



CODE OF CONDUCT – BUSINESS PARTNERS

INTRODUCTION

GDEX Berhad and all companies included in the Group (henceforth referred to as GDEX or the Company) value the fact that all the operations of the Company are characterized by honesty, integrity and fair play. Thus, it is vital to ensure that dishonesty, disloyalty or corruption do not harm GDEX good reputation.

GDEX has a zero-tolerance policy on bribery and corruption. This applies to all the Company's business dealings and transactions in all the countries in which the Company or its subsidiaries and business partners operate.

What is considered as a bribe or corrupt act is regulated in each country's legislation.

GDEX particularly wishes to point out, that the Company does not take any commission from our suppliers. Should any of our Company employees, openly or implied, ask for a commission of any kind, the supplier is requested to immediately inform GDEX via the official website as governed by GDEX's Whistleblowing Policy and Procedures. Anyone who fails to report corrupt act will be fined up to RM100,000 or be imprisoned for a term not exceeding 10 years or both pursuant to Section 25 of the Malaysian Anti- Corruption Commission Act 2009.

As a business partner/supplier to GDEX, you should read and comprehend with the content in GDEX Code of Conduct and comply with its policy in all your business dealings with the Company's employees. All businesses carried out with or on behalf of GDEX should always be conducted in accordance with the Company Code of Conduct, ISO 37001:2025 Anti-Bribery Management System (ABMS) that are applicable to the organization and follow related laws and regulation in the Country of business.

GDEX is committed to continuously reviewing and updating its policies and procedures, therefore this Code of Conduct can be subject to modification.

Please sign the compliance commitment on the last page of this Code of Conduct and return it to the Company, indicating that you have received, read, understood and agreed to comply with the GDEX Code of Conduct.

GRATIFICATION

In the conduct of Company business, it is a violation of GDEX Code of Conduct if a business partner/ supplier offers any kind of advantage to a Company employee.

It is a GDEX policy to prevent its employees from requesting, accepting, arranging, offering or giving any kind of gratification.

The term "gratification" could include, but is not limited to; gift, loan, money (regardless currency), fee, reward, journeys, service, bonus, vouchers of any kind, order samples for personal use, employment contract, discount on private purchases and other favours such as sponsoring and event tickets.



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GDEX does not allow the offer or receipt of hospitality provided directly or indirectly by employees, and/or business partners of GDEX and/or third parties for or on behalf of GDEX whenever arrangements could affect the outcome of business transaction, i.e. the purpose is to obtaining or retaining business with GDEX.

Whether the bribe was accepted or not, merely by offering the bribe would be sufficient for an offence to be committed.

CONFIDENTIAL INFORMATION

Employees and/or business partners of GDEX must never disclose any confidential company information to any person outside or within the Company, except with a prior permission from the Company.

Confidential information includes but is not limited to: GDEX's financial and commercial relationship, buying, offers, strategies, supplier's information, information on suppliers' capacity, IT solutions, campaigns, new sales markets, analyses, sensitive personnel data, information concerning GDEX and/or the business carried on within GDEX and which is not generally known outside the Company; in other words, has not been published or otherwise communicated by or through GDEX.

COMPLIANCE

All GDEX business/supplier should read and comprehend with the content of GDEX's Code of Conduct and comply with all applicable policies and procedures specifically mentioned in this Code of Conduct.

All GDEX business partners/suppliers have the responsibility to inform their employees and subcontractors about the content of GDEX's Code of Conduct which is made available on the [official website](#) and to secure their compliance.

The Company will fully investigate any instances of alleged or suspected bribery. A deliberate violation of GDEX's Code of Conduct will lead to termination of all business connections with the Company.

Since most sections of GDEX's Code of Conduct follow the law in each country where the Company operates, any deliberate violation of these guidelines may be a criminal act. A criminal act under the law as stated in the Code of Conduct may result in prosecution.



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GD EXPRESS GROUP OF COMPANIES (GDEX)

CODE OF CONDUCT COMPLIANCE COMMITMENT

We hereby confirm that we have received and taken notice of GDEX's Code of Conduct, i.e. read and comprehend with the contents in page 1-2.

We commit to comply with GDEX's Code of Conduct, to take the responsibility to inform all our concerned employees and subcontractors about the content in GDEX's Code of Conduct which is made available on the [official website](#) and to make sure they comply with the Code accordingly.

If I, or any other representative of my company or subcontractors, have questions concerning the meaning or application of GDEX's Code of Conduct, or any other GDEX policies, we know that we should contact the Company, knowing that our questions or report to these sources will be maintained in confidence.

Place and date

Business Partners Company name

Position in the Company, title

Signature

Name in printed letters

Business Partner Company Stamp

Please sign and submit only page 3 to the Company. Thank you.