

MALAKOFF CORPORATION BERHAD

CODE OF CONDUCT

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1.0 NOTE

This document has been published for the internal use of Malakoff Corporation Berhad and its subsidiaries and shall not be reproduced in any form, or be transmitted electronically or through other means or quoted or referred to in any public document or media without its prior written consent.

Under this Code of Conduct, reference to “Malakoff Group” means Malakoff Corporation Berhad or its subsidiaries or both and reference to “Company” means Malakoff Corporation Berhad or the relevant subsidiary, depending on the context of the provision.

Malakoff Group reserves the right to review, amend or update this Code of Conduct from time to time. For any enquiries and clarifications, please do not hesitate to contact the Human Resources Department (“HRD”) of Malakoff Group.

2.0 INTRODUCTION

As we pave our way forward to success through the implementation of sound business principles and financial investments, Malakoff Group is committed to maintaining the highest standards of integrity and professionalism in its business dealings including conducting its business fairly and impartially and in full compliance with all applicable laws and regulations. The introduction and implementation of this Code of Conduct ("the Code") is as a catalyst to achieve such goal where the Code will function as a guide for our Employees (“Employees” or ‘We’) to understand and adopt the basic standards of conduct that is expected of them.

Generally, there are eight (8) underlying principles that the Employees must observe. These principles form the basis of the Employees' conduct towards their own Company, customers, vendors, suppliers, contractors and other external parties. The basic principles are:-

- (a) Honesty; avoiding hiding the truth;
- (b) Integrity; avoiding situations where the personal interest of the Employees appears to be in conflict with the interest of Malakoff Group;
- (c) Leadership; avoiding abuse or misuse of the Employees' position in the Company;
- (d) Professionalism; maintaining secrecy at all times of confidential information obtained in the course of the Employees' employment in Malakoff Group and not disclosing or using such confidential information for personal advantage;
- (e) Loyalty; avoiding placing the reputation of the Company in jeopardy;
- (f) Responsible; disclosing and seeking clarification from relevant persons in the Company whenever in doubt or whenever ethical concerns arise;
- (g) Trustworthy; avoiding misuse of the Company’s resources or assets for personal gain; and
- (h) Personal Conduct; conducting or behaving in any manner at any place and time that does not bring disrepute to the good name of Malakoff Group.

3.0 OBJECTIVES

The Code of Conduct shall serve as the Company's formal commitment to conduct ourselves professionally at all time and do business in a transparent, appropriate and fair manner. This document is meant as a reference for all levels of employees as well as all parties that do business with us.

The objectives of the Code are:

- (a) To define acceptable behaviors;
- (b) To assist the Employees in living up to high ethical business standards;
- (c) To convey to both the Employees and external parties that Malakoff Group shall under no circumstances allow the ethical principles to be compromised; and
- (d) To promote awareness and understanding among the Employees and external parties that failing to comply with the Code and its applicable laws and regulations as well as Malakoff Group's policies and procedures may result in appropriate disciplinary action.

The Code is not a comprehensive manual that covers every ethical situation that Employees would encounter during their course of work but rather a guide that highlights key issues and identifies the relevant policies and procedures and resources to help Employees conduct business in line with the Company's standards.

4.0 RESPONSIBILITY AND ACCOUNTABILITY

4.1 Employees

It is compulsory for Employees to comply with the Code whereby ignorance of the existence of the Code including its amendments or updates will not be accepted as an excuse for its breach. To ensure the implementation of the Code is carried out effectively, upon joining the Company, Employees are required to accept the Code as a pre-requisite of their employment by signing the declaration provided under the Code. As the Code will be continuously updated from time to time to align with business requirements, the latest version of the Code can be found online at Malakoff internal portal (MacNet).

4.2 Managers and Supervisors

Being assigned with greater responsibility in guiding their subordinates, managers and supervisors must lead by example in understanding and practising the Code in their daily routine of works with the Company. They assume the role and responsibility as the first point of contact for their subordinates to obtain necessary clarifications if there is any ambiguity with regards to the Code and its implementation. They should diligently be on the lookout for indications that unethical or even illegal business conduct has occurred.

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4.3 Customers, Vendors and Suppliers/Contractors

It is the duty of Employees to ensure that all customers, suppliers, vendors, contractors and their respective subcontractors of the Company to conform to the principles outlined in the Code in their business relationships and dealings with the Company. In the event where they face difficulties or issues on observing such principles, Employees must first work with them to resolve such difficulties or issues, and if they fail, the Company will engage other parties who can observe such principles diligently and meet the standards as outlined in the Code.

If Employees have any concern about unethical conduct or business practices taking place in the Company, Employees are expected to take appropriate and consistent action by informing their manager/supervisor. If the manager/supervisor fails to provide a solution or advice, the matter should be referred to HRD. Please take note, though, that HRD will not entertain any anonymous letters. All correspondences with HRD would be treated in the strictest confidence.

HRD can be contacted via:

Telephone: 03-22633261

Email: hrd.coc@malakoff.com.my

Office address: Level 10, Block 4, Plaza Sentral, Jalan Stesen Sentral 5, 50470, Kuala Lumpur.

5.0 PART I – OUR RESPONSIBILITIES TO THE COMPANY

5.1 Personal Appearance

Personal appearance is a reflection of Malakoff Group's image. Therefore, Employees must be well groomed and in proper working attire in accordance with the Company's requirements at all times.

5.2 Respect for Another

The Company believe that their internal customers are equally important as compared to the external parties. As such, Employees shall conduct themselves in a professional manner and in the best interest of the Company and demonstrate the highest regard for one another and shall treat each other with respect and dignity, avoiding any language or behaviour that intimidates or offends others in any dealings, listening to other individual's ideas and opinions and also recognizing each individual's contribution to the Company.

Abusive, harassing or offensive conduct is unacceptable, whether verbal, physical or visual. Examples include derogatory comments based on racial or ethnic characteristics and unwelcome sexual advances. We are encouraged to speak out

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when a co-worker's conduct makes us uncomfortable, and to report harassment when it occurs.

As part of respect for others, we shall conduct ourselves in a professional manner at meetings and will not engage in personal telephone conversations during meetings or allow the meeting to be distracted or interrupted by the ringing of our mobile phones.

5.2.1 Each and everyone's responsibility

- i) Employees shall each be responsible for fostering an atmosphere that promotes good relations between one another.
- ii) Managers and supervisors have the added responsibility of managing their direct subordinates in the most effective and efficient manner and with respect for the individual. Make your decisions fairly and without discrimination, based on objective criteria and results and Company-provided guidelines and policies. Do not discriminate against any individual or group because of race, religion, gender or disability. Do not use your position or other disadvantages you may have, such as seniority or physical size, to harass or intimidate others. Such harassment can appear in the form of withholding or keeping deserved rewards unfairly or demanding unfair or illegal favors in return for doing your proper duties.
- iii) Employees, on the other hand, must not behave towards one's supervisor or another supervisor in an insulting or impertinent manner, or to wilfully defy reasonable, lawful authority as this constitutes insubordination which is detrimental to the organizational well-being.

5.3 Safe Work Environment

5.3.1 Safe and Conducive Work Environment

- i) In line with the Health, Safety and Environmental Policy (HSE), Malakoff Group is committed to providing a safe and conducive work environment.
- ii) It is everyone's responsibility to ensure the HSE Policy is implemented efficiently by promoting safe behaviour, and checking unsafe conditions in the workplace. We are responsible for immediately reporting accidents, injuries and unsafe equipment practices or conditions to a supervisor or other designated person.

5.3.2 Employees' Obligations

- i) In order to protect the safety of all employees, each of us must report to work in the healthy condition that fit for us to carry out our duties without the influence of any substance or external factors that could prevent us from conducting work activities safely and effectively.

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Threats or acts of violence or physical intimidation on fellow employees are prohibited.

- ii) We must take all possible care to ensure our safety, as well as the safety of our co-workers and others around us, at all times. We must follow all rules and regulations laid down on safety matters; influence and persuade others to do the same (as their non-compliance may harm us, the Company and others too), and report cases of non-compliance.
- iii) In cases where there are no formal rules and regulations or guidelines, use common sense and your best judgement to ensure safety.

5.3.3 Breach of safety rules and procedures

- i) Employees are required to follow all established safety rules and practices. This is to ensure that we, including our families that depends on us, benefit from a safe work environment.
- ii) As one's unsafe act or unsafe behaviour can endanger others, all breaches of safety practices may be subjected to disciplinary action.

5.4 Assets and Properties

5.4.1 Employees' Responsibilities

- i) We shall use the Company's assets, resources and property individually and publicly entrusted and provided to us with care from loss, damage, misuse, illegal use or theft.
- ii) Malakoff Group's assets, resources and property, such as funds, installations, materials, office equipment or facilities, Company vehicles, access and security cards should only be used for business and official purposes or other purposes as approved by the Company. Personal usage of those assets, resources and property is prohibited unless with prior approval or consent from the Company.
- iii) We must also be responsible to maintain, regularly update, keep and secure any inventory of the assets established by the Company. If removed from Company facilities, we must return the assets and property to the facility when it is no longer needed for business purposes. Similarly, use the Company's facilities provided to you, such as telecommunication services, for the direct benefit of the Company.

5.4.2 Company vehicles and petrol cards

- i) The usage of the Company vehicles are only for business or official purposes only and handled in accordance with procedures or rules as imposed by the Company.
- ii) All Company vehicles are assigned with petrol cards. Petrol cards are not to be shared with other vehicles and are meant for purchasing fuel only. Any matters related to the usage of the Company vehicles including emergency cases must be liaised with the Administration Department as soon as practicable.

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5.4.3 Access to the internet and its materials

Access to the Internet is provided to all employees at the work place. However, Internet usage should be strictly for business purposes which include any research work related to the user's field of work. The Company reserves the right to revoke the user's Internet access if he/she is found to abuse the computing facilities outside the scope of the work.

5.4.4 Abuse of Computer / Information and Communication Technology (ICT)

Employees are bound by the Information Security Management System (ISMS) Policy and must avoid the following acts in using Malakoff Group's computers and/or any other ICT devices:

- a) Installing, connecting and/or using software and hardware without proper license and authorization.
- b) Downloading large files or accessing streaming audio or video for own personal usage.
- c) Usage of unauthorized computer access (password) and disclosing and/or divulging passwords to unauthorized parties.
- d) Unauthorized access to data or programme, unauthorized modification of the contents of any data or programme and disclosing and/or divulging such data or programme to unauthorized parties.
- e) Fraudulent use of network and network facilities.
- f) Sending obscene materials via any electronic media.

5.5 Information

5.5.1 Confidential and proprietary information

The Employees, in full compliance with relevant applicable privacy laws as well as Personal Data Protection Act 2010, are obliged to protect Malakoff Group's and third-party confidential and privileged information from unlawful disclosure, and to ensure that such information is handled properly throughout the organization.

Confidential and privileged information can only be used by the relevant parties for business purposes only and must be handled discreetly. Assisting third parties to gain access to such information is prohibited. Should any release of such information become necessary, the relevant authorized personnel / department shall be consulted and their approval must be obtained.

The Employees are bound by the Malakoff Corporate Disclosure Policy and Guidelines. The employees shall not misuse privileged company information or any form of information based on their knowledge from the job, for personal and third party gain.

i) Disclosure

The Employees shall not disclosed any information to external parties unless it is deemed to be within the public domain and prior written approval is not required by the Disclosure Committee of the Company.

ii) Price-sensitive Information

- a) It is imperative for the Employees to be aware of the Company's policy on confidentiality.
- b) Confidential information does not only relate to information regarding Malakoff Group but also information relating to Malakoff Group's customers/partners, which Employees has obtained during the course of his employment.
- c) The Employees should always secure all records of his dealings/ transactions.

5.5.2 Recording and Storing of Information

- i) Employees shall not misrepresent or falsify any information in Company records, including personal information.
- ii) Employees shall ensure that honest and accurate information are provided in order to make responsible business decisions. This includes such as quality, safety and personnel records, as well as all financial records.
- iii) All financial books, records and accounts must accurately reflect transactions and events, and conform both to required accounting principles and to Malakoff Group's system of internal controls. No false or artificial entries may be made. When a payment is made, it can only be used for the purpose spelled out in supporting document.
- iv) All business records and communications should be clear, truthful and accurate. We will avoid exaggeration, guesswork, legal conclusions, and derogatory remarks or characterizations of people and companies. This applies to communications of all kinds, including email and "informal" notes or memos. Records should always be retained and destroyed according to and in compliance with Malakoff Group's record retention policies and all legal requirements.
- v) Storage media containing confidential data or licensed or copyrights software, must not be taken off-site by employees and contractors without consent and authorization from the owner or your manager and supervisor.

5.5.3 Insider Trading

The Employees are not allowed to indulge in the practice of Insider Trading in the manner prohibited under the Capital Market and Services Act 2007, Companies Act 1965, the Bursa Malaysia Securities Berhad Main Market Listing Requirements, Bursa Malaysia Securities Berhad Ace Market Listing

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Requirements and other relevant laws and guidelines as may be imposed by the relevant authorities from time to time.

i) Insider

For the purpose of this section, an insider shall include but not limited to a person who/s:

- a) Directors and officers of the Company and subsidiaries;
- b) Employees;
- c) Persons who provide business or professional services to Malakoff Group; and
- d) Any other person or company informed about undisclosed material information about Malakoff Group by any of the above

ii) Dealing in Securities of the Company

No insider shall deal in the securities of the Company:

- a) During the period commencing from 30 calendar days before the targeted date of announcement to the relevant stock exchange of the quarterly results up to one full market day after the announcement of the Company's results for the financial quarter; or
- b) Where the Employees has knowledge of price-sensitive information not generally available to the public, during the period commencing from the time information is obtained, up to one full market day after the announcement to the relevant stock exchange of a matter that involves price-sensitive information in relation to the securities concerned has been made.

iii) Dealing in Customer or Suppliers' Securities

At any time when the Employees has knowledge of price-sensitive information is not generally available to the public, no dealings in the securities of customers or suppliers, on the basis of information gained as an Employees should take place.

iv) Dealing in Merger / Acquisition Situations

The Employees or their immediate family member shall not in any way whatsoever deal in the securities of any target company from the time when there is reason to suppose that an approach or offer is contemplated unless an announcement of completion or termination has been made to the public.

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For the avoidance of doubt, “dealings” shall mean any transaction relating to;

- shares in or debentures of the Company or any interests other than shares or debentures within the meaning of Section 84 of the Companies Act 1965; or
- rights or options in respect of the acquisition or disposal of such shares, debentures or interests.

5.6 Time

5.6.1 Punctuality

- i) Punctuality promotes goodwill and respect. Therefore, employees must be punctual in regards to working hours, attending meetings, conferences, training and appointments; both in-house as well as with external customers.
- ii) Employees must be at their assigned workstation, ready to work at the beginning of their daily working hours. They are also expected to remain at work until the end of their assigned work hours, except for approved breaks and outside appointments.

5.6.2 Absence with Permission

An employee needs to obtain prior approval from his manager/supervisor if he/she has to leave the workplace to attend to urgent personal matters outside the Company during working hours.

5.7 Other Employment/Disclosure of Other Business Interest

- 5.7.1 An employee is not allowed to conduct his own private business or other positions of another company during his/her employment with the company.
- 5.7.2 An employee is not allowed to hold directorship outside of Malakoff Group and prohibit the acceptance of such position if it would involve, inter alia, a conflict of interest situation or interfere with the complete and proper discharge of the Employees’ duties to Malakoff Group.
- 5.7.3 All private business activities/external directorship must be disclosed to the HRD and must seek the approval of the HRD.
- 5.7.4 An employee may only participate or be engaged in other employment with prior written approval HRD, subject to future review from time to time.

6.0 PART II – OUR RESPONSIBILITIES TO OUR CUSTOMERS, VENDORS, SUPPLIERS AND CONTRACTORS

6.1 Customers

6.1.1 Integrity and professionalism

- i) We will build long-term relationships with our customers by demonstrating honesty and integrity.
- ii) All of our marketing and advertising will be accurate and truthful.
- iii) To maintain Malakoff Group’s valuable reputation, compliance with our quality processes and safety requirements is essential.

6.1.2 Relationship with customers

- i) We will ensure that all our dealings with customers are conducted using the highest ethical standards in order to successfully meet the customer’s business needs, and to further enhance Malakoff Group’s reputation.
- ii) We will maintain our customers’ self-esteem by employing the highest business standards when we interact with them face-to-face, through our correspondences, and over the telephone.

6.2 Doing Business with Others

6.1.1 We will only obtain business legally and ethically

- i) Business decisions and actions must be based on the best interests of Malakoff Group, and must not be motivated by personal considerations or relationships. Relationships with prospective or existing suppliers, contractors, customers, competitors or regulators must not affect our independent and sound judgment on behalf of Malakoff Group. Malakoff Group employees are required to disclose to Management any situation that may be, or appear to be, a conflict of interest. Remember, when in doubt, it is best to disclose.
- ii) Employees may not work for, or receive payments for services from any competitor, customer, distributor or supplier of Malakoff Group without the prior written approval of Management.
- iii) Any outside activity must be strictly separated from Malakoff Group employment and should not affect job performance within the Company. We must make sure that the skills we learn and use in the Company are not used in such a way that could harm the business of Malakoff Group.

6.1.2 Conflicts of interest

- i) We must not use personal influence to get Malakoff Group to do business with a Company in which our family members or friends have an interest.

- ii) As such, shall declare to the Management and thereafter abstain from any involvement in the any activity that may conflict with our responsibilities to Malakoff Group. A conflict of interest occurs if our activities or personal interests appear to or may influence the objective decisions required in the performance of our responsibilities for Malakoff Group.
- iii) This means that we, or any of our family members cannot receive gifts, loans or other special preferences beyond what are otherwise ordinarily available from a person or organization that does, has done, or wants to do business with the Company or is a competitor of the Company.
- iv) In our dealings for Malakoff Group, we must not realize any profits apart from our regular compensation. The only exceptions are gifts of small value extended as a business courtesy. This includes sales promotion items or the occasional business meal.

6.3 Giving and Receiving Business Courtesies

The acceptance of a gift by the Employees must always be subject to the provisions allowable under the relevant anti-bribery legislations currently in force or any integrity obligations taken up by the Company. The following provision only serves as a guideline on what constitute appropriate gifts or token that can be received by the Employees:

- (a) The Employees shall not solicit or accept any benefit, reward or gift of any kind, intended to create an improper advantage or that which may create the appearance of impropriety, or perceived to be able to influence decision making either directly or indirectly from third parties or from any other Employees of Malakoff Group. Decision making should be objective, based purely on merits and should benefit the company.
- (b) It is the Company's requirement that all gifts must be managed to avoid abuse and not for the personal benefit or interest of the Employees.
- (c) The above provisions shall extend to inter-Malakoff Group business transactions and to any governmental body/officials.
- (d) The above provisions do not prohibit lawful reimbursement for reasonable and bona fide expenditures incurred by an Employees which is directly related to the promotion of Malakoff Group's products and/or services.
- (e) Employees may consult HRD when in doubt or when uncertainty arises.

6.4 Purchasing and Procurement Practices

6.4.1 Acting in Malakoff Group's best interest

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- i) Purchasing decisions must be made based solely on Malakoff Group's best interests. The selection of Suppliers shall be based on product or service suitability, price, delivery and quality and shall fit the purpose of the business with Malakoff Group.
- ii) Purchasing agreements should be documented and clearly identify the services or products to be provided, the basis for earning payment, and the applicable rate or fee. The amount of payment must commensurate with the services or products provided.
- iii) All tender evaluators will be required to sign a separate declaration absolve from any conflicts of interest, will keep all information confidential and will not copy any documents, etc. as governed under Group Procurement Policy.
- iv) Notwithstanding, all staff involved in procurement of one form or another must comply with the features of sound procurement practices as follows:
 - a) A level playing field (i.e. all vendors are treated equally and all are afforded the same information at the same time).
 - b) Confidentiality (i.e. ensuring that no information leaks during the procurement process).
 - c) No conflict of interest through relationships, receipt of gifts etc. to ensure no favouritism amongst vendors.
 - d) More than one bidder, as competition between two or more suppliers results in lower prices for the Company.
 - e) Transparency, which ensures that the procurement process is auditable and justifiable, and can stand up to scrutiny.
 - f) More than one Malakoff Group staff and function is involved, which ensures counter check on the staff and visibility that not one person make the decision.
 - g) Getting the best deal for the Company and that the process can stand up to scrutiny by any party.
 - h) The Procurement Department and the end user must carry out any negotiation with vendor. The end user is not allowed to negotiate prices with the vendor on his/her own.

6.4.2 Improprieties or potential thereof

- i) Any conflicts of interest (or potential thereof) through relationships or friendships with people in other companies invited by us to tender for any project must be declared to HRD. This covers staff that has relatives or friends working for the vendors/suppliers.
- ii) Where there is evidence or suspicion of improper behaviour during the tender process or after its award, this must be reported to HRD.

6.4.3 Business courtesies by vendors or suppliers

- i) It is at times, difficult to refuse a vendor or supplier's insistence in paying for a meal or a drink especially in instances where after meetings or discussions, a quick trip to the stall or restaurant is common.

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- ii) The key question is whether the staff feels "obligated" by the "hospitality". As soon as the "hospitality" moves from that of a common courtesy to something that could influence the staff in favour of the vendor in the decision making process, the line must be drawn.
- iii) Any approaches by a vendor, which go beyond the normal bounds of courtesy or offer or receipt of gifts, and any potential conflict of interest, must be reported to HRD.

6.4.4 Commitment on behalf of the Company

- i) Any monetary commitment done on behalf of the Company must be in accordance with the limits of authority spelled out in the manual. All employees must comply with these limits of authority and be aware that management will view violation of his/her authority seriously and any non-compliance will result in severe disciplinary action.
- ii) All staff must know that the authorization and approval of the budget/operating plan is not, per se, the authorization to spend the amounts. Approval to incur the expenditure is still required even though it is budgeted for.
- iii) No single employee can approve a requisition, place an order, receive goods or approve an invoice for payment all by him or herself. Likewise, no individual is allowed to approve his/her own claims or expenses for payment.
- iv) No employees is permitted to break down the total value of a commitment i.e. purchase or contract, into smaller orders to avoid approval by a higher approving authority.
- v) An employee can only delegate his or her limits of authority to line subordinates in the functional area that he/she is responsible for, and the delegation must be time or task specific. A line subordinate who has been delegated authority is not allowed to further delegate the authority given to him/her.

6.4.5 Commitments by resignees and consultants disallowed

- i) An employee who has given notice to resign and is serving the notice period, or an expatriate staff who is within three months of the end of his/her assignment/contract, are not allowed to make any commitments on behalf of the Company.
- ii) No consultants (i.e. a person who is not a full-time MALAKOFF GROUP employee or a full-time secondee from an investor's Company) are allowed to make or approve any commitment on behalf of the Company.

6.4.6 Handling cash and company monies

- i) We will follow all instructions on how to handle cash and other Company funds that we are responsible for. We will not use, divert or

conduct any other transactions with those funds except strictly for authorized purposes. We will maintain tight control over the funds we are responsible for, and report any non-compliance immediately to the appropriate channel.

- ii) We will ensure any financial records accurately reflect all transactions. MALAKOFF GROUP's books and records shall not contain any false or misleading information. All payments must be made for the purpose stated. The Company's financial records will conform to generally accepted accounting principles. There must be no undisclosed or unrecorded funds or assets.

7.0 PART III – OUR RESPONSIBILITIES TO OTHER EXTERNAL PARTIES

7.1 Safeguarding Our Reputation

7.1.1 Establishing business relationships

We will not do business with parties who are likely to harm Malakoff Group's reputation, intentionally and continually violate the law. Prior to any arrangements and engagement with third parties, we must ensure that the process of such arrangements and engagements confirm and comply with Malakoff Group's policy and the applicable law.

7.1.2 Avoiding any attempts to obtain favourable treatments/terms

- i) Malakoff Group will not condone any acts committed by its Employees who attempt or commit to make payments to third parties to secure sales or obtain favourable terms or treatment.
- ii) Gifts of substantial value or extravagant entertainment that may be construed as attempts to influence decisions are prohibited.
- iii) Assistance or entertainment given to third parties should not compromise or even appear to compromise their integrity in conducting transparent and fair business dealings.

7.2 Government Agencies

7.2.1 Employees who deal with government officials and contracts must always adopt a strict observance to the Code and full compliance with the applicable laws and regulations.

- i) Employees who deal with government officials and contracts are responsible for knowing and complying with applicable laws and regulations.

7.2.2 Offers and unlawful payments are disallowed

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- i) Employees are strictly not allowed to directly or indirectly offer or make any unlawful payments to government officials, including employees of statutory bodies and state-owned enterprises.
- ii) This requirement applies both to employees and agents, such as service agents and dealers, irrespective of geographical location.
- iii) If you are authorized to engage agents, make sure that they are reputable and you require them to agree in writing to Malakoff Group's standards in this aspect.

7.3 Requests or Queries from the Third Parties and the Media

Requests or queries from the third parties such as government agencies, financial analysts and shareholders or the media ("Requestors"), should be managed and handled properly by forwarding such requests or queries to the Authorized Person been assigned by the Company. It is to ensure that Requestors will receive professional, accurate and credible feedbacks. Any responses by unauthorised parties such as irresponsible Employees or even those who are acting in good faith and with sincere intention, might possibly cause their version of stories misinterpreted by the Requestors.

7.4 Political Parties, Non-Governmental Organizations (NGOs) and Non-Profit Organizations (NPOs)

- (a) Contributions to political or social parties or movements or professional bodies where permitted by local law and practice must be authorized by Malakoff Group in writing.
- (b) The Employees engaging in politically, socially or professional body-related activities will do so in their personal capacity as a private citizen and not as a representative of Malakoff Group, and this should be made as a matter of public record. They shall ensure that their activities do not interfere with the efficient and due discharge of their duties to Malakoff Group. The Employees shall also ensure that Malakoff Group is not perceived as supporting the Employees' activities. If such activities encroach into the actual work and working hours that should be devoted to Malakoff Group, prior written approval from Malakoff Group must be obtained. The Employees who wish to stand for State and/or Federal election are required to resign from the Company.

8.0 SUMMARY

8.1 The Role of Employee

It is the responsibility of the Employees to understand and comply with the Code and to adhere to the general applicable laws and regulations. Self-presumptions or ignorance of the law is not an excuse for non-compliance with the Code and breaching the law. If the Code does not address specifically any possible related

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concerns and circumstances, common sense and attention to the Company's core values and its commitments to legal and ethical behaviour should be a guideline.

The Employees who contravene the Code may be liable to disciplinary proceedings and the Company reserves the right to initiate legal action against such Employees.

8.2 The Role of Immediate Manager and Supervisor

If there is any ambiguity with regards to the Code and its implementation, the Employees' first point of contact is their immediate manager and supervisor. They will be able to engage in discussions with you about the Code and advise you accordingly.

8.3 The Role of the Human Resources Department

In the event the Employees' immediate manager or supervisor is not able to provide any proper advice or constructive instruction following the queries by the Employees on the Code, such queries should be channeled to the Human Resources Department.

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9.0 DECLARATION

I hereby declare that I have received Malakoff Corporation Berhad’s Code of Conduct. It is my sole duty and responsibility to read and understand the provisions of the Code.

I shall conduct myself with complete integrity in the daily execution of my daily duties and assignments. I undertake that I will abide by the existing provisions of the Code and its future revisions (if any) as per the current uploaded version of the Code which can be found online at Malakoff internal portal (MacNet). If for any reason(s) I do not comply with any of the provisions in the Code, I shall not cite ignorance or lack of understanding as my self-defence and agree that the Company has the absolute right to take action due to any violations of the Code.

I fully understand that the Company has the absolute discretion to add, amend or delete existing Code as and when necessary.

Signature

Full Name (please print in capital letters)

Identity Card / Passport No.

Designation

Department /Division & Company

Date