

**POLICY**

**ASSOCIATES CODE OF  
CONDUCT**

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## 0.0 OBJECTIVE

Sunway Construction Group (“SCG” or the “Company”) has implemented the Code of Conduct and Business Ethics (“CCBE”) to guide behaviours expected of each and every employee, including directors of SCG (“Employees”) to align with Sunway Group’s core values.

In line with the CCBE, SCG has developed this Associates Code of Conduct (“Code”) to outline its commitment to integrity, ethical practices across its supply chain, respect for human rights, and adherence to environmental, health, and safety standards. The Code also sets forth SCG’s expectations of Associates (as defined in SCG’s Anti-Bribery and Anti-Corruption (“ABAC”) Policy) when conducting business with or on behalf of SCG.

## 1.0 SCOPE

This Code is applicable to all Associates of SCG and applies to all business and countries in which SCG operates. Associates shall also require their subcontractors, sub-tier suppliers and any other sub-tier third parties to comply with this Code in their operations and across their supply chain for work that is directly related to SCG and/or any of its subsidiaries.

## 2.0 CORE VALUES OF SCG

2.1 To ensure greater focus on win-win relationships with SCG’s customers and stakeholders, SCG have built a foundation based on three core values: **Integrity, Humility and Excellence.**

Integrity (We believe in doing the right thing at all times)

- We conduct ourselves in an honest and trustworthy manner.
- We act professionally, ethically and honourably.
- We ensure our actions are consistent with our words.

Humility (We believe in being humble, polite and respectful)

- We never stop learning.
- We care for and respect people and the environment.
- We seek first to understand, then to be understood.

Excellence (We take pride in all that we do)

- We strive to deliver high quality products and services.
- We continuously innovate and improve for greater progress.
- We seek to inspire others to excel.

## 3.0 SUSTAINABLE DEVELOPMENT

SCG is doing its part towards building a sustainable future for all in this world that we call home. Our stakeholders – including customers, Employees (as defined in SCG’s ABAC Policy), shareholders and Associates – are all deeply involved and committed towards this agenda. We constantly strive to incorporate sustainability into our business practices, processes and operations.

## 4.0 ACT WITH INTEGRITY & ETHICS

### 4.1 Anti-Bribery and Anti-Corruption:

SCG adopts a ZERO TOLERANCE policy against all forms of bribery and corruption and is committed to conduct its business in accordance with the MACC Act 2009 and the MACC (Amendment) Act 2018 (the “Act”) and any other applicable laws.

SCG strictly prohibits all forms of corrupt payments, including facilitation payments. SCG expects all Associates to uphold high ethical standards, adhere to SCG’s ABAC Policy, and comply with the Act as well as all applicable anti-bribery and anti-corruption laws.

*[Reference: ABAC Policy (Ref. No. SCG/Policy/01)]*

### 4.2 Giving & Accepting of Gifts, Entertainment and Hospitality:

SCG observes a strict “No Gift” policy, under which employees are not allowed—either directly or indirectly—to give or receive gifts, entertainment, or hospitality, unless otherwise allowed in accordance with SCG’s Gift, Entertainment and Hospitality Policy (“GEH Policy”). Accordingly, Associates are expected to be familiar with, respect, and comply with the requirements set out in the GEH Policy.

Associates are expected to exercise sound judgment when offering business courtesies. Any courtesies extended to SCG employees—if allowed—must be modest in value, infrequent, and consistent with standard business practices. Associates must not offer anything of value with the intent to secure or retain a benefit, nor provide anything that could be perceived as influencing decisions, compromising integrity, or creating a sense of obligation on the part of SCG employees.

*[Reference: GEH Policy (Ref. No. SCG/Policy/03)]*

## 4.3 Sponsorship:

SCG always seeks avenues in which SCG can contribute to the community through sponsorship and corporate responsibility programmes.

Associates must not, directly or indirectly, offer or provide anything of value to any government official or other party with the intent to improperly influence their actions or decisions in order to advance SCG's business interests in any way.

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Associates are expected to understand that payments for sponsorship and corporate responsibility programmes by SCG or any of its Employees are made in full compliance with SCG's policies including but not limited to the ABAC Policy, the Anti-Money Laundering, Countering Financing of Terrorism and Countering Proliferation Financing Policy ("AML/CFT/CPF Policy") and all applicable laws and regulations.

For clarity, sponsorship includes donations of cash and in kind, contributions and sponsorships to individuals (public officials included), organisation, statutory authority, local authority, public body or other bodies.

## 4.4 Anti-Money Laundering, Countering Financing of Terrorism and Countering Proliferation Financing:

SCG prohibits all practices related to money laundering, including dealing in the proceeds of criminal activities, terrorism and proliferation financing.

As a rule, Associates must carry out reasonable degree of due diligence to understand the business and background of prospective customer, vendor, third party or business partner that intends to do business with them to determine the origin and destination of money or assets involved. Any suspected activities relating to money laundering, terrorism financing and proliferation financing should be reported immediately to Bank Negara Malaysia and relevant authorities in accordance with SCG's AML/CFT/CPF Policy.

*[Reference: AML/CFT/CPF Policy (Ref. No. SCG/Policy/02)]*

## 4.5 Insider Trading:

As a public listed company, SCG is required to comply with various laws and regulations to make timely, full and fair public disclosure of information that may materially affect the market for its stock.

Associates are prohibited from buying or selling SCG's or any other company's shares while in possession of material non-public information—information that is not publicly available and could impact an investor's decision to trade the stock.

## 4.6 Fraud

Associates must not engage in any form of fraudulent act or dishonest conducts involving property or assets, or on the financial reporting and accounting of SCG or third party.

## 4.7 Dealing with Competitors:

SCG is committed to compete ethically in the marketplace. You are required to comply with anti-competition laws in the countries in which SCG operates. Wherever there is a need to collect, share and use information about competitors, it must be done in a legal and ethical manner.

## 4.8 Avoid Conflict of Interest(s):

Conflict of interest is a situation where you have a private or personal interest sufficient to influence or appear to influence the objective exercise of your official duties as an Associate.

Associates must avoid such conflicts and situations that may be perceived as creating a conflict of interest that may influence your judgement in the discharge of your obligations.

Associates are required to declare any situation of conflict in such areas such as financial benefit, personal relationship and personal benefit / involvement, through e-Subcontractor Registration Evaluation (“e-SRE”) form and/or during onboarding and to report any changes within two weeks of any change in the status. Failure to disclose any conflicts of interest may result in disqualification, blacklist, rejection, de-registration, termination, forfeiture of monies including retention sums and forfeiture of bonds or deposits, and/or withholding any payments due or to be due to an Associate, as may be applicable.

## 5.0 HUMAN RIGHTS AND FAIR LABOUR PRACTICES

SCG is committed to ensuring that all individuals involved in the delivery of its products and services are treated with dignity and respect. Associates are expected to fully comply with all applicable employment laws and policies including without limitation to SCG’s Human Rights Policy and any other employment requirements imposed by the project employer or owner, uphold SCG’s commitment to human rights, promote equal opportunity in the workplace, and take effective action to address any negative human rights impacts. Without limitation, Associates must adhere to the following requirements:

## 5.1 Human Rights

At SCG, we respect and support the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights and the rights of all Employees and Associates.

As a responsible global corporate citizen, SCG endeavours to meet standards and practices that are consistent with internationally recognized principles, subject to the laws and regulations of the countries and territories in which SCG operates and expects the same standards and practices to be adhered to by its Associates.

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SCG does not tolerate unethical labour practices and expects Associates to respect the rights of their employees, stakeholders and communities in:

- Providing equal opportunities
- Respecting freedom of association
- Eradicating any form of harassment or abuse
- Enhancing safety and health
- Prohibiting forced / compulsory labour
- Protecting the rights of children

*[Reference: SCG's Human Rights Policy (Ref. No. SCG/Policy/07)]*

## 5.2 Health and Safety

SCG strives to provide a safe, secure and conducive workplace environment. Associates must diligently observe and comply with all occupational health and safety, and environment laws and regulations of any country that Associates are working in and SCG's Quality, Environmental, Safety and Health Policy. Safety and health are everyone's responsibility.

*[Reference: SCG's Quality, Environmental, Safety and Health Policy (Ref. No. SCG/Policy/15)]*

## 5.3 Harassment and Violence

SCG aims to provide a safe and conducive working environment. Any harassment at the workplace, including sexual harassment, is prohibited and will not be tolerated or condoned by SCG. SCG will investigate all complaints of any harassment in confidence and proceed with the appropriate disciplinary action based on available evidence. Disciplinary action will not only be confined to the harasser but will also include the complainant if any such complaint is found to be falsely made.

## 5.4 Equal Opportunities and Non-Discrimination

SCG is committed in encouraging equal opportunities and non-discrimination at the workplace. We aim to create a culture that respects and values each

other's differences, promotes quality and diversity, and encourage individuals to grow and develop in order to realise their full potential.

Associates should also nurture a workplace environment that values and utilises the contribution of employees with diverse ideas, backgrounds, and experiences, and perspectives.

SCG encourages Associates to promote dignity and respect for all and to not tolerate direct or indirect discrimination, victimisation, intimidation, bullying or harassment in the workplace.

*[Reference: Diversity and Inclusion Policy (Ref. No. SCG/Policy/06)]*

## 5.5 Substance Misuse & Criminal Activities

The misuse of substances, such as alcohol or drugs, can impair performance at work and can be a threat to health, safety and the environment. Hence, Associates are prohibited from the unauthorised consumption, possession, distribution, purchase or sale of any such substances within SCG's premises or while conducting their businesses or being under the influence of any such substances while working.

In this respect, Associates must diligently heed and comply with policies and procedures on substance misuse issued by SCG as may be amended and updated from time to time.

## 5.6 Engaging in Political Activity

Associates shall not carry out political activities during working hours, utilizing SCG's resources or brand and should be done entirely on the Associates' own accord, volition, time and resources.

## 6.0 COMPLIANCE OF LAWS AND GOVERNANCE

Associates shall comply with all applicable laws, rules and regulations of the jurisdiction and countries where SCG operates. Associates are responsible for taking appropriate actions to understand and comply with the laws, rules and regulations that are applicable to the Associates' work.

### 6.1 Accuracy of Financial Information / Financial Integrity

Associates are responsible in ensuring its financial statements are prepared timely, accurately and conform to generally accepted accounting principles and applicable accounting standards and to all applicable laws and regulations.

Associates are expected to comply with SCG's accounting policies and internal control requirements on matters in finance, wherever appropriate. Purposely misrepresenting information or activities on company documents and reports may be considered falsification of documentation, which is a serious offence.

Associates shall allow SCG to access the Associates' financial records related to its work with SCG and report any act of misrepresentation suspected of being criminal in nature to the police or other relevant authorities.

## 6.2 Confidential Information

Associates must exercise caution and due care to safeguard any information of confidential and sensitive nature relating to SCG, which is acquired in the course of business, and are strictly prohibited to disclose to any party, unless disclosure is duly authorized or legally mandated. Accordingly, Associates are expected to enter into a non-disclosure agreement before receiving any confidential information from SCG or its employees.

In the event any Associates become aware of material information affecting SCG which has not been publicly released, the Associate shall hold such material information in the strictest confidence until it is publicly released. It is equally important that proprietary or confidential information is only disclosed to the Associates' employees on a need-to-know basis.

Associates are expected to preserve proprietary and confidential information even after the Associates' appointment / engagement has ceased or during the period of confidentiality as may be provided in the non-disclosure agreement entered into with SCG, unless disclosure is required by any order of court of competent jurisdiction or competent governmental or regulatory authority. A violation of this section may result in penalties which include monetary and/or equitable relief.

## 6.3 Internal Controls & Record Management

Associates' documents and records must comply with legal, tax, accounting, and any other applicable laws and regulations. Associates must control and maintain such records so that they are accurate, up-to-date, eligible, readily identifiable and retrievable. Associates must also ensure that all records are handled according to the appropriate level of confidentiality, in accordance with any applicable policies and procedures and in conformity with all applicable laws and regulations.

## 6.4 Information Technology

### a) Strict Prohibition

Where access is granted by SCG, Associates are strictly prohibited from accessing, distributing, or storing inappropriate or unlawful materials on SCG's computer resources or systems. Other prohibited activities include usage or wastage of computer resources for non-work-related activities,

misuse of software, and communication of trade secrets and confidential information.

b) Intellectual Property

Unless otherwise stated, any intellectual properties including but not limited to copyrights, patents, trade secrets, and other intellectual property rights associated with any concepts, works of authorship, discoveries, inventions, techniques, processes, writings, creations, programs, product improvements, plans, designs, products, manual, documents, materials, ideas, computer programs, results of technological researches, trademarks, registered designs and confidential information that were created and/or developed by you in the course of the Associates' period of engagement or appointment, shall become the sole and exclusive property of SCG and/or SCG's clients, where appropriate.

Associates shall not, without prior written consent of SCG, reproduce, adapt, modify, use or disclose intellectual properties or inventions or any information relating thereto to any person whomsoever except SCG's duly authorized parties as instructed or notified by SCG.

## 6.5 Personal Data Protection

SCG respects and are committed to the protection of the Associates personal data and privacy. SCG ensure proper and adequate protection of personal data within our control, in compliance with the Personal Data Protection Act 2010. Associates are expected to read and be familiar with Sunway Group's privacy notice as may be found on [SCG's website](#), which is compliant with the Personal Data Protection Act 2010.

## 6.6 Consequences of Breach

In the event that SCG, to the best of its knowledge and sole discretion, determines or have reasons to suspect that Associates have been investigated or is being investigated or is subject to a pending investigation or is involved in an investigation (as a witness or suspect), remanded, charged, convicted under any laws, or have breached SCG's policies or this Code, SCG may take appropriate action against Associates including but not limited to disqualification, blacklist, de-registration, suspension, termination, forfeiture of monies including retention sums and forfeiture of bonds or deposits, and/or withholding any payments due or to be due or any other appropriate measures including reporting to an relevant authorities or initiating civil proceedings.

## 7.0 AUDITS AND NON-COMPLIANCE

7.1 SCG reserves the right, at its sole discretion, to conduct audits on Associates at any time during the term of their engagement. These audits may include, but are not limited to, financial audits, compliance audits, operational audits,

and any other reviews deemed necessary to assess Associates' adherence to contractual obligations, applicable laws and regulations, and SCG's policies, including but not limited to this Code and SCG's ABAC Policy.

7.2 SCG may appoint internal or external auditors to carry out such audits, and Associates shall provide full, prompt, and unrestricted cooperation. This includes granting access to relevant records, financial statements, systems, processes, premises, and personnel as reasonably required for the purposes of the audit. All documentation requested by the auditors shall be provided in a timely and accurate manner.

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7.3 Failure to cooperate with an audit, including refusal to provide required access or documentation, may be deemed a material breach of contract and may result in remedial action, such as termination, suspension, or other appropriate measures.

7.4 Associates may seek advice from SCG's Compliance Function Team ("CFT") or respective project persons-in-charge ("PIC") when you are unsure of an appropriate or ethical course of action under this Code.

## 8.0 WHISTLEBLOWING

If Associates encounter actual or potential violations of this Code, Associates are required to report their concerns immediately to the CFT, their respective project PICs or reach out directly to the Head of Internal Audit via SCG's Whistleblowing platform as follows:

- a) **Whistleblowing Hotline** : +603 5639 8033
- b) **Email** : [whistleblowing.SCG@sunway.com.my](mailto:whistleblowing.SCG@sunway.com.my)
- c) **Direct Contact** : Head of Internal Audit – SCG or  
The Chairman of Audit Committee – SCG  
+603 5639 8301
- d) **Mail** : Internal Audit Department  
Level 4.2, Menara Sunway,  
Jalan Lagoon Timur, Bandar Sunway,  
47500 Selangor Darul Ehsan, Malaysia

*[Reference: Whistleblowing Policies and Procedures (Ref. No. SCG/Policy/04)]*

## 9.0 COMMUNICATION AND AWARENESS

SCG will communicate this Code to Associates regularly. This Code is available on SCG's website. Additionally, periodic training on ethical conduct, anti-corruption, and reporting channels will be provided.

## 10.0 REVIEW

- 10.1 This Code shall be reviewed regularly, once in every three (3) years, or earlier if required, by changes in laws, regulations, standards, or circumstances to ensure its continued relevance. Any amendments must be approved by the Board of Directors and communicated to employees and stakeholders.

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