

SUNWAY®

**CODE OF CONDUCT &
BUSINESS ETHICS POLICY**

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An aerial photograph of a cityscape featuring a large, irregularly shaped lake in the center. The lake is surrounded by lush green trees and several buildings, including a prominent tall skyscraper with a distinctive top. The sky is a mix of blue and light purple, suggesting a sunset or sunrise. The text 'Objective' and 'Scope' is overlaid on the image in a bold, dark blue font.

Objective

Scope

1. OBJECTIVE

The objective of the Code of Conduct and Business Ethics (the “Code”) is to provide guidance on the behaviours expected of each and every employee, including Directors of the Sunway Berhad Group. In Sunway, we align our actions and behaviours with the Group’s Core Values.

2. SCOPE

The Code is applicable to all employees, including Directors of Sunway Berhad Group (the “Group”). The Code applies to all businesses and countries in which the Group operates.

An aerial photograph of Sunway City, showing a large lake in the center, surrounded by modern buildings and greenery. The text is overlaid on this image.

Sunway Vision & Mission

Core Values

Sustainable Development

“Travel the path with integrity as our guide, humility as our virtue and the pursuit of excellence as our choice”- Tan Sri Dato’ Seri Dr. Jeffrey Cheah

3. SUNWAY VISION & MISSION

Vision

- To be Asia's model corporation in sustainable development, innovating to enrich lives for a better tomorrow

Mission

- Empowering our people to deliver enhanced value to all stakeholders
- Embracing sustainability in our business processes and decisions
- Attracting and nurturing a talented and progressive workforce for the digital era

4. SUNWAY CORE VALUES

As a diversified group, our purpose, vision and mission are synonymous throughout the Group to deliver our best and to do business with a heart. To ensure a greater focus on win-win relationships with our customers and stakeholders, we 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

5. SUSTAINABLE DEVELOPMENT

At Group, we are doing our part towards building a sustainable future for all in this part of the world that we call home. For more than four decades, we have worked to develop the skills, strength, knowledge and technology for us to achieve this goal. Our stakeholders – including customers, staff, shareholders and business partners – are all deeply involved and committed towards this agenda. We constantly strive to incorporate sustainability into our business practices, processes and operations.





Act with Integrity and Ethics

6. ACT WITH INTEGRITY & ETHICS

(a) Anti-Bribery & Corruption

We have adopted a ZERO TOLERANCE policy against all forms of bribery and corruption. We are committed to conduct our business in accordance with the Malaysian Anti-Corruption Commission (MACC) Act 2009 and the MACC (Amendment) Act 2018 and any other applicable laws. *R1 (Reference list as shared below)*

(b) Giving & Accepting of Gifts, Entertainment and Hospitality

We have adopted a “No Gift” Policy whereby, you are prohibited from, directly or indirectly, receiving or providing gifts, entertainment and hospitality subject only to certain narrow exceptions. It is your responsibility to inform any third parties involved in business dealings with Sunway of the “No Gift” Policy and to request all parties to understand, respect and adhere to the policy. *R2 (Reference list as shared below)*

(c) Donations and Sponsorship

We always seek avenues in which we can contribute to the community through donations, sponsorships and corporate responsibility programmes. Therefore, it is your responsibility to understand that payments for donations, sponsorships and corporate responsibility programmes are made in full compliance with the Donation, Sponsorship and Corporate Responsibility Policy, Anti-Bribery and Corruption Policy, the Anti-Money Laundering Policy, and any applicable laws and regulations. All requests must be channeled to the Group Brand Marketing and Communications department for approval and it must also reflect our Core Values and be compatible with our business activities. *R3 (Reference list as shared below)*

(d) Anti-Money Laundering

We prohibit all practices related to money laundering, including dealing in the proceeds of criminal activities and terrorism financing. As a general rule, reasonable degree of due diligence must be carried out in order to understand the business and background of any prospective customer, vendor, third party or business partner that intends to do business with the Group to determine the origin and destination of money or assets involved. Any suspected activities relating to money laundering or terrorism financing should be reported immediately to Bank

Negara Malaysia and relevant authorities in accordance with the Group's Anti-Money Laundering Policy. *R4 (Reference list as shared below)*

(e) Insider Trading

As a public listed company, we are 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. Do not buy or sell and do not recommend or suggest anyone else buy or sell the securities of any company in the Group either directly or indirectly when you are aware of insider information about the Group, for personal benefit. A violation of this policy can result in civil and criminal penalties. *R5 (Reference list as shared below)*

(f) Fraud

You must not engage in any form of fraudulent acts or dishonest conducts involving property or assets, or on the financial reporting and accounting of Sunway or third party. This may not only entail sanctions but also result in criminal charges.

(g) Dealing with Competitors

We are committed to compete ethically in the marketplace. You are required to comply with competition and anti-competition laws in the countries in which the group operates. Whenever there is a need to collect, share and use information about our competitors, it must be done in a legal and ethical manner. *R6 (Reference list as shared below)*

(h) Avoid Conflict of Interest

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 employee or a professional. You must avoid such conflicts and situations that may be perceived as creating a conflict of interest that may influence your judgment in the discharge of your duties and responsibilities. You must not use your position, working hours, Group resources and assets, relationships or any knowledge that is gained directly or indirectly in the course of your duties or employment for private or personal advantage either directly or indirectly.

It is your direct responsibility to declare any situation of conflict in the areas such as financial benefit, personal relationship and personal benefit / involvement, through the company's annual exercise of Conflict of Interest Declaration and within two weeks of any change in the status.

As a full time employee, you must obtain prior approval from the company if you wish to engage in any outside employment to ensure it will not interfere or compete with your regular work and/or give rise to an actual or perceived conflict of interest or the use of Company's asset. This includes holding a second job, providing services, conducting a business and/or active involvement in other organisations.

The onus of declaring any actual or perceived conflict of interest shall be on you. You should self-disclose and any non-declaration will be deemed as a major misconduct and may warrant immediate dismissal. If you are not clear whether the situation is a conflict of interest, you must check with your BUHR for clarification. *R7 (Reference list as shared below)*

(i) Company's Property & Benefits

The Group's property forms an integral part of the business infrastructure and any loss, damage, misuse and waste thereof is a serious misconduct. Do not use Group's assets and benefits for your personal use or to the benefit of anyone else who are not allowed or authorised by the company.

A photograph of two hands shaking, symbolizing agreement or partnership. The hands are positioned in the center of the frame, with fingers interlaced. The background is a light, neutral color. The text 'Working with One Another' is overlaid on the hands in a bold, dark blue font.

Working with One Another

7. WORKING WITH ONE ANOTHER

(a) Health & Safety

We strive to provide a safe, secure and conducive workplace environment. You must diligently observe and comply with all Occupational Health, Safety and Environment laws and regulations of any country that you are working in and the Group's OHSE requirements, policies and procedures. Safety and health is everyone's responsibility.

(b) Harassment & Violence

We aim 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 the Company. The Company 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 have been falsely made. *R8 (Reference list as shared below)*

(c) Equal Opportunities and Non-Discrimination

We are committed in encouraging equal opportunities at the workplace. We aim to create a culture that respects and values each other's differences, promotes equality and diversity, and encourage individuals to grow and develop in order to realise their full potential. We nurture a workplace environment that values and utilises the contribution of employees with diverse ideas, backgrounds, experiences, and perspectives for the growth of Sunway Group and the success of the customer and communities we serve. We promote dignity & respect for all and do not tolerate direct or indirect discrimination, victimisation, intimidation, bullying or harassment in the workplace. *R9 (Reference list as shared below)*

(d) 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, it is the Group's policy that the unauthorised consumption, possession, distribution, purchase or sale of any such substances within its premises or while conducting its businesses or being under the influence of any such substances while working is prohibited. In this respect, you must diligently heed and comply with the policies and procedures on substance misuse issued by Sunway as amended and updated from time-to-time. *R10 (Reference list as shared below)*

(e) Social Media

You have the responsibility to protect the Group's brand reputation and image. When using your private social media accounts, you must indicate that your posts reflect only your personal opinions and do not negatively affect the Group's brand perception. You must also safeguard confidential and proprietary business information and not disclose internal information to people outside of the Group.

(f) Engaging in Political Activity

Your participation in political activity shall not be carried out during company working hours, utilising company resources or brand, and should be entirely on your own accord, volition, time and resources.

(g) Managers' Responsibility

If you hold a managerial position, you are responsible for the enforcement of and compliance with this Code including necessary distribution to ensure employees' knowledge and compliance to this Code. You are to ensure that the employees you supervise understand and practice the Code in their day-to-day activities. You have the responsibility to ensure that employees feel safe and comfortable to provide any feedback related to job and performance.

(h) Dress Code and Uniform

As a proud Sunwayian, you represent the image of Sunway. You are required to be properly attired as prescribed in the Dress Code Policy or as per BU's dress code requirement at all times during working hours whilst in the office premises. The policy is also aimed at creating a professional outlook for Sunway Group through its staff. Therefore, it is imperative you must exercise self-discipline and conformity to the policy. *R11 (Reference list as shared below)*



**Ensure Compliance of Laws and
Governance**

8. ENSURE COMPLIANCE OF LAWS & GOVERNANCE

We will comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions and countries within which the Group operates. You are responsible for taking appropriate actions to understand and comply with the laws, rules and regulations that are applicable to your positions and/or work.

(a) Accuracy of Financial Information / Financial Integrity

All books, records and accounts must be controlled and maintained so that they are prepared timeously, and conform to generally accepted and applicable accounting principles and to all applicable laws and regulations. You are responsible for ensuring that Sunway books and records accurately, fairly and reasonably reflect the substance of transactions. You must comply with company accounting policies and internal control requirements on matters in finance. Purposely misrepresenting information or activities on company documents and reports may be considered falsification of documentation, which is a serious offence. Sunway reserves the right to report any act of misrepresentation suspected of being criminal in nature to the police or other relevant authorities.

Falsification of financial or any other records or misrepresentation of information may constitute fraud and can result in civil and criminal liabilities for Directors, Employees and the Group. You are obliged to report false entries or omissions, and to highlight questionable or improper accounting in the books and records of the Group to the relevant parties.

(b) Confidential Information

You must exercise caution and due care to safeguard any information of confidential and sensitive nature relating to the Group, which is acquired in the course of your employment, and are strictly prohibited to disclose to any party, unless the disclosure is duly authorised or legally mandated.

In the event you know of material information affecting the Group which has not yet been publicly released, the material information must be held in the strictest confidence by you until it is publicly released. It is equally important that propriety or confidential information is only disclosed to other employees on a need-to-know basis.

You have an obligation to continue to preserve the proprietary and confidential information even after your appointment/ employment has ceased, unless disclosure is required of any order of any court of competent jurisdiction or any competent judicial, governmental, or regulatory authority. A violation of this policy can result in civil and criminal penalties.

(c) Internal Controls & Record Management

The Group's documents and records are meant for business purposes and requirements, compliance with legal, tax, accounting and regulatory laws. You must control and maintain such records so that they are accurate, up-to-date, eligible, readily identifiable and retrievable. You 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.

(d) Information Technology

(i) Strict Prohibition

You are strictly prohibited from accessing, distributing, or storing inappropriate or unlawful materials on the computer resources. Other prohibited activities include usage or wastage of computer resources for non-work related activities, misuse of software, and communication of trade secrets. *R13 (Reference list as shared below)*

(ii) Information and Assets

The Group values and protects all proprietary and confidential information, and is committed to protecting its assets and resources. You are expected to exercise reasonable care to safeguard the Group's assets to avoid any loss, damage, misuse or theft. In addition, you must safeguard proprietary, confidential information, plus personally identifiable information at all times to prevent harm to the Group, our shareholders, and individuals or other third parties that have trusted us with their information. Any access to proprietary, confidential information, plus personally identifiable information via personal devices are highly discouraged. However, due to unavoidable circumstances, those required to access via personal devices will require HOD approval and security review by IT SSC Administrators. *R13 (Reference list as shared below)*

(iii) Intellectual Property

We encourage you to be inventive and innovative as it is part of your normal duties and responsibilities. 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, manuals, 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 your employment and / or by using the Company's resources, shall become the sole and exclusive property of the Group. You should not, without prior written consent of the Company, reproduce, adapt, modify, use or disclose intellectual properties or inventions or any information relating thereto to any person whomsoever except to the Company's duly authorised parties as instructed or notified by the Company. *R13 (Reference list as shared below)*

(e) Representing Sunway Externally

You must obtain prior approval from respective BU Heads or Functional Heads before you accept external invitations to give speeches, presentations or describe your job nature in the Company.

(f) Personal Data Protection

We respect and are committed to the protection of your personal data and your privacy. We ensure proper and adequate protection of personal data within the control, in compliance with the Personal Data Protection Act 2010. If you have access to personal data, you are expected to read and be familiar with Sunway Group's Personal Data Protection Compliance Manual, which is designed to assist you in handling personal data and sensitive personal data in the manner that is in compliance with the Act. The Compliance Manual is also pertinent as a guide as to the do's and the don'ts in relation in the handling, retention and destruction of personal data and sensitive personal data. *R14 (Reference list as shared below)*

(g) Laws & Regulations

You shall comply with all Federal and State laws, regulations, and ordinances that are applicable to your work and responsibilities. If you are found to have been in violation of any applicable Federal and State laws, regulations and ordinances, such violation may be the basis for your disciplinary action, including termination of employment.

(h) Annual Staff Declaration

You are required to read, understand and to declare in writing annually, by the first quarter of each year, that you will abide to the following mandatory policies:

- Anti-Bribery and Corruption Policy,
- Code of Conduct and Business Ethics Policy,
- Conflict of Interest Declaration Policy; and
- E-Policy.

9. NON-COMPLIANCE

Non-compliance to this policy will be taken very seriously and may result in disciplinary action, including termination as well as civil or criminal proceedings. Seek advice from BU Leadership Team and BUHR when you are unsure of an appropriate or ethical course of action under this policy.

10. WHISTLEBLOWING

If you encounter actual or potential violations of this policy, you are required to report your concerns immediately to your BU Leadership Team or reach out directly to the Head of Group Internal Audit via our Whistleblowing platform as follows: *R15 (Reference list as shared below)*

Email to: whistleblowing@sunway.com.my

Direct line: +603 5639 8025

Fax to: +603 5639 8027

Write to:

Head of Internal Audit Department

Level 4, Menara Sunway

Jalan Lagoon Timur, Bandar Sunway

46150 Petaling Jaya

Selangor Darul Ehsan, Malaysia.

REFERENCE LIST OF RELATED POLICIES

| Reference Number | Policy Name |
|------------------|---|
| R1 | Anti-Bribery and Corruption Policy |
| R2 | Gift, Entertainment and Hospitality Policy |
| R3 | Donation, Sponsorship & Corporate Responsibility Policy |
| R4 | Anti-Money Laundering Policy |
| R5 | Insider Trading |
| R6 | Anti- Competition |
| R7 | Conflict of Interest Declaration Policy |
| R8 | <i>Sexual Harassment Policy</i> |
| R9 | Diversity and Inclusion Policy |
| R10 | Alcohol and Drug Abuse Policy |
| R11 | Dress Code Policy |
| R12 | Human Rights Policy |
| R13 | E-Policy |
| R14 | Personal Data Protection Compliance Manual |
| R15 | Whistle Blowing Policy |

The above policies can be viewed at our Sunway Portal:

<https://one.sunway.com.my/hrportal/policies>

History Log (Last Page)

| Date | Details of Reviews | PIC |
|--------------|---------------------------|----------------------------|
| 20 July 2015 | New | GHR and BUHR & Group Legal |
| 20 Nov 2020 | Reviewed the whole Policy | GHR |