

MALPAC HOLDINGS BERHAD CODE OF ETHICS

August 2016

Covered Persons

The code applies to all Malpac Holdings Berhad and its subsidiaries (“Group”) personnel and directors.

Standards of Business Conduct

All Covered Persons shall conduct all business dealings in ethical and moderate manners. When in doubt, Covered Persons should seek advice from respective supervisors and/or other appropriate personnel.

Conflict of Interest

All Covered Persons shall have an affirmative duty of care, loyalty and honesty and good faith in the best interests of the Group. Covered Persons shall fully disclose all material facts concerning any conflict to their supervisors and/or other appropriate personnel.

Protection of Material Non-Public Information

All Covered Persons shall not disclose any confidential information pertaining to the Group, its clients and potential clients to the public. All confidential information shall only be shared with personnel directly involved in the particular business transactions.

Compliance with Malaysian Laws

All Covered Persons are required to abide by all applicable Malaysian laws.

Violations of the Code

Violations of the Code may result in disciplinary action including but not limited to warnings, fines or termination of employment.