

### Internal Governance Body

Malpac's ethics and compliance program is governed and overseen by the Audit Committee of the Board of Directors. All directors, senior management, managers and employees ("Malpacians") are advised to read this Code carefully and **MUST** behave and adhere to the guidelines specified herein.

### Checking Mechanism

If you are not sure if your actions comply with our Standards of Conduct, please check:



### Standards of Conduct

We operate Malpac as an honest, legal, ethical and trustworthy business partner whereby we treat others with respect and maintain fairness in all relationships. We are responsible for the consequence of our actions and we will admit mistakes if committed and provide immediate corrective actions for the wrongdoings. All Malpacians are committed to grow our shareholders' values and safeguarding their investment legally and ethically and our corporate Code of Ethics and Conduct are as follow:

#### 1. Our Commitment for the Shareholders

##### 1.1 Integrity of financial statements and regulatory filings

All transactions and balances are timely and accurately recorded, classified and reported in accordance with the international accounting standards (IFRS). All information in the statutory financial statements and tax filings must be accurate and must comply with applicable accounting principles and legal requirements.

##### 1.2 Avoiding conflicts of interest

All Malpacians must be loyal to Malpac and always act in the company's best interests. All Malpac employees and directors shall avoid any personal investments, compromise any terms and conditions for personal interests or compromise the judgment and ability to act in Malpac's best interests that could give rise to conflicts of interest. If any Malpacians are not certain, he/she shall disclose any of the potential relationships, associations or activities that could create conflicts of interest.

##### 1.3 Avoiding insider trading

Malpac expects all Malpacians should never use or disclose material non-public information prior to its official public release. Material non-public information is the information that a reasonable shareholder

would consider important in making a decision to buy or sell stock, for example: financial information pending announcement, mergers or acquisitions, supplier and customer relationships, major new corporate developments/investments, changes in senior management. Insider trading occurs when an individual with knowledge of material non-public information about a company uses it to gain profits or avoid losses in the stock market and/or fixing suppliers, contractors' prices for profits.

#### 1.4 Theft & Fraud

Theft and fraud are crime in Malaysia and will not be tolerated in Malpac. Any Malpac member who engages in or assists others with theft or fraud will be subject to disciplinary action up to and including termination and will also be subject to prosecution.

#### 1.5 Responsible travel and entertainment

All Malpacians shall be truthfully, accurately and completely record travel and entertainment expenses and use the company funds only for legitimate business purposes and do not spend more than necessary.

#### 1.6 Giving and accepting gifts and entertainment

Gift giving and entertaining among business partners can be appropriate ways to show appreciation, develop deeper understanding and build goodwill. All Malpacians shall use sound judgment, comply with the law and never allow gifts, entertainment or other personal benefits to influence any business decisions.

#### 1.7 Safeguarding our other confidential information

Malpac confidential information, including intellectual property, trade secrets, contract terms and conditions are tremendously valuable assets for the shareholders. Every Malpac member is responsible for the appropriate protection of these important assets. Malpac confidential information belongs to Malpac and non of the Malpacians maybe use it for personal gain and even if you leave Malpac, you are still legally and contractually obligated to maintain the confidentiality of Malpac's information.

## 2. Our Commitment for Business Partners, Communities and Society

#### 2.1 Provide and accept high quality products to/from our investment partners

Malpac is committed to providing or accepting high quality propositions which consistently offer value that is in compliance with laws and dependable. All products must meet applicable legal and regulatory requirements as well as the quality expectations of our customers.

#### 2.2 Protecting the privacy of customer personal information

All Directors, Management and Employees shall respect our customers and earn the trust of our customers by keeping personal information safe and complying with the privacy and data protection laws of the countries in which we do business.

#### 2.3 Anti-bribery and anti-corruption

Never provide anything of value that could be perceived as a payment in order to obtain or retain business with Malpac or obtain an improper business advantage with a government official. Malpac do not tolerate bribery or corruption, regardless of where we are located or where we do business.

#### 2.4 Anti money-laundering

All Malpacians must comply strictly and shall not violate any laws pertaining to Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (AMLA). All transactions that risk violating AMLA shall be prohibited.

#### 2.5 Compliance with laws

Malpac deals with investment opportunities and business partners around the world. Due to the nature of the business, all Malpacians shall comply with applicable country laws regarding import or export of goods and services, taxes, duties, alterations and development of buildings. No business activities shall be carried out without obtaining required licenses and permits.

#### 2.6 Protecting the environment

Malpac are environmentally responsible in selection of investment opportunities, in the design and provision of our developments and in the operation of our assets, selection of suppliers, consultants and other business activities. We operate Malpac to conserve resources, minimize harmful impacts on the environment and prevent pollution.

Last updated on 25 June 2020.