

CAB CAKARAN CORPORATION BERHAD

(200201015998) (583661-W)

(Incorporated in Malaysia)

CODE OF ETHICS AND CONDUCT**1.0 Purpose and Scope of the Code**

- 1.1 This Code of Ethics and Conduct (“the Code”) covers a wide range of business practices and procedures help to guide actions and behaviors while working for and or dealing with CAB Cakaran Corporation Berhad (“the Company”) and its subsidiary (“CAB Group”). The Code does not cover every issue that may arise, but it sets out basic principles applies to all the directors and employees of CAB Group including full-time or permanent employees, part-time employees, employees on probation, trainees and interns, employees on secondment and personnel on fixed-term contracts (collectively referred to as “**Employees**”).
- 1.2 The standards set out in the Code require the Employees to display the highest levels of professionalism in all aspects of their work when deal with any individual or organization which comes into contact with during the course of his/her work, includes existing and potential customers, competitors, suppliers, contractors, distributors, business contacts/partners, agents, advisers, regulators, government and public bodies and officials, shareholders, investors and the community in which the CAB Group operates in.

2.0 Responsibility and Compliance with the Code

- 2.1 The Employees are responsible to act in accordance with the policies, principles and guidelines detailed in this Code. Any violation or suspected violation of this Code shall be reported to:
- (i) the Managing Director of the Company (in the case of any Director);
 - (ii) the Company’s Head of Human Resources Department or line managers; or
 - (iii) in accordance with the CAB Group’s Whistle-blowing Policy; and
- the CAB Group will keep confidential the identity of the Employees reporting a possible non-compliance of the Code.
- 2.2 Failure to comply with the Code may result in the commencement of disciplinary proceedings invoked against the Employees. Notice shall be issued by the



Company to the Employees from time to time and it is the responsibilities of the Employees to keep abreast of the latest update of this Code.

- 2.3 The principles in the Code shall be read and applied in conjunction with all other related or applicable policies, procedures and guidelines of the CAB Group. The principles in the Code shall be taken into consideration shall there be any overlap over the Group's other policies.
- 2.4 The CAB Group also expects its customers, suppliers and other business partners, including contractors and their respective subcontractors to comply with the Code in their dealings with CAB Group. Our selection must be based on the track records, quality of their products and services. Our relationship with them should be purely professional in order to maintain independence in our business judgments.

3.0 Compliance With Laws, Rules And Regulations

- 3.1 The CAB Group operates in a highly regulated business environment and its activities are subject to numerous laws, regulations and licensing conditions. The Employees have the responsibility to comply with all the laws that applicable to the CAB Group businesses activities.
- 3.2 If in any doubt, the Employees shall refer to his or her Head of Department or the Company's Head of Human Resources Department for clarification or guidance.

4.0 Fair Dealing and Equality in Employment

- 4.1 The CAB Group will compete effectively and fairly in the markets in which it operates. The Employees should always consider the rights of and deal fairly and ethically with the Group's customers, suppliers, competitors and other business partners. The Employees should not take unfair advantage of anyone through illegal trade practice.
- 4.2 The Employees are expected to follow all the competition laws. The Employees are prohibiting from:
- (i) discuss prices, sales plans or volumes with competitors;
 - (ii) divide customers, markets or customers, markets or territories with competitors;
 - (iii) agree with others to limit production or not do business with customers or suppliers.
- 4.3 The CAB Group is committed to developing and maintaining a diverse workforce and to provide a work environment in which every employee is treated fairly and



with respect, and every employee can contribute to business success and to realise their potential.

- 4.4 The CAB Group provides equal employment opportunity and anti-discrimination in the workplace and strive to ensure that employment opportunities properly reflect gender, ethnicity and age of the Malaysian demographics.

5.0 Preventing Bribery and Corruption

- 5.1 The Employees of the CAB Group shall not get involve in bribery and corruption practices in whatsoever form. The CAB Group will not tolerate any Employee found being involved in bribery, whether by offering, promising, soliciting, demanding, giving or accepting bribes or behaving corruptly in the expectation of a bribe or an advantage. This policy extends to all the CAB Group's business dealings and transactions in all countries in which it or its subsidiaries operate.
- 5.2 The Employees are required to understand and strictly comply with all the anti-corruption laws and regulations including but not limited to Malaysia Anti-Corruption Act.

6.0 Gifts, Meals, Entertainment and Any Other Benefits or Privileges

- 6.1 As a general rule, the Employees are discouraged from soliciting or accepting any gifts, meals, entertainment, and any other benefits or privileges (collectively referred to as "Benefits") to or from customers, suppliers and other business partners. Notwithstanding this, the CAB Group recognises that the occasional acceptance or offer of the Benefits which are of socially acceptable nature and value, are acceptable as part of the normal course of business in promoting goodwill and reinforce strong business relationships.
- 6.2 Generally, all invitations to business luncheons or dinners may be given or accepted by Employees. Employees receiving or giving any Benefits is responsible for assessing whether it is appropriate and within the boundaries set out in this Code.
- 6.2 The following guidelines shall be observed:
- (i) Employees should not give or accept any Benefits that would in any way influence or appear to influence any business decision or attempt to gain an unfair business advantage;



- (ii) The situation in which the Benefits is received or given should not be connected with contractual negotiations, tender awards or similar circumstances;
- (iii) Employees should not give or accept any Benefits which is extravagant or excessive. The value of the Benefits should be reasonable and ethical practices of the marketplace.
- (iv) Employees should reject any Benefits from customers, suppliers and other business partners if it would create the appearance of a conflict of interest; and
- (v) Employees with question and doubt about whether accepting or giving any Benefits is appropriate, should consult their HOD or Group HR Department.

7.0 Conflict of Interest

Generally, COI refers to situations where –

- (a) the interests of the said person (who is often a person in a position of trust), interfere, or appear to interfere, with the interests of the listed issuer or its subsidiaries (“listed issuer group”); or
- (b) the said person has interests that may make it difficult to perform his or her role objectively and effectively.

A COI occurs when a person’s personal interests conflict with their responsibility to act in the best interests of the Group’s business. Personal interests include direct interests as well as those of family, or other organizations a person may be involved with or have an interest in.

A COI may be actual, potential or perceived and may be financial or non-financial. These situations present the risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of the Group and must be managed accordingly.

As quoted in ICN 1/2023 Guidance on Conflict of Interest, the examples warranting disclosure consist of, but not limited to –

- (a) uses property or resources of the listed issuer group for his or her personal purpose of business;



- (b) channels benefits or resources meant for the listed issuer group to a company which he or she has an interest in;
- (c) discloses trade secrets to a competitor where he or she has an interest in;
- (d) influences decision of the property developer listed issuer to develop an area where the said person owns property so that he or she will also enjoy the benefit either financially (e.g. capital appreciation of the property) or non-financially (e.g. convenience from the infrastructure developed) from such development;
- (e) prioritises his or her private venture by depriving the listed issuer from an identified business opportunity;
- (f) leverages on the listed issuer's business or developmental plan by acquiring adjacent lands using the said person's private company;
- (g) is involved in a business which offers similar products or services that are likely to replace or substitute the products or services offered by the listed issuer group;
- (h) holds offices or directorships in competitors of the listed issuer group;
- (i) provides financial assistance to, or receives financial assistance from, the listed issuer group on terms and conditions which are more favourable to the said person than normal commercial terms.

8.0 Insider Trading

Insider trading is illegal by law. This includes the use of or disclosure of price sensitive information for personal benefit or for the benefit of others. All non-public information about the CAB Group should be considered price sensitive information. The Employees who have access to price sensitive information about the Group or any other entity are not permitted to use or share that information to trade in the securities of the Company or the other entity's securities, or for any other purpose except for the conduct of the Group's business.

9.0 Safety and Health

- 9.1 The CAB Group strives to provide a safe and healthy working environment for the Employees, customers, suppliers and contractors to ensure that the CAB Group will reduce the environment impacts of its business activities and will seek to do this through continual improvement of environmental performance, protection and safety.
- 9.2 The Employees are responsible to maintain a safe and healthy workplace by following health and safety laws and company requirements that apply to their jobs. Employees must also take precautions to protect themselves, their fellow employees and visitors to CAB Group's facilities and report any incidents or unsafe practices and injuries they witness to their manager.



- 9.3 The Employees are expected to perform the CAB Group related work in a safe manner, free of the influences of alcohol, illegal drugs or controlled substances.

10 Confidentially, Privacy and Protecting of Company Assets

- 10.1 The Employees must keep confidential all information that would reasonably be considered to be confidential, including but not limited to terms and conditions of contracts entered into by the CAB Group, the Employees and customer details, performance and financial details, and policies and procedures of the CAB Group.
- 10.2 In recognizing the importance of respecting the privacy rights of individuals, the CAB Group also committed to ensuring compliance with the requirements of applicable laws relating to protection of personal data (e.g. the Malaysian Personal Data Protection Act 2010). Therefore, it is the responsibility of all the Employees to comply with such laws.
- 10.3 The Employees should be responsible to protect and safeguard the CAB Group's assets and to ensure that they are for the CAB Group's purposes only. Any suspected incident of fraud or theft should be immediately reported for investigation.
- 10.4 The Employees must maintain the confidentiality of the CAB Group's proprietary information which includes, but not limited to intellectual property such as trade secrets, patents, trademarks and copyrights, data and technical know-how, business plan and budget, product design, marketing and service plans, customer list and information, manufacturing ideas, designs, databases, records, salary information, and any unpublished financial data and reports entrusted to them by the CAB Group or its customers or suppliers except when disclosure is required by laws or regulations. This obligation continues beyond the termination of employment.
- 10.5 Unauthorized use or distribution of this information will not be tolerated. Appropriate disciplinary and / or legal action will be taken.

11.0 Prompt Communications

The Employees must make every effort to achieve complete, accurate, and timely communications by responding promptly and courteously to all proper requests for information and to all complaints.

12.0 Proper Records and Communications



Accurate and reliable records are necessary to meet the CAB Group's legal and financial obligations and to manage the affairs of the Group. The CAB Group's books and records must reflect in an accurate and timely manner for all business transactions. Employees are responsible to retain and store proper records in compliance with company policy, legal and regulatory requirements.

13.0 Administration

The Code may be updated from time to time subject to the Approval by the Board.

This Code of Ethics and Conduct was reviewed, approved and adopted by the Board on 28 February 2024.

