



CODE OF BUSINESS CONDUCT AND ETHICS

Our **PRIDE** in Business

26 MAY 2025

KUMPULAN PERANGSANG SELANGOR BERHAD'S CODE OF BUSINESS CONDUCT AND ETHICS

Kumpulan Perangsang Selangor Berhad ("**KPS Berhad**" or "**Company**") being a responsible corporate citizen is strongly committed to the highest standard of conduct in all its business dealings and its relationships with its Employees, customers, shareholders, stakeholders, regulators, and the public at large based on the fundamental guiding principles and standards applicable to the Directors such as Guidelines on Conduct of Directors of Listed Corporations and their Subsidiaries (GCD) and Malaysian Code on Corporate Governance (MCCG) issued by Securities Malaysia (SC) and KPS's underlying core values of Pride, Respect, Integrity, Discipline and Extra Mile ("**PRIDE**").

Furthermore, the Company aspires for this Code of Business Conduct and Ethics ("**COBE**") to uphold, adhere and integrate the key elements of Malaysia's National Action Plan on Business and Human Rights for the period 2025-2030, throughout the Group.

This COBE applies to everyone, including all the Directors, Managements and Employees of KPS Berhad and its subsidiary companies ("**KPS Berhad Group**" or "**Group**") and others who perform services for the Group. This COBE helps everyone to focus on areas of ethical business conduct; provides guidance in recognising and dealing with ethical issues; and provides mechanisms to report unethical conduct without fear of retribution.

All of the Directors, Managements and Employees shall comply with the spirit of this COBE which serves as a set of guiding principles in the performance and exercise of their responsibilities as Director or Employees of the relevant companies within the Group.

This COBE is not intended to be exhaustive. It should be read together with the existing governance framework of all relevant laws and regulations, integrated into Company-wide management practices as well as the directives and policies of the Group including any relevant best practices/ standards in corporate governance and provisions of the constitutions of companies within the Group.

In this COBE, the expressions "KPS Berhad Group", "Group" and "KPS Berhad" are used interchangeably to refer to KPS Berhad Group of companies in general. Similarly, the words "we", "our", "us" and "you" are used to refer to KPS' Berhad Group of companies including all of its Directors and Employees. Where applicable, the word "you" is used to refer to the Counterparties and Business Partners.

KPS BERHAD CORE VALUES

Our Core Value is our commitment in conducting our good behaviour in achieving our business goals and objectives, while maintaining competitiveness and strong brand reputation.

Pride

Take pride in performing our duty, acting in good faith and in the best interest of KPS Berhad Group, its shareholders and stakeholders and commit to its success.

Respect

Recognise the value of others and accept differences.

Integrity

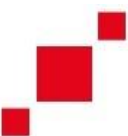
Must act with Integrity and its conduct is guided by responsibility and accountability.

Discipline

Perform with team spirit guided by clear rules of work discipline.

Extra-Mile

Contribute to stakeholders' growth by "Going the Extra-Mile" in business activities and development of the Company.



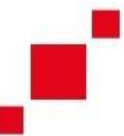
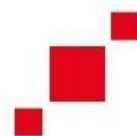
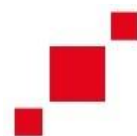


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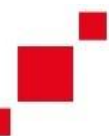


PURPOSE

SCOPE

**GUIDING
PRINCIPLES
OF COBE**

**RESPONSIBILITY
AND COMPLIANCE
WITH COBE**



1.0 PURPOSE

This COBE provides guidance and set common ethical standards to promote consistency in behaviour across all levels of employment. This COBE governs the actions and working relationships of board members and top Management with Employees and in dealings with other stakeholders, and where applicable, Counterparties and Business Partners. The standards of behaviour are derived from KPS Berhad's underlying core values of PRIDE.

2.0 SCOPE

- 2.1 The fundamental standards of integrity under which KPS Berhad operate do not vary depending on where KPS Berhad work or who it is dealing with.
- 2.2 KPS Berhad requires that all Employees, Directors and officers comply with all laws, rules and regulations applicable to the Group wherever it does business. To promote compliance with such laws, rules and regulations, this COBE also applies to all individuals working for the Group, including the board of Directors and other individuals elected, contracted or otherwise engaged to work for or on behalf of KPS Berhad or the Group, including third party representatives and other service providers. External providers are also expected to comply with this COBE in relation to all work conducted with KPS Berhad or the Group, or on its behalf.

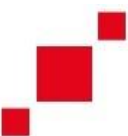
3.0 GUIDING PRINCIPLES OF THE COBE

- 3.1 The guiding principles of COBE are in line with the aspirations of KPS Berhad's core values as in "**PRIDE**" acronym as follows:
 - a. **Pride**
The Directors, Management and Employees take pride in performing their duty, acting in good faith and in the best interests of the Group, its shareholders and stakeholders and commit to its success.
 - b. **Respect**
The Directors, Management and Employees should recognise the value of others and accept the differences.
 - c. **Integrity**
The Directors, Management and Employees must act with integrity and its conduct is guided by responsibility and accountability.
 - d. **Discipline**
The Directors, Management and Employees perform with team spirit guided by clear rules of work discipline.
 - e. **Extra-Mile**
The Directors, Management and Employees expected to contribute to stakeholders' growth by "Going Extra-Mile" in business activities and development of the Company.

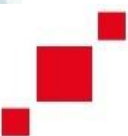
- 3.2 This COBE is not an exhaustive document and does not address every possible situation. You are obliged to familiarise yourself with and adhere to all applicable policies, procedures, laws and regulations of the countries in which the Group operates.
- 3.3 When there is a conflict between the provisions of this COBE and laws and regulations provisions, the laws and regulations shall apply.
- 3.4 The provision of this COBE may be amended or waived by KPS Berhad from time-to-time at its sole discretion. The waiver would only be granted in exceptional circumstances and then only keeping with applicable law and KPS Berhad's policies and procedures.
- 3.5 Above all else, you must exercise sound judgement in making the right decisions.

4.0 RESPONSIBILITY AND COMPLIANCE WITH COBE

- 4.1 This COBE applies to all Employees, Management, and Directors. You are also responsible to:
- Promote compliance and good ethical values in consistent with KPS Berhad Core Values; and
 - Provide guidance to others who have raised concerns or questions regarding COBE.
- 4.2 As Counterparties, you are also required to understand and comply with the relevant aspects of the COBE. Business Partners are encouraged to adopt similar principles and standards of behaviour.



WORK ENVIRONMENT AND HUMAN RIGHTS



5.0 WORK ENVIRONMENT & HUMAN RIGHTS

The Group respects everyone as individuals and treats them with dignity. The Group embraces individual differences in a spirit of inclusiveness that welcomes all people and seeks to provide them with the opportunity to unleash their potential. By treating each other with respect, dignity, courtesy and fairness, the Group can continue to succeed through effective teamwork and collaboration.

KPS Berhad is committed in remediating human rights abuses by ensuring timely, transparent, and effective grievance mechanisms are continuously established and implemented.

5.1 Equal Opportunity and Non-Discrimination

5.1.1 The Group provides equal opportunities to all and endeavours to ensure that employment-related decisions are based on relevant qualifications, merit, performance and other job-related factors and in compliance with all applicable laws and regulations.

5.1.2 Any discrimination based on gender, race, disability, nationality, religion, age or sexual orientation are prohibited unless specific laws or regulations expressly provide for selection according to specific criteria.

5.2 Harassment and Violence

Any types of harassment and violence will not be tolerated. These actions or behaviours include derogatory comments based on gender, racial or ethnic characteristics, and unwelcomed sexual advances, spreading of malicious rumours or use of emails, voicemail and other forms of communication channels to transmit derogatory or discriminatory material. All Employees of the Group are required to comply with all anti-harassment laws in the locations where they work.

5.3 Illegal Substances

The Group strictly prohibits the use or transfer of illegal drugs or other illegal substances in the workplace.

5.4 Criminal Activities

You must not engage or become involved in any behaviour or activities that may be categorised as subversive or commit any wrongdoing, criminal or otherwise that is punishable under the laws of any country. If you are found guilty by a court of law or found to be involved in subversive activities or commit a criminal offence, you will be dealt with in accordance with the Group's relevant policies and procedures.

5.5 Environment

The Group is also responsible in ensuring compliance with applicable laws, contractual regulations and all applicable requirements in order to prevent any workplace accidents in violation of rules on the protection of health and safety at work by eliminating hazards and reduce quality, safety, health and environment risks.

5.6 **Occupational Safety and Health**

- 5.6.1 The Group strives to remove or reduce the risks to health, provide safety and welfare of all Employees, contractors/ suppliers and visitors and anyone else who may be affected by our business operations and ensure all work or activities are done safely.
- 5.6.2 The Group has a comprehensive emergency plan and conducts regular drills to minimise harm to life, the environment, and property. Emergency plans shall include fire detection and suppression equipment, clear egress, and adequate exit facilities.

5.7 **Forced Labour & Child Labour**

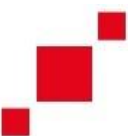
- 5.7.1 The Group strictly prohibits any form of forced labour, including bonded labour, involuntary prison labour, slavery, and human trafficking. All work must be voluntary, and workers must be free to leave work or terminate their employment without penalty, provided a reasonable notice is given.
- 5.7.2 The Group is committed to ensuring that no child labour is used in any stage of manufacturing. Workers under the age of 18 shall not perform work that jeopardises their health or safety, including night shifts and overtime. We will implement robust mechanisms to verify the age of workers and ensure proper management of student workers.

5.8 **Working Conditions**

The Group respects the rights of our Employees, our workers in our operations and our communities through our commitments by ensuring decent living and working conditions for all our Employees. We strive to provide a fair wage and access to basic needs for all our Employees and workers in our operations.

5.9 **Personal Data Protection**

- 5.9.1 The Group respects the privacy and confidentiality of its Employees, Directors, Counterparties, Business Partners and Customers' personal data. Personal data should be kept private and protected, unless access is granted for legitimate business purposes or disclosure of which is required by law.
- 5.9.2 If you have access to such data, you are required to comply with the applicable laws, such as Personal Data Protection Act, and also the Group's policies. Appropriate measures must be taken if you are dealing with personal data in terms of collection, processing, disclosure, security, storage and retention.
- 5.9.3 As and when is required by law, the Group may mandate the appointment of a Data Protection Officer (DPO) to oversee data protection strategies and ensure compliance.
- 5.9.4 In the event of a data breach, timely notification must be provided to the relevant authorities and affected data users as per the PDPA requirements.



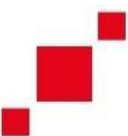
5.10 **Cybersecurity**

5.10.1 The Group is committed to protecting its digital infrastructure and data against cyber threats.

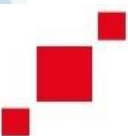
5.10.2 As and when necessary, Employees will undergo regular training on cybersecurity practices and protocols to stay updated with the latest threats and preventive measures.

Useful References

- Employee Handbook (Employee Code of Conduct)
- Information Technology Policy
- Quality, Safety, Health & Environment Policy
- Personal Data Protection Policy
- Anti-Harassment Policy
- Sustainability Policy



DEALING WITH CONFLICTS OF INTEREST



6. DEALING WITH CONFLICTS OF INTERESTS

All Directors and Employees are expected to make business decisions in the best interests of the Group.

6.1 General Guidance

- 6.1.1 A conflict of interest arises when you have a personal interest that could be seen to have the potential to interfere with your objectivity in performing duties or exercising judgement on behalf of the Group. You should avoid conflicts of interests.
- 6.1.2 You must not use your position, official working hours, Group's resources and assets for personal gain or for the advantage of those you are associated with.
- 6.1.3 If you find yourself in a situation of conflict whether actual or potential, speak to your head of department and/or your reporting manager so that it could be managed properly. Such situation must be reported in writing as soon as practicable stating the facts, nature and extent of the conflict.
 - a. Report to your respective head of subsidiary, if you are an Employee at a KPS Berhad's subsidiary.
 - b. Report to your head of department if you are an Employee of KPS Berhad.

6.2 Reporting a Conflict of Interest

- 6.2.1 All Employees, Management and Directors are required to sign and submit the Disclosure on Conflict-of-Interest Form on an annual basis, or as and when required by the Group.
- 6.2.2 Any Employee who is in a situation of actual or potential conflict must complete the Disclosure on Conflict-of-Interest Form as soon as the situation arises. The completed Disclosure on Conflict-of-Interest Form shall be submitted to the respective head of department for approval. The head of department shall consult with the relevant party as prescribed in the form to facilitate deliberation, depending on the nature of the conflict. If you are uncertain on any matter relating to the disclosure, you can seek advice from the Human Resource Development Department or LCD.
- 6.2.3 The respective head of department upon discussion and consultation with the Human Resource Department and LCD, shall then take such action as is considered necessary to safeguard the interests of the Group and/ or provide dispensation under allowable circumstances. Where the conflict involves an award of contract or proposed contract with the Group, the terms of the contract must be deliberated and decided independently e.g. through an independent tender committee if the approval is via a tender committee. You are also to refrain from participating in any of the tender process.
- 6.2.4 Director must disclose the nature and extent of any conflict of interests to the respective board of Directors, and if required, the prior approval of the respective board of Directors / shareholders must be sought, in accordance with applicable laws, regulations and in accordance with 's Group's Directors' Conflict of Interest Policy.



6.3 **Dealings with Suppliers, Customers, Agents and Competitors**

6.3.1 Any Director or Employee or their family members must not have:

- a. any financial interest in a supplier, customer, agent or competitor of the Group, except that in the case of a public listed company whereby an interest of less than 10% in the equity will be disregarded; and
- b. any business dealings or contractual arrangements with the Group. This excludes staff purchases for personal consumption or purchases which are on no more favourable terms than those offered to the public.

6.3.2 In the case of payments by the Group to officially appointed selling agents, the buyer (i.e. Employee and/or Management) should have knowledge of the normal commercial practice that commission is payable to the agents, and consequently specific approval from the buyer is not required.

6.3.3 With the exception of the above instances, Employees are prohibited from receiving commissions from Counterparties, Business Partners, Suppliers competitors, any third party dealing with the Group.

6.4 **Outside Employment and Activities Outside the Group**

6.4.1 As a full-time Employee, you must not take up employment outside the Group or engage in any outside business/ service which may be in competition with the Group or give rise to actual or perceived or potential conflict of interests with your duties in the Group.

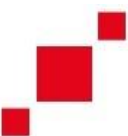
6.4.2 Unless written approval is obtained as per item 6.2, you are not allowed to be a member of the government, quasi-government or statutory bodies or become office bearers, council member, or committee member of trade association. This restriction does not apply to social or community-related clubs and associations.

6.5 **Family Members and Close Personal Relationships**

6.5.1 A Director or Employee of the Group should not hire, recommend hiring, exert influence over hiring decisions, supervise, affect terms and conditions of employment or influence the management of any family members engaged by the Group. Family members of Directors or Employees may be hired as Employees or consultants only if the appointment is based on qualification, performance, skills and experience, and in accordance with the Group's hiring policies and procedures.

6.5.2 A Director or an Employee must also disclose business activities in the Group which involve family members and refrain from any related decision-making process.

6.5.3 Any substantial interest held by the Director's or Employee's family members in a competing company must be declared.

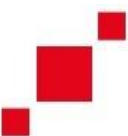


6.5 Investment Activities

Personal investment decisions made by a Director or an Employee must not influence his/ her independent judgement on behalf of KPS Berhad Group.

Useful References

- KPS's Board Charter
- Code of Conduct for Directors
- Directors' Conflict of Interest Policy
- Anti-Bribery & Corruption Policy
- Employees' Conflict of Interest Policy
- Related Party Transactions Policy
- Entertainment & Gift Policy
- Employee Handbook (Employee Code of Conduct)

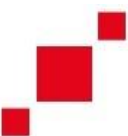


ANTI- BRIBERY AND CORRUPTION



7.0 ANTI-BRIBERY AND CORRUPTION

- 7.1 KPS Berhad Group takes a zero-tolerance approach towards bribery and corruption, and is committed to behaving professionally, fairly and with integrity in all our business dealings and relationships wherever the
- 7.2 The Group operates, implements and enforces effective systems to counter bribery and corruption. This commitment is underpinned by our dedication to fostering a culture of integrity throughout our organisation.
- 7.3 The Group intends to fulfil the requirements set forth in the Guidelines on Adequate Procedures issued on 10 December 2018 by the Prime Minister's Office pursuant to subsection (5) of section 17A of the Malaysian Anti-Corruption Commission Act 2009 (Act 694) (MACC Act 2009).
- 7.4 You must strictly adhere to all applicable anti-bribery and corruption laws and regulations and treaties in all countries in which the Group operates. You must also comply with the Company's Anti-Bribery and Corruption Policy.
- 7.5 You must not directly or indirectly engage in any corrupt conduct, which include but not limited to the abuse of position/ authority and falsification of documents.
- 7.6 You must not influence others or be influenced, either directly or indirectly, by paying or receiving bribes or kickbacks or any other measures that are deemed unethical or will tarnish the Group's reputation.
- 7.7 You must not accept a benefit from or provide a benefit to a third party by reason only of him/her being a director or employee or him/her doing something or refraining from doing anything as a director or employee unless he is permitted to do so by the Company's / relevant subsidiary's constitution, and it is not contrary to any written law. Any benefit must be recorded and approved according to the Company's / relevant subsidiary's policies.
- 7.8 You will not suffer demotion, penalty or other adverse consequences for refusing to pay or receive bribes even if such refusal may result in the Group and/ or the Company losing its business or not meeting its targets.
- 7.9 All Counterparties (when representing the Group) are under a duty not to promise, offer or give any improper advantage on behalf of the Group. Directors and Employees must endeavour to ensure that these Counterparties do not promise, offer or give any such improper advantage on behalf of the Group.
- 7.10 The Group will undertake a bribery and corruption risk assessment across the Group to understand the risks it faces and ensure that it has adequate procedures in place to address those risks.
- 7.11 The Group will implement appropriate controls and contingency measures to address any corruption risks arising from weaknesses in the governance framework, processes, and procedures.
- 7.12 The Group will conduct training and awareness programmes for all Directors and Employees across the Group regarding anti-bribery, integrity, and ethics on a regular basis.



7.13 **Supplier Integrity Pledge**

7.13.1 KPS Berhad requires all of the Suppliers to adhere to the highest standards of integrity and ethical behaviour.

7.13.2 All Suppliers shall execute the Group's Supplier/Vendor Integrity Pledge prior or when submitting its tender/bid/proposal in any procurement process, or as and when is required by the Group.

7.13.3 The Suppliers must commit to the following principles:

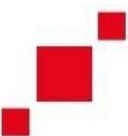
- a. Compliance with all applicable laws and regulations, including anti-bribery, anti-corruption, and anti-fraud laws, protection of personal policy (including personal data), human rights, anti-money laundering, and occupational health, safety and environment;
- b. Promotion of values such as integrity, transparency, accountability, and good corporate governance;
- c. Strengthening internal systems to support corruption prevention and ethical practices;
- d. Committed to responsible business conduct, integrating Environmental, Social, and Governance (ESG) considerations to drive sustainable development efforts;
- e. Reporting any actual or suspected breaches of ethical standards to KPS Berhad as soon as reasonably practicable;
- f. Ensure that their subsidiaries, affiliates, and all other parties they appoint to conduct work for KPS Berhad also comply with these principles; and
- g. In the event of any breach of these principles, the Group reserves the right to revoke the contract award or terminate the contract without any liability.

7.14 **Employee Integrity Pledge**

7.14.1 All employees of KPS Berhad Group are required to commit to the highest standards of integrity and ethical behaviour. Employees must pledge to:

- a. Act with honesty, integrity, and transparency in all professional dealings;
- b. Comply with all applicable laws, regulations, and company policies;
- c. Avoid conflicts of interest and disclose any potential conflicts to the appropriate authority; and
- d. Report any actual or suspected unethical behaviour or violations of the COBE to the designated compliance officer or through the Whistleblowing Channel.

7.14.2 Employees must understand that any violation of this pledge may result in disciplinary action, up to and including termination of employment.



7.14.3 The Group will provide regular training and resources to support employees in understanding and adhering to these ethical standards.

7.15 **Facilitation Payments**

7.15.1 KPS Berhad prohibits accepting or obtaining, either directly or indirectly, facilitation payments from any person for the benefit of the Directors and Employees themselves or for any other person. Facilitation payments are seen as a form of bribery and corruption.

7.15.2 Facilitation payments are payments made to secure or expedite the performance by a person performing a routine or administrative duty or function. Offering, promising, or requesting facilitation payments is just as prohibited as actually paying or receiving facilitation payments. Facilitation payments do not need to involve cash or other financial assets; they can be any sort of advantage with the intention to influence the performance of duties.

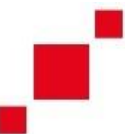
7.16 The Employees, Management and Directors may submit reports on anti-bribery and corruption via the Whistleblowing Channel as per KPS Berhad's Whistleblowing Policy and Guidelines.

Useful References

- Anti-Bribery & Corruption Policy
- Entertainment and Gift Policy
- Employee Handbook (Employee Code of Conduct)
- Supplier Integrity Pledge
- Whistleblowing Policy & Guidelines



GIFTS, ENTERTAINMENT AND TRAVEL



8.0 GIFTS, ENTERTAINMENT AND TRAVEL

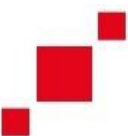
- 8.1 KPS Berhad Group prohibits the use of improper gifts, entertainment and travel to influence business decisions. You must comply with all applicable policies, procedures, laws and regulations related to the use of gifts, entertainment and travel in all countries in which the Group operates.
- 8.2 It is acknowledged that the practice of business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. Gifts of more than nominal value, frequent gifts or entertainment, or entertainment that is more than a routine social amenity can appear to be an attempt to influence you or the other party. The intention behind the gift should always be considered, so that it does not create an appearance of bad faith and impropriety and should not be misunderstood by others to be a bribe.

8.3 Gifts

- 8.3.1 You or your family members must not solicit any gifts from Counterparties or Business Partners directly or indirectly. You or your family members are also discouraged from accepting gifts from these parties. Occasional acceptance of gifts is allowed to promote good business relationships.
- 8.3.2 Similarly, you may offer gifts to promote good business relationships. However, you must be sensitive to the recipient organisation's gifts receiving policy.
- 8.3.3 You or your family members may accept or offer the gifts subject to the criteria and approvals set out in the Group's established procedures.
- 8.3.4 You must never accept or offer, with or without approval, gifts in the form of cash or cash equivalents, personal services or those otherwise that may put yourself in a position of conflict, influence your business decision or was otherwise intended or given with the expectation of gaining any advantage, or which may adversely affect the Group's reputation.

8.4 Entertainment

- 8.4.1 You and your family members must not solicit any form of entertainment from Counterparties or Business Partners directly or indirectly. You may accept invitations to social events or entertainment within reason according to the scope of your work provided these events or entertainment are not lavish or become a regular feature that may influence business decision making process.
- 8.4.2 You may also offer modest entertainment that is legal and reasonable within the scope of your work. When offering entertainment, you must be sensitive to the recipient organisation's entertainment receiving policy. You must consult and obtain prior approval from the MD/GCEO or his/her head of subsidiary (as applicable). As for Director, you must consult the Chairman of the respective board of Directors.
- 8.4.3 You must not accept, engage or offer any entertainment that is indecent, sexually oriented or that otherwise might put yourself in a position of conflict or adversely affect the Group's reputation.



8.5 Travel

You may accept lodging and other expenses (e.g. food, transportation) provided by Counterparties, Business Partners or other stakeholders within the host country if the trip is for business purposes and prior approval in accordance with established procedures has been obtained. The cost of travelling to the host country must be borne by the Company.

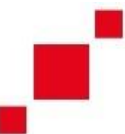
Unless prohibited by law or the policy of the recipient organisation, KPS Berhad Group may bear the costs of transportation and lodging for Counterparties, Business Partners or other stakeholders in connection with a visit to the Group's facility. The visit must be for a legitimate business purpose e.g. on-site examination of equipment, contract negotiations or training. Prior approval in accordance with established procedures must be obtained.

Useful References

- Code of Conduct for Directors
- Directors' Conflict of Interest Policy
- Employees' Conflict of Interest Policy
- Anti-Bribery & Corruption Policy
- Entertainment and Gift Policy
- Employee Handbook (Employee Code of Conduct)



DONATIONS AND SPONSORSHIPS

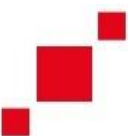


9.0 DONATIONS AND SPONSORSHIPS

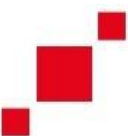
- 9.1 All sponsorships and donations shall not be used as a subterfuge for bribery. KPS Berhad needs to be certain that donations to charities or beneficiaries are not disguised illegal payments to government officials and must ensure that the charity does not act as a conduit to fund illegal activities in violation of anti-money laundering, anti- terrorism and other applicable laws.
- 9.2 In accordance with KPS's commitment to contribute to the community coupled with its values of integrity and transparency, all sponsorships and donations must comply with the following:
- ensure such contributions are allowed by applicable laws;
 - obtain all the necessary internal authorisations;
 - be made to well established entities having an adequate organisational structure to guarantee proper administration of the funds;
 - be accurately stated in KPS's accounting books and records; and
 - not to be used as a means to cover up an undue payment or bribery;.
- 9.3 You should also avoid situations where conflicts of interests could arise from making donations or sponsorships.
- 9.4 The giving of charitable donations or the payment of expenses for, or on behalf of, public officials or a public entity is governed by a complicated array of regulations, which vary from jurisdiction to jurisdiction. Before making any expenditure for, or on behalf of, public officials or public entity you must consult LCD/IGU for consultation prior to getting necessary approval. Donations and sponsorships should be made transparently and recorded.

Useful References

- Code of Conduct for Directors
- Directors' Conflict of Interest Policy
- Employees' Conflict of Interest Policy
- Anti-Bribery & Corruption Policy
- Entertainment and Gift Policy
- Employee Handbook (Employee Code of Conduct)



PROTECTING KPS BERHAD GROUP AND SHAREHOLDERS



10.0 PROTECTING THE GROUP AND SHAREHOLDERS

KPS Berhad Group is committed to protecting its assets and resources.

10.1 Protecting Group Assets

The Group entrusts you with the Group's assets in the performance of your job. You must protect these assets against waste, loss, damage, abuse, misuse, theft, misappropriation or infringement of Intellectual Property rights and ensure these assets are used responsibly.

10.2 Accuracy of Financial Information

10.2.1 The Group is committed to ensuring the integrity of financial information for the benefit of stakeholders, including but not limited to the board of Directors, Management, shareholders, creditors and government agencies.

10.2.2 As the Group relies on accounting records to produce reports, you must ensure that all business records and documents are prepared accurately, reliably and in a timely manner.

10.2.3 These records must conform to generally accepted accounting principles as well as to all applicable laws and regulations of the jurisdiction in which the Group operates.

10.2.4 Such records are important to the Group's decision-making processes and the proper discharge of its financial, legal and reporting obligations.

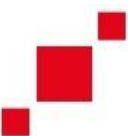
10.2.5 Falsification of financial or any other records or misrepresentation of information may constitute fraud and can result in civil and criminal liabilities for Directors, Employees and the Group. You are obliged to report false entries or omissions and to highlight questionable or improper accounting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

10.3 Proprietary and Confidential Information

10.3.1 The Group values and protects all proprietary and Confidential Information.

10.3.2 In the course of your service, you may come into possession of confidential, sensitive and public information relating to the Company and or its business associates. It includes but is not limited to, non-public information that might be useful to competitor or harmful to the Group or its customers if disclosed such as:

- a. Non-public information about the Group's financial condition, prospects or plan as well as information relating to mergers and/or acquisitions and divestments;
- b. Non-public information concerning possible transactions with other companies or information about KPS' joint venture partners that the Group is under an obligation to maintain as confidential; and



- c. Non-public information about discussion and deliberations relating to business issues and decisions between and among Employees, officers and Directors.

10.3.3 You are prohibited from disclosing any Confidential Information either during or after your service with the Group, except when disclosures is required by any order of any court of competent jurisdiction or any competent judicial, governmental or regulatory authority, as the case maybe. It is therefore pertinent that you exercise caution and due care in handling any information obtained in the course of your duties.

10.3.4 You must be aware that any unlawful or unauthorised disclosure of proprietary or Confidential Information may result in irreparable loss and/ or damage to the Group. In such cases, the Group may institute civil and criminal proceedings against the offending party.

10.3.5 It is equally important that any proprietary or Confidential Information is disclosed to Employees on a need-to-know basis only.

10.4 **Insider Information, Securities Trading and Public Disclosure**

10.4.1 As a public listed company, the Group 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.

10.4.2 You are prohibited from engaging in insider trading. You are required to comply with applicable laws and regulations on insider trading, including restriction in dealing with securities of KPS Berhad the Group while in the possession of material non-public information or price sensitive information.

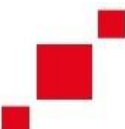
10.4.3 You or other representatives of the Group are not allowed to trade in securities or other financial instruments based on knowledge that is obtained in the performance of duties, if that information has not been reported publicly.

10.4.4 Disclosure of material, non-public information to others can result in civil and criminal penalties.

10.5 **Information Technology**

10.5.1 All computer facilities must be safeguarded against theft, damage and improper usage. The Group does not permit the usage of computer facilities involving sensitive and illegal matters, infringement of Intellectual Property rights, unauthorised access, misuse of the company's time and resources and risking the integrity of computer facilities.

10.5.2 To the extent allowed by applicable laws in the countries in which it operates, the Group reserves the right to monitor your email messages, instant messaging, blogs, use of the internet and contents in Group issued computer facilities. This information can be recovered and used as evidence in domestic proceedings and courts of law or disclosed to the authorities or regulatory bodies as the case may be.



10.6 You must use the Group's computer facilities responsibly and primarily for the business purposes for which they are intended. The computer facilities include access to the Internet, email services and all other computer hardware, software and peripherals.

10.7 **Records Management**

10.7.1 You must cause to be kept the accounting records and other records:

- a. to sufficiently explain the business, transactions and financial position of the Company;
- b. to enable the preparation of true and fair financial statements;
- c. to enable the accounting and other records of the Company to be conveniently and properly audited; and
- d. retain all records referred to above for not less than seven (7) years from the completion of the transactions or operations to which the entries or records relate in compliance with legal, tax, accounting and regulatory laws.

10.7.2 You must also ensure that all Company books, records and accounts shall be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record.

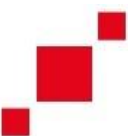
10.8 **Business Communication**

10.8.1 You are not authorised to make any public statements either oral or written in any other form, about the Group to any media (electronic and/or print) and/or the internet without prior approval of the Chairman, Managing Director/Group Chief Executive Officer or such other designated personnel or authorised persons of the Group.

10.8.2 Authorised person must ensure that all business communication is clear, truthful and accurate. You must avoid misleading information, speculative opinions or derogatory remarks. This applies to communications of all kinds, including e-mail and informal notes or memos.

10.9 **Social Media**

10.9.1 Every Employee has the responsibility to protect the Group's reputation and brand image. When using your private social media accounts you must ensure that your posts reflect only your personal opinions and does not negatively affect public perception of the Group. You should also take extra precaution so as to not share any confidential and proprietary business information.



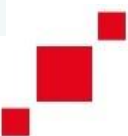
10.9.2 Employees and Counterparties who are tasked to manage the Company's official social media accounts are also responsible in ensuring that the management of the accounts and activities are in accordance with the Company's Information Technology Policy.

Useful References

- Code of Conduct for Directors
- Anti-Bribery and Corruption Policy
- Directors' Conflict of Interest Policy
- Employees' Conflict of Interest Policy Information Technology Policy
- Employee Handbook (Employee Code of Conduct)
- Records Management SOPs



DEALING WITH COUNTERPARTIES AND BUSINESS PARTNERS



11.0 DEALING WITH COUNTERPARTIES AND BUSINESS PARTNERS

- 11.1 The Group strives to build and strengthen its relationships with Counterparties and Business Partners.
- 11.2 Directors and Employees are expected to conduct business ethically and share the business ethics and principles prescribed in the COBE with their Counterparties and Business Partners.
- 11.3 Business dealings shall be impartial, objective and free from any influence, either within or outside the Group. In this respect, Directors and Employees must avoid any business dealings with those who are likely to harm the Group's reputation and who violate laws and regulations e.g. safety, environmental, anti-bribery or anti-trust laws.

11.4 Counterparties

- 11.4.1 The Group selects its Counterparties impartially and based on merit with considerations to, among others, price, quality, service, integrity and ethical standards.
 - a. You must ensure that all procurement decisions are made solely in the Group's best interests and in compliance with the Group Procurement policies and procedures.
 - b. Payments made shall commensurate with the services or products provided.
- 11.4.2 It is important to be aware that an offer/ payment to a company rather than an individual is not an automatic safeguard; the same tests must be strictly applied.
- 11.4.3 The Group seeks to do business with those who comply with all applicable legal requirements and act consistently with this COBE.

11.5 Customers (Business Partner)

- 11.5.1 You must always treat customers with honesty and respect. You must provide them with accurate and truthful information about products and services. You must also endeavour to enhance the quality and reliability of products and services via continuous process improvement and innovation.
- 11.5.2 Deliberate misleading messages, omission of important facts, or false claims about the Group's or its competitors' offerings are prohibited.

11.6 Joint Ventures and Business Alliances (Business Partner)

The Group endeavours to work or associate with companies that share the Group's values and ethics and the principles of the COBE. We aspire to assist our joint ventures in adopting, as far as practical, the key principles laid out in our COBE.



11.7 Competition and Anti-Trust Laws

11.7.1 The Group is committed to competing ethically in the marketplace. You are required to comply with competition and anti-trust laws in the countries in which the Group operates. You must be aware that infringement of such laws can result in civil and criminal liability for both you and the Group.

11.7.2 In addition, you must not use illegal or unethical methods to compete in the market. This includes, without limitation:

- a. Exchanging competitive information with competitors;
- b. Fixing prices or terms related to pricing;
- c. Dividing up markets, territories or customers;
- d. Rigging a competitive bidding process (including arrangement to submit sham bids); and
- e. Adopting strategies to illegally exclude competitors from the market, such as, without limitation anti-competitive bundling or predatory pricing.

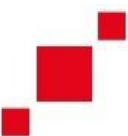
11.7.3 You must not misappropriate proprietary information or possess trade secrets obtained without the owner's consent or by pressuring disclosures from Employees of other companies.

11.8 International Trade Laws

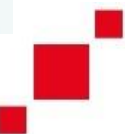
As a multinational company conducting business across the globe, the Group is subjected to laws and regulations that govern international trade. Employees and Counterparties whose line of work are impacted by these laws, are required to familiarise and comply with such applicable laws and regulations particularly in relation to (but not limited to) import and export controls, such as trade barriers and import duties.

Useful References

- Code of Conduct for Directors
- Anti-Bribery and Corruption Policy
- Procurement Policy
- Limits of Authority Table / Financial Authority Limit



DEALING WITH GOVERNMENT AUTHORITIES, POLITICAL PARTIES AND INTERNATIONAL ORGANISATIONS



12.0 DEALING WITH GOVERNMENT AUTHORITIES, POLITICAL PARTIES AND INTERNATIONAL ORGANISATIONS

The Group strives to build transparent and fair relationships with government agencies, public officials and international organisations. Appropriate action must be taken to comply with the applicable laws and regulations in all countries in which the Group operates, as well as the Group's relevant policies and procedures.

12.1 Dealing with Regulators and Government Agencies

Your department or operating unit may be subjected to formal or informal queries, surprise inspections, investigations or raids by regulators and government agencies. In any of these events, Employees are expected to recognise the proper procedures in engaging with our stakeholders, including the notification and necessary approval requirement, where applicable.

12.2 Political Activities

12.2.1 You have the right to participate as individuals in the political process. Your participation shall be carried out entirely on your own accord, by your own volition, in your own time and with your own resources. Your political opinions must be clearly delivered as personal opinions and not representative of the Group's position.

12.2.2 Any Employee who wishes to hold any key position as office bearer in any political party must disclose and obtain prior approval from the MD/GCEO or his/her head of subsidiary (as applicable). Those who wish to actively participate full time in politics or are nominated as candidates in any election or are elected as representatives in the Federal or State Legislative Body must resign from KPS Berhad Group.

12.2.3 Any Director who wishes to hold any key position as office bearer in any political party must disclose such intention to the board Chairman.

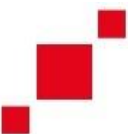
12.3 Political Contributions

12.3.1 The Group does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office. Examples of prohibited political donations include but not limited to:

- a. cash contributions;
- b. free or discounted use of the Group's premises, equipment or other company resources; and
- c. payment of salary of the Group's Employee working for a political party or candidate working during normal working hours (except if the Employee in question takes a legally permissible paid leave).

12.3.2 Furthermore, charitable donations shall not be used as a subterfuge for prohibited political payments.

12.3.3 If you wish to contribute your own time or money to any political activity, it shall be deemed as an entirely personal and voluntary decision.

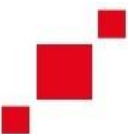


12.4 **Anti-Money Laundering and Anti-Terrorism Financing**

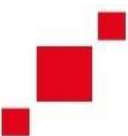
- 12.4.1 The Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 ("**AMLA**") is the primary statute governing the AML/CFT regime in Malaysia. The Act was gazetted as law on 5 July 2001 and came into force on 15 January 2002.
- 12.4.2 The AMLA provides for the offence of money laundering and terrorism financing and the measures to be undertaken for the prevention of money laundering and terrorism financing offence.
- 12.4.3 The Group strongly opposes practices related to money laundering, including dealing in the proceeds of criminal activities as money laundering is a serious crime, and the laws governing it can have extraterritorial effects.
- 12.4.4 You are prohibited from supporting or facilitating money laundering or terrorist financing. You must take reasonable care to not tip off persons suspected of money laundering and must be aware and follow strictly abide the AMLA.
- 12.4.5 You should be always vigilant and critically analyse customers and transactions, timely raise concerns and report suspicions relating to money laundering and terrorist financing in line with the reporting process implemented in KPS Berhad Group.
- 12.4.6 You are prohibited from money laundering activities, either directly or indirectly. The activities may include, but not limited to the following:
- a. Payments made in currencies that differ from invoices;
 - b. Attempts to make payment in cash or cash equivalent (out of normal business practice);
 - c. Payments made by third parties that are not parties to the contract; and
 - d. Payments to or accounts of third parties that are not parties to the contract.

Useful References

- Anti-Bribery and Corruption Policy
- Directors Code of Conduct
- Employee Handbook (Employee Code of Conduct)



MANAGEMENT OF COBE



13.0 MANAGEMENT OF COBE

13.1. Guidance

You can seek advice from the IGU or LCD if you are uncertain as to the interpretation or application of this COBE.

13.2. Raising a Concern or Reporting a Violation

13.2.1 Each of us has a responsibility to ensure that any instance of actual or suspected violation of COBE is reported promptly.

13.2.2 KPS Berhad Group practises an open-door policy and encourages you to share your questions, concerns or suggestions with someone who can address them properly. In most cases, your immediate superior is in the best position to address any concerns.

13.2.3 Please refer to the Whistleblowing Policy and Guidelines for options to raising a concern.

13.2.4 When you raise a concern or report a violation, your identity will be kept confidential. However, your consent will be sought should there be a need to disclose your identity for investigation purposes. Please take note that the investigation may be impacted if you do not provide your consent or if you choose to remain anonymous.

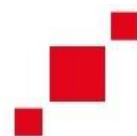
13.2.5 The Group expects all parties to act in good faith and have reasonable grounds when reporting a concern or issue. If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including legal action or termination of service, where applicable.

13.3. No Retaliation

13.3.1. The Group does not tolerate retaliation against individual who discloses any actual or suspected violations in good faith. You will not suffer harassment, retaliation or adverse employment consequence for speaking up or cooperating in an investigation. A Director or an Employee who retaliates against others (including Counterparties and Business Partners) who make a report in good faith will be subject to disciplinary action up to and including termination of employment or dismissal.

Useful References

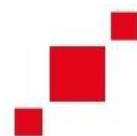
- [Whistleblowing Policy and Guidelines](#)
- Whistleblowing Standard Operating Procedure
- <https://www.kps.com.my/index.php/whistleblowing>



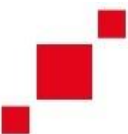
DEFINITIONS

The definitions of the key terms used in this COBE are as follows:

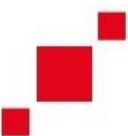
TERMS	DESCRIPTIONS
Anti-trust Laws	Laws intended to promote free competition in the marketplace by outlawing monopolies.
Assets	<p>Tangible or intangible resources controlled by the enterprise as a result of past transactions or events and from which future economic benefits are expected to flow to the enterprise.</p> <p>Such resources shall include buildings, sites, equipment, tools, supplies, communication facilities, funds, accounts, computer programmes, information, technology, documents, patents, trademarks, copyrights, know-how and other resources or property of the Group.</p>
Bribery	<p>Any action which would be considered as an offence of giving or receiving 'gratification' under the Malaysian Anti-Corruption Commission Act 2009 (MACCA 2009). In practice, this means offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person who is in a position of trust within an organisation.</p> <p>Bribery may be 'outbound', where someone acting on behalf of the Group attempts to influence the actions of someone external, such as a government official or client decision-maker. It may also be 'inbound', where an external party is attempting to influence someone within the Company such as a senior decision-maker or someone with access to Confidential Information.</p>
Business Partner	Any party with which the Group has a commercial relationship with but is not in a position to exercise a significant or controlling influence over, such as customers, Joint Ventures (non-controlling interest) and business alliances.
Cash Equivalent	An asset, such as property or stock, that has a realisable cash value equivalent to a specific sum of money, or an asset that is easily convertible to cash, for example, a Treasury bill.
Code of Business Conducts and Ethics (COBE)	A set of guidance aimed at governing the business conduct of Directors, Employees and Counterparties.
Competitors	Competitors are persons or entities that render the same or very similar services or supply the same or similar products as the Group in any one or a number of business environments.



TERMS	DESCRIPTIONS
Confidential Information	<p>a. Any information in any form whatsoever not generally known, and propriety to the Group including but not limited to information relating to their processes, operations, trade, products, research, development, manufacture, purchasing, business, business prospects, transactions, affairs, activities, know-how, Intellectual Property, accounting, finance, planning, operations, customers data, engineering, marketing, merchandising and selling, proprietary trade information, payroll figures, personal data of Employees, customers' list, records, agreements and information, technical and other related information, and any books, accounts and records kept by the Group for the purpose of its business;</p> <p>b. All information disclosed to a Director or an Employee or to which the Director or Employee obtains access during his/ her tenure which he/ she has reason or ought to have reason to believe to be Confidential Information, shall be presumed to be Confidential Information and shall include (but shall not be limited to) price lists, business methods, customer history, records, information and inventions; and</p> <p>c. Any such information as described in (a) and (b) above which relate to any of the Group's suppliers, agents, distributors and customers.</p>
Conflict of Interest Disclosure Form	A document used by KPS Berhad Group to identify and manage potential conflicts of interest among its Employees, Management, or the Directors, inline with the Conflict of Interest Policy (Employee) issued by KPS Berhad's Human Resource Department; and the Directors' Conflict of Interest Policy issued by KPS Berhad's Secretarial Department.
Contract	An agreement that legally obliges a party to do, or not to do, a certain thing. Examples of contracts include sales and purchase contracts, service contracts and others.
Counterparties	Joint Ventures (controlling interest), Consultants, agents, contractors and goods/ service providers of the Group who have direct dealings with the Group.
Customers	Customers are persons or entities to which the Group provides products or render services to and includes potential customers.
Director(s)	Directors include all independent and non-independent Directors, executive and non-executive Directors of the Group and shall also include alternate or substitute Directors.



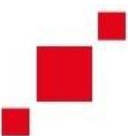
TERMS	DESCRIPTIONS
Employee(s)	Employees shall encompass all personnel including senior Management, managers, executives and non-executives under the employment of the Group. This also covers temporary staff and interns.
Donation	An especially charitable gift, contribution, subscription, present, hand out, grant, offering, gratuity, endowment or other similar donation that can be perceived by a third party, to be for the purpose of bribery even if neither the giver nor the receiver intended it to be for this purpose. It can include giving or providing cash, venues, equipment, personnel time or other benefit.
Ethics	Standards of conduct, which indicate how to behave, based on moral duties and virtues arising from principles of right and wrong. Ethics involve two aspects namely the ability to distinguish right from wrong and the commitment to do what is right.
Family Members	Include the Director's or Employee's spouse, parent, child (including adopted child and stepchild), brother, sister and the spouse of his/her child, brother or sister or any other person as stipulated in interpretation of Section 3 of MACC Act.
Fraud	A false representation of a matter of fact, whether by words or by conduct, by false or misleading allegation, or by concealment of what should have been disclosed, that deceive or is intended to deceive another person.
Government Officials	Government Officials are defined broadly to include officers or employees acting on behalf of a government or public body or agency. It could also refer to officers or employees of a government international organisation, such as the United Nations. It also includes political officials or employees of political parties or candidates for political office.
Gift	Money, movable or immovable property, vehicle, shares, travel tickets, entertainment, service, club membership, any form of discounts or commissions, hampers, jewellery, ornament, any gifts, souvenirs, or anything of value which is given to or received by an officer, his or her spouses or any other person on his behalf, without any or insufficient consideration known to the officer.
Harassment	Harassment includes any inappropriate or offensive behavior, whether verbal, non-verbal, physical, or psychological, that is directed at an individual or group based on race, religion, gender, or other attributes, during or outside of work environment. This includes, but is not limited to, sexual harassment.



TERMS	DESCRIPTIONS
IGU	Integrity and Governance Unit of KPS Berhad
Intellectual Property	Proprietary business or technical information of value protected by patent, trademark, copyright, or trade secret laws.
KPS Berhad or the Company	means Kumpulan Perangsang Selangor Berhad In this COBE, the expressions "KPS Berhad Group", "Group" and "KPS Berhad" are used interchangeably to refer to KPS Berhad's Group of companies in general. Similarly, the words "we", "our", "us" and "you" are used to refer to KPS's Group of companies including all of its Directors and Employees. Where applicable, the word "you" is used to refer to the Counterparties and Business Partners.
KPS Berhad Group or the Group	KPS Berhad and its subsidiary companies collectively, as defined in Section 4 of the Companies Act 2016
Political Party	A political group that is officially recognised as being part of the electoral process and who can support (put forth) candidates for elections (free or not) on a regular basis
LCD	Legal and Compliance Department of KPS Berhad
Management	Refers to employee in any of the following positions: <ul style="list-style-type: none"> • Deputy Chief Executive Officers; • Head of departments; • Directors in Grade D1 and D2; and • Head of Subsidiaries
MD/GCEO	Managing Director/ Group Chief Executive Officer of KPS Berhad
Proprietary Information	Proprietary Information is information held by a person or entity concerning the know-how, trade secrets or other information of any kind, whether in printed or electronic format, including but not limited to Intellectual Property rights, technical information, business processes, sales forecasts, marketing strategies, customer lists or potential customer information, financial records or operations which is regarded as being confidential in nature (whether or not labelled as confidential) and belongs to and owned by KPS Berhad Group.
PDPA	Personal Data Protection Act 2010
Retaliation	Action by way of unfair, unlawful or otherwise inappropriate reprisal taken in return of an actual or perceived injury or offence.
Supplier	suppliers, vendors, consultants, agents, contractors and goods/service providers of KPS Berhad Group who have direct dealings with the Group.



TERMS	DESCRIPTIONS
Sexual Harassment	Sexual harassment encompasses unwanted conduct of a sexual nature, including verbal remarks, non-verbal gestures, visual displays, psychological pressure, and physical actions that are offensive, humiliating, or intimidating, whether in or outside of work environment.
Whistleblowing Channel	<ol style="list-style-type: none"> 1. Whistleblowing Hotline at 03-5524 8448; 2. Write a letter/ whistleblowing form to: <i>Chief Integrity and Governance Officer, Integrity and Governance Unit. Kumpulan Perangsang Selangor Berhad, Tingkat 17 Plaza Perangsang, Persiaran Perbandaran, 40000 Shah Alam, Selangor Darul Ehsan</i> 3. Email submission: integrity@kps.com.my or; 4. KPS Berhad's Board Governance and Risk Committee Chairman at chairmanbgrc@kps.com.my.



CONTACT US



Whistleblowing e-Form at:

<https://www.kps.com.my/index.php/whistleblowing>



Emails:

Chairman of Board Governance and Risk Committee:

chairmanbgrc@kps.com.my

Integrity & Governance Unit:

integrity@kps.com.my



Calls to **Hotline** at: +603-5524 8448



Letters to Integrity & Governance Unit:

Integrity & Governance Unit
Legal & Compliance Department
Kumpulan Perangsang Selangor Berhad,
Level 17, Plaza Perangsang
Persiaran Perbandaran
40000 Shah Alam, Malaysia

