

## Cuscapl Berhad Code of Ethics and Business Conduct ('Code')

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### 1. Introduction

Cuscapl Berhad is committed towards observing the highest standards of ethical business conduct and practices in accordance with laws and regulations. The Code guides and preserves the good reputation of the Group, as we endeavour to realise our Vision and Mission.

The Code describes how we practice our Core Values and Principles, based on which, we have set forth specific behavioural rules that are consistent with our policies and practices.

Further details on other policies relating to our Code are provided in the following:

- Employee Handbook
- Corporate Governance Report

### 2. Purpose

Cuscapl Berhad's Code is our formal document that establishes the behavioural qualities expected of the Group and all of its employees. The Code highlights and reinforces key areas of ethical and legal conduct, including personal behaviour, particularly those that are related to business activities.

Our Code is not exhaustive, as we cannot cover all issues encountered or situations faced by our employees while working for the Company. However, the Group has developed (and will develop even more) policies detailing the procedures, directives and guidelines for supporting, promoting and ensuring compliance with our Code.

### 3. Applicability

This Code applies to all Group employees, executive officers and Board members. The Board must approve any waiver of this Code by directors or executive officers.

### 4. Reporting

Committed to the highest standards of ethical behaviour, transparency and accountability, the Company has provided a confidential and secure mechanism through which our employees, suppliers, service providers, business partners and other stakeholders can report any conduct that contravenes our established values without fear of reprisal.

### 5. Conducting Business with Integrity

The Company and its employees shall always conduct business in exemplary behaviour: ethically, fairly, honestly and with integrity. An employee must not exploit any other person or business partner by engaging in illegal practices (such as misleading and deceptive conduct, misrepresentation and undue influence) and tactics which are legal but unethical.

#### *5.1 Compliance*

We adhere to all regulatory compliance in all countries where we operate. Regulatory compliance refers to complying with all of the laws, by-laws, ordinances, rules, regulations, directives, license or permit conditions, codes, standards and terms and conditions of agreements and contracts.

Given that the failure to comply with any regulation can impact the operation of the Group each subsidiary and partner of the Company must familiarise themselves with the laws, by-laws, ordinances, rules, regulations, directives, license/permit conditions, codes, standards and terms and conditions of agreements and contracts that are applicable to their business functions and roles.

### *5.2 Conflict of Interest*

Conflict of interest is the scenario wherein an employee's personal interest interferes with the interests of the company. A conflict of interest may arise when an officer, director or employee performs an action or holds an agenda that prevents them from performing their company duties and responsibilities honestly, objectively and effectively.

Therefore, an employee must not engage in external activities that may contradict the company's interests, interfere with their responsibilities as Cuscapi Berhad's employees and potentially damage or misuse the company's reputation, relationships, confidential information and other assets.

### *5.3 Giving and Receiving Gifts and Entertainment*

In principle, employees are prohibited from accepting gifts from any vendors, suppliers, service providers, contractors, customers and any party that may compromise the employees' judgement or decision. However, given the cultural and racial demography of Malaysia, gift giving and receiving as well as attending and holding gatherings are customary, especially during festivals and religious occasions.

However, as a general rule, the receiving and giving of gifts, such as promotional items, are acceptable provided that the cost does not exceed RM200.00. An employee should not feel entitled to receive and exercise business courtesy.

The prudent course is to refuse a courtesy from a supplier or service providers, most especially in cases where the Company is involved in choosing or reconfirming a supplier or service provider or under circumstances that would create an impression that offering courtesies would guarantee obtaining business.

*Note 2: Please refer to the Employee Handbook*

## **6. *Securities and Insider Trading***

The use or disclosure of non-public or 'inside' information about the Group for economic or any other benefit is not only unethical but also unlawful.

The Company will not tolerate the improper use of inside information. Material inside information refers to any information which is unavailable to the general public and which could reasonably influence an investor to buy, sell or hold stock or securities. Questions often arise as to whether a non-public information is 'material'. In general, information regarding a company would be considered material if it is essential to an investor in deciding whether to buy, sell or hold securities.

In the course of employment in Cuscapi Berhad, an employee may become privy to financial and non-financial information that has not been made public.

*Note 3: Please refer to the Corporate Governance Report published on the website*

**7. Product Quality Policy**

To be recognised and trusted by our customers to deliver excellence, we are committed to never compromise the quality of our services.

**8. Employees**

At Cuscapi Berhad we value our diversity. Each of our employees brings distinct experiences, talents and perspectives to our work. Such diversity makes us more competitive and stronger, thereby allowing us to offer our very best service to our clients.

*8.1 Equal Opportunity and Diversity*

The Group strives to maintain a professional environment rooted on respect, tolerance and inclusion. It is our policy and practice to never discriminate in any decision, including hiring, compensation, promotion, discipline or termination. Discrimination or harassment, including both verbal and physical discrimination, will not be tolerated. This includes discrimination based on race, colour, nationality, ancestry, gender, marital status, religion, age, or any other characteristic.

Our zero-tolerance policy extends to all employees and parties with whom we engage in business, such as vendors, suppliers, service providers, contractors, consultants and customers.

*8.2 Workplace Health and Safety*

The Company is obligated to provide a violence-free, healthy and safe working environment to employees and other parties. All employees are expected to contribute in ensuring their own safety and the safety of others in the workplace. Everyone must be safety-conscious at all times.

*Note 4: Please refer to the Employee Handbook*

**9. Environmental and Community Responsibilities**

The Group is committed to being a responsible corporate citizen. To satisfy the expectations of our stakeholders, we exert considerable efforts to integrate sustainable activities into our business operations and services. As such, we endeavour to:

- Actively assess, manage and minimise the environmental impacts of all of our operations; and
- Develop and participate in community programmes which enhance and embrace the community in which we operate.

**10. Communication and Review**

The Code will be communicated to all employees, and the company shall provide necessary training to ensure that all employees understand the Code.

The Code will to be regularly reviewed by the Board as often as necessary.