MKH BERHAD

Registration No: 197901006663 (50948-T)

CODE OF BUSINESS ETHICS

(VENDORS AND BUSINESS ASSOCIATES)

Code of Business Ethics (Vendors and Business Associates)

Background

MKH Berhad (**"MKH"** or **"Company"**) and its subsidiaries (the **"MKH Group"** or **"Group"**) is dedicated to maintaining the highest standards of ethics and integrity. This Code of Business Ethics (the **"Code"**) is formulated to enhance the standards of corporate governance and corporate behaviour with the intention of achieving the following aims:

- to establish a standard of ethical behaviour for suppliers, service providers and business associates of the Group based on mutual trustworthiness and values that are acceptable;
- to uphold the spirit of integrity and social responsibility in line with existing rules, regulations and guidelines for conducting business; and
- to formalise and inculcate ethical values through the Code and ensure their implementation and compliance.

Scope of, and compliance with, the Code of Conduct

This Code is based on the principle that the MKH Group intends to form a business relationship with its Vendors and Business Associates, and any third parties performing business or service for or on behalf of the Group (collectively known as **"Covered Person"**) which is built based on mutually acceptable standards of business ethics, including openness, transparency, accountability and integrity.

All Covered Persons are expected to adhere to this general principle as well as to comply with all the specific provisions of this Code that are applicable to them and other policies adopted by the MKH Group.

Failure to observe these policies may result in a review of business relationship, including, but not limited to, a review of contracts or termination of business relationship. Furthermore, violations of this Code may also constitute violations of the law and may result in civil or criminal penalties.

Compliance with laws

The Group conducts its business in accordance with all applicable laws and regulations. Compliance with the law does not comprise the MKH Group or a Covered Person's entire ethical responsibility. Rather, it is a minimum, essential condition for the performance of the Group's and a Covered Person's duties.

This Code highlights issues, but does not attempt to cover every circumstance which may arise. When conducting business with or for the Group, Covered Persons are responsible for knowing and complying with all applicable laws and regulations and are urged to consult with their respective liaisons in the MKH Group or the Group's Compliance Officer as to questions concerning these laws and regulations.

Fair Business Dealings

The Group conducts business on the basis of fair business terms considering, amongst others, the quality, pricing, reliability, availability, etc., of the goods and services in the best interest of the Group's business. MKH Group expects a Covered Person to conduct business, either with the Group or on behalf of the Group, with integrity, honesty, fairness, openness, and transparency. Information provided by person associated in the conduct of business shall be accurate and not misleading.

The Group prohibits the use of **"side agreement"** which is:

- intended to circumvent an official primary agreement or contract; or
- drafted between other third parties other than, and without the consent of, the parties involved in the primary agreement or contract.

Accountability

The Group expects a Covered Person to be fully accountable for the delivery of contractual obligations, including services rendered and goods provided, on a timely basis in accordance with specific agreements, contracts, or undertaking made with the Group.

Conflicts of interest

Covered Persons must be sensitive to activities, interests or relationships that interfere with, or which appear to interfere with, the fundamentals of the business relationship between the Group and the person associated. These activities, interests or relationships are considered "conflicts of interest". Conflicts of interest situations may impair, or appear to impair, the independence or objectivity of the decision-making process in relation to business decisions between the MKH Group and person associated or any judgment a person associated may need to make on the Group's behalf. This includes, but is not limited to, direct or indirect relationships with a Director or Management of the Group that may compromise objective decision-making process within the MKH Group.

If a Covered Person discovers that, as a result of changed circumstances or otherwise, he/she has become involved in a conflict of interest in a manner that violates or may violate this Code, the Covered Person must report that conflict to his/her liaison in the MKH Group or the Group's Compliance Officer as soon as the matter comes to his/her knowledge.

As it is impossible to describe every potential conflict of interest, we necessarily rely on the Covered Person to exercise good judgment, to seek advice when appropriate and to adhere to ethical standards in the conduct of a Covered Person's professional and personal affairs.

Confidential information

No Covered Persons shall use non-public information or confidential business information **("Insider Information"**) for personal benefit or the benefit of other persons. Covered Persons are prohibited to provide information to others, including, but not limited to, family, friends and business associates relating to the Inside Information until the Insider Information is publicly released.

Anti-bribery and corruption

Bribery and corruption acts involve the promising, offering, authorising, soliciting or accepting of gratification, not confined to monetary form, as an inducement to gain or provide, or as a reward for having gained or provided, an undue advantage in which cases such acts could influence the intended recipient's judgement, views or conduct.

Henceforth, Covered Persons are strictly prohibited from attempting to, directly or indirectly, promise, offer, authorise, solicit, or accept any gratification, to or from anyone, as the case may be, that constitutes, or could reasonably be perceived as constituting, unfair business inducements or that would violate laws or regulations or our other policies, when conducting business for or on behalf of the Group. Covered Persons are required to comply with the Anti-Bribery and Corruption Policy established by the Group. Violations of this provision of the Code or the Group's Anti-Bribery and Corruption Policy may constitute violations of the law and may result in civil or criminal penalties.

Anti-money laundering and terrorism financing

The MKH Group does not engage in any money laundering or terrorism financing activities and it does not associate itself with such criminal activities of others within its business operations. The Group shall not hesitate to act in accordance with applicable laws and regulations to report any suspicious activity to the authorities, where required.

Covered Persons performing business for or on behalf of the Group understand and agree that counterparty due diligence may be required to be performed on them for the Group to understand their business and background, including, but not limited to, details of Directors and shareholders, source of proceeds or funds, etc.

Rights to Audit Suppliers, Service Providers and Business Associates

Subject to the provisions of the business arrangement with the Group, MKH retains the right to audit, at its own cost and expense, its suppliers, service providers and business associates in relation to adherence to the Group's Code of Business Ethics (Vendors and Business Associates), as and when necessary. Covered Persons shall cooperate and provide the Group's auditors with the information and documents required, especially if the audit is one that is required in relation to compliance with laws and regulations.

Integrity and Background Declaration

MKH may require the provision of an integrity and background declaration by certain Covered Persons at a different frequency (e.g. annually, bi-annually, etc.) as determined by the Group. Such requirement does not indicate any form of suspicion or distrust, rather they serve as a control measure to protect the integrity of the business relationship between the Group and the Covered Persons.

Accountability for adherence with this Code

The Board of Directors (**"Board"**) of MKH Malaysia enforces this Code. If an alleged violation of this Code has been reported to it, the Board (or its nominated persons) shall determine whether that violation has occurred and, if so, shall determine the next course of actions to be taken.

Review of this Code

This Code was reviewed and approved by the Board of MKH on 27 February 2025 and is subject to a review at least once every three (3) years.

ACKNOWLEDGEMENT FORM

CODE OF BUSINESS ETHICS

I hereby acknowledge that I have read the Code of Business Ethics of MKH Berhad and its subsidiaries ("MKH Group") and fully understand the contents therein.

In the course of carrying out my roles and responsibilities according to the terms of contractual arrangement, I agree to remain committed to acting in accordance with the highest standards of honesty, integrity and transparency in every business activity.

I hereby declare that I have complied, and agree to continually comply, with the Code of Business Ethics during the course of my business relationship with companies in the MKH Group.

I understand that if I fail to comply with any part of the Code of Business Ethics, I may be subjected to appropriate actions by MKH under the circumstances, including possible review of business relationship or termination of any contract, appointment, or engagement with the MKH Group.

Name:
Signature:

NRIC No.:
Company/ Entity Name:
Date:

Note: If you have not or are unable to fulfil any section of the Code of Business Ethics indicated above, please contact your liaison personnel in the MKH Group or its Compliance Officer immediately for clarification and remedial measures to be taken.