



MY E.G. SERVICES BERHAD
[Registration No. 200001003034 (505639-K)]

CODE OF BUSINESS ETHICS

MY E.G. Services Berhad

Date: 30 April 2020

1. Introduction and Scope

MY E.G. Services Berhad (“MYEG” or the “Company”) and its subsidiaries (the “Group” or “MYEG Group”) is committed to conducting its business with integrity and in an ethical manner. The Group expects the same from Internal Stakeholders (e.g. Directors and Employees) and Business Associates (including but not limited to service providers, suppliers, business partners, joint venture entities and partners, associate companies, distributors, consultant, contractors, agents, and any third party performing service for or on behalf of the Group) of the Group, regardless of country of operation

This Code of Business Ethics (this “Code”) sets out the standards of ethical business practices and conduct that the Group expects from all Business Associates of the Group.

It is expected that this Code is complied with by the Group’s Business Associates, especially in the carrying out of business on the Group’s behalf, in all countries in which the Group operates. Business Associates shall have the responsibility to ensure their personnel comply with this Code.

2. Acting with Integrity

The Group conducts business with all parties on the basis of integrity, accountability, fairness, openness, and transparency across all of its business operations, including but not limited to, research and development, sourcing and procurement, sales and marketing, as well as dealings with other external parties.

Similarly, the Group also expects the same level of integrity, accountability, fairness, openness, and transparency to be upheld by its Business Associates when doing business with, on behalf of, and for the Group.

3. Abide by the Rule of Law

The Group, in conducting business and operations, is committed to comply with all applicable laws and regulations. The Group avoids any business practices that expose the Group to a risk / risks of breaching laws and regulations which will affect the Group’s reputation and trust.

Business Associates, when doing business with, on behalf of, and for the Group, shall understand, familiarise, and comply at all times with the applicable laws and regulations, including those relating to, but not limited to, the following:

- fair competition;
- anti-bribery and anti-corruption;
- anti-money laundering and anti-terrorism financing;
- insider trading and market manipulation;
- the preservation of environmental quality; and
- human rights and labour practices.

4. No Discrimination

The Group does not accept any form of discriminatory behaviour, such as on the basis of race, age, gender, religion, country of origin, sexual orientation, marital status, disability, or political views, within its business boundaries in whatsoever forms, including in business-related decisions or in the form of personal or collective harassments.

5. Modern Slavery and Child Labour

Business Associates shall not use or permit the use of forced labour, trafficked labour, or child labour within its business operations. Minimum age for legal employment shall be in accordance with applicable local laws.

6. Anti-Bribery and Anti-Corruption

The Group has a zero-tolerance approach to bribery and corruption and will not pay or receive any bribes to or from anyone for any purpose. Likewise, Business Associates of the Group are prohibited from soliciting, accepting, offering, giving, promising to give or to receive any form of bribes when doing business with, on behalf of, and for the Group.

All Business Associates shall refer to and comply at all times with the Group's **Anti-Bribery and Anti-Corruption Policy** including any other anti-bribery and anti-corruption measures imposed by the Group.

Business Associates shall note that any attempted bribery or bribery conduct, whether as a giving or a receiving party, may cause a person to be liable for a fine or imprisonment in accordance with applicable laws, e.g. Malaysian Anti-Corruption Commission Act, 2009.

7. Avoiding and Declaring Conflict of Interest Situations

Business Associates shall avoid situations where there could be an actual, potential, or perceived conflict of interest. Business Associates shall declare any conflict of interest situations arising that may impact the objectivity of business dealings or business relationship.

8. Protection of information

Access to information which belongs to or is handled by the Group's businesses shall be bound by the limitations of applicable laws and regulations and the business arrangement between the Group and the Business Associates. Business Associates shall be responsible for maintaining and protecting any information accessed and shall not utilise this information or knowledge, directly or indirectly, for any use beyond the boundaries of the applicable laws and regulations or the applicable business arrangement.

9. Integrity of Capital Markets

MYEG is a public listed company on the Main Market of Bursa Malaysia, and it is subject to the Capital Markets and Services Act 2007 and relevant laws and regulations pertaining to the preservation of capital markets integrity.

Business Associates shall not, directly or indirectly, tip-off or conduct trading based on any inside information obtained from during the course of doing business with, on behalf of, and for the Group, regardless whether they will personally benefit.

10. Anti-Money Laundering and Anti-Terrorism Financing

The 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 or value chain. The Group will not hesitate to act in accordance with applicable laws and regulations to report any suspicious activity to the authorities where required. Business Associates shall not be involved in or associated with any money laundering or terrorism financing activities.

11. Maintaining proper records

Complete and accurate financial records and other relevant records relating to the Group's businesses and transactions shall be maintained by all Business Associates and they should conform to generally accepted and applicable accounting principles and to all applicable laws and regulations.

No unauthorized, false, improper or misleading records or entries shall be made in the books and records of the Group or in relation to the Group's businesses, under any circumstances.

12. 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 businesses.

Business Associates are expected to do business with, on behalf of, and for the Group with integrity, accountability, fairness, openness, and transparency.

Information provided by Business Associates in the conduct of business shall be accurate and not misleading.

13. Accountability

Business Associates shall be fully accountable for the delivery of their contractual obligations, including service rendered and goods provided, on a timely basis in accordance with specific agreements, contracts, or undertaking made with the Group.

14. Rights to Audit Business Associates

Subject to the provisions of the business arrangement with the Group, the Group retains a right to audit its Business Associates, at the Group's own cost and expense, in relation to adherence to this Code or any other focus areas mutually agreed upon. In such situations, Business Associates shall co-operate 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.

15. Compliance and Support

It is mandatory for the Business Associates to comply with this Code. Any violation of this Policy will be dealt with seriously by the Group, including but not limited to review of business relationship, termination of business contracts, and reporting to the authorities, as consistent with relevant laws and regulations.

Business Associates with any concerns or queries or requiring support and advice pertaining to compliance with this Code shall consult with their liaison within the Group.

16. Acknowledgment and Declaration

All Business Associates are required to complete the Acknowledgement and Declaration Form (Appendix I of this Code).

Exceptions to this requirement shall be approved by the Managing Director.

17. Reporting of violations of this Code

The Group strongly encourages any person, including the general public, who knows of, or suspects, a violation, suspected violation, or potential violation of this Code to report to MYEG for immediate actions to be undertaken to address the issue.

Concerns shall be reported through the Group's Whistle Blowing Policy and mechanism, which is available on the Group's corporate website. All reports will be treated confidentially.