



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

CODE OF CONDUCT

MY E.G. Services Berhad

Date: 28 February 2024

1. Introduction

MY E.G. Services Berhad (the “Company”) has adopted the following Code of Conduct (the “Code”) for Directors, management and Officers of the Company and its subsidiaries (“the Group”). This Code is established to promote the corporate culture which engenders ethical conduct that permeates throughout the Group. All Directors, management and Employees (including permanent, temporary, contract-based, and interns, amongst others) of the Group shall be referred to as “Officers” hereon.

2. Purpose

This Code is formulated with the intention of achieving the following aims:

- 2.1** To emphasize the Group’s commitment to ethics and compliance with the applicable laws and regulations;
- 2.2** To improve the employee’s self-discipline in order to meet the Group’s commitment to ethics and compliance to laws and regulations and to meet the Group’s objective of providing good and quality service; and
- 2.3** To enhance skills in the implementation of duties and to be able to adapt to the work environment.

3. Code of Conduct

In the performance of his or her duties, each Officer must comply with the letter and spirit of the following codes:

3.1 Human Rights

The Group supports and respects human rights. The Group treats Officers with dignity and respect in the workplace, provides equal employment opportunities, creates a safe and harmonious work environment, and will not engage in any form of discrimination. Officers should respect the personal dignity, privacy and rights of each individual they interact with during the course of work and shall not in any way cause or contribute to the violation or circumvention of human rights.

3.2 Health and Safety

The Group provides a work environment that is safe, conducive, secure and free of danger, harassment, intimidation, threats and violence. The Group takes appropriate precautions to prevent injuries or adverse working conditions for each and every officer.

3.3 Environment

The Group conducts operations in a manner that safeguards health, protects the environment and conserves valuable materials. The Group is committed to protecting the environment by minimising and mitigating environmental impactstthroughout the life cycle of operations. Officers should contribute to minimising the use of finite resources, including energy, water and raw materials. Officers should minimise harmful emissions to environment, including waste, air emissions and discharges to water.

3.4 Corruption and Bribery

The Group has a zero-tolerance approach towards any form of bribery or corruption and Officers shall not give or receive any bribes, especially in the conduct of activities relating to the Group. Officers shall read, understand, and comply with the Group's Anti-Bribery and Anti-Corruption Policy and the Group's other relevant policies and procedures for combating corruption.

3.5 Gifts, Entertainment, Hospitality, and Third-Party Travel

Officers must exercise caution in relation to offering or accepting gifts, entertainment, and hospitality, other business courtesies.

Due to business needs, business-related travel expenses may be provided by the Group to external parties or received by the Officers from external parties (i.e. Third-Party Travel).

Officers shall exercise caution when promising, giving, or authorising Third-Party Travel for external parties on behalf of the Group and when accepting Third-Party Travel from external parties.

Officers should refer to the Group's Policy on Gift, Entertainment, Hospitality, and Third-Party Travel for the giving and accepting of gifts and business courtesies.

3.6 Conflict of Interest

Officers shall avoid situations where there could be an actual, potential, or perceived conflict of interest situations which may compromise or potentially compromise the Officer's ability to act in the best interest of the Group.

Officers must disclose and declare their interest via the "Conflict of Interest Declaration Form" as set out in Appendix A, in the contemplated transaction or contract of any actual conflict of interest, potential conflict of interest or perceived conflict of interest.

This should be read in conjunction with the Conflict of Interest Policy of the Company.

3.7 Group Records and Internal Controls

The Group's business records must be prepared accurately and honestly, by any of the Group's Officers who contribute to the creation of these business records. The Group is obligated to maintain business records for operational, legal, financial, historical and other purposes and must take appropriate steps to ensure that the content, context and structure of the records are reliable and authentic.

Reliable internal controls are critical for proper, complete and accurate accounting, financial and operational reporting. Officers must understand the internal controls relevant to their positions and comply with the policies and procedures related to those controls to ensuring that effective and reliable business processes are in place.

3.8 Company Assets

The Group's properties and assets should be managed and safeguarded in a manner which protects their values. Officers are accountable both for safeguarding all assets entrusted to them, including information resources, records, materials, facilities and equipment under their care or control, from loss, theft, waste, misappropriation or infringement and for using the assets to advance the interests of the Group. All Officers have an affirmative duty to immediately report the theft, loss or misappropriation of any of the Group's assets, including financial assets, physical assets, information assets and electronic assets to the management as stipulated under Violations of Code of Conduct below.

3.9 Commitment

The Group expects each and every Officer to give their fullest attention, dedication and efforts to their duties. Officers must avoid any personal, financial or other interest which may be in conflict with their duties and responsibilities to the Group.

3.10 Integrity and Professionalism

All Officers should conduct themselves with the highest degree of integrity and professionalism in the workplace or any other location while representing the Group in any business matters.

3.11 Personal Appearance

An Officer is expected to be suitably and neatly dressed so as to maintain an appropriate appearance that is business like, neat and clean, as determined by the requirements of the work area. Dress and appearance should not be offensive to customers or other Officers.

3.12 Confidential Information

All information obtained in the course of engagement and/or employment with the Company shall be deemed to be strictly confidential and shall not be disclosed to any third party. This measure applies to all Officers both during and after the service with the Company.

Those who have left MYEG are expected to maintain confidentiality of proprietary and sensitive information acquired in the course of employment with MYEG.

Except with the permission of the Group, an Officer shall not make any unauthorised public statement, circulate, divulge or communicate with any customer, member of the public, media or government or statutory bodies on the policies or decision of the Group on any issue, or any other information or details in respect of the Group's business. This applies to disclosures by any medium, including the internet, especially via social media sites (e.g. Facebook, Twitter, YouTube, TikTok), internet message boards and/ or blogs. An Officer must take precautionary steps to prevent the unauthorised disclosure of proprietary or confidential information, including protecting and securing documents containing this information.

Personal records and remuneration including the Officer's own remuneration are classified as Private and Confidential information and shall not be divulged. Officers who possess and/or has control over or authorises the processing of personal data must ensure that all personal data handled are protected thereby safeguarding the interests of each individual involved. The Company and Officers involved in processing personal data must comply with any relevant rules, regulations and legislations and controls that are put in place to protect the privacy of the personal information.

3.13 Anti-Money Laundering

Money laundering is the process of concealing, converting and transferring proceeds from unlawful activities to a legitimate source of income or asset. Money laundering is an offence under the Anti-Money Laundering and Countering Financing of Terrorism Act 2001 in Malaysia.

Officers shall be aware of the applicable anti-money laundering laws and shall seek to ensure that they are appropriately and adequately informed of developments in the laws relating to this area in order to actively pursue the prevention of money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities. Officers are expected to be mindful of the risk of the Group's business being used for money laundering activities and to raise any suspicious transactions to their immediate superior and the Board to undertake further investigation.

3.14 Compliance Obligations

Officers are responsible for knowing and complying with the requirements applicable to their work activities, including those described in Rules of Conduct and Disciplinary Procedure in the Employee Handbook and those described in the Company's guidance documents (Company's standards, policies and procedures and manuals).

4. Communication and Compliance

The Board should ensure this Code is being communicated to all levels of Officers through staff handbook, notice board, intranet, or corporate website. The Company should include the briefing of this Code to new Officers in the induction programme.

The Board should ensure this Code permeates throughout the Group and is complied with by all levels of Officers.

5. Acknowledgment and Declaration

All Officers 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.

6. Violations of Code of Conduct

All Officers should report to their supervisors, managers, Heads of Departments or Head of Human Resource about any known or suspected illegal or unethical behaviour. The Company's Executive Directors and Senior Management shall promptly report any known or suspected violations of this Code to the Board.

All Officers shall also refer to and adhere to the Whistle Blowing Policy.

7. Investigations

The Company shall investigate reported concerns promptly and confidentially with the highest level of professionalism and transparency. All internal investigations and audits are conducted impartially and without predetermined conclusions. Each and every officer shall be expected to cooperate fully with audits, investigations and any corrective action plans, which may include areas for continued monitoring and assessment.

8. Periodic Review

This Code should be reviewed periodically by the Board in accordance with the needs of the Company. Changes to the Code shall be communicated to all Officers. This COC shall be made available on the Company's website.

This Code is updated on 28 February 2024.