

NESTCON BERHAD

CODE OF BUSINESS CONDUCT AND ETHICS

This Code of Conduct applies to all directors, officers and employees of the Company. It outlines behaviours expected of Nestcon's employees as we work and interact with customers, suppliers, fellow employees and other stakeholders.

Compliance with Laws and Regulations

All directors, officers and employees of Nestcon must abide by applicable laws and regulations at all times. Employees with questions regarding the applicability or interpretation of any law or regulation should seek advice from the Company's appointed external lawyer to ensure compliance with the law.

Avoid Conflicts of Interest

All employees are expected to act in the best interests of the Company. Employees are not allowed to engage in activities that might create a conflict of interest between their obligations to the Company and their personal interests. Employees are not allowed to use any Company information, property or their position with the Company for any improper personal gain or benefit to another individual. Situations that might create the appearance of a conflict of interest should also be avoided.

Insider Trading Policy

Employees are not allowed to trade in the Company's securities while in possession of "material" corporate information that has not been disclosed to the public. Material corporate information may include key business and financial data, award or termination of a major contract, merger and acquisition discussions, changes in key management and other similar information that may have an impact on the Company's share price once released. Employees are also prohibited to pass on material non-public information to others.

Abide by Antitrust and Competition Law

The Company will compete fairly and ethically, not through any illegal practices which may restrain competition in the marketplace. All Nestcon's employees are not allowed to enter into discussions or agreements with competitors, customers or other business partners, where the purpose of such discussion or agreements is to fix or control prices or boycott certain suppliers or customers.

Record Keeping and Financial Integrity

The Company's books, records, accounts and financial statements must properly document and accurately reflect the Company's transactions and must be maintained in accordance with both Company policy and applicable laws and regulations. The Company requires full, fair, accurate, timely and understandable disclosure in financial reports and documents filed with or submitted to Bursa and other regulators, and in all other public disclosure documents made by the Company.

Protect Company Assets

Employees are responsible for safeguarding all Company assets such as furniture, equipment, computer information systems, financial reports, customer and supplier information and all other forms of physical or intellectual property owned by the Company. Misuse of Company assets for personal gain is prohibited and may constitute an act of fraud against the Company.

Report any Illegal or Unethical Behaviour

All employees are expected to maintain high standards of integrity and act in accordance with relevant legal and regulatory obligations. Suspected illegal or unethical conduct in violation of this Code must be reported to the management or other relevant authorities. Retaliation against employees who report alleged misconduct in good faith will not be tolerated.

Waivers

A waiver from the Code of Conduct with respect to any director or executive officer of the Company may only be made by the Board of Directors and will be promptly disclosed as required by law and Bursa.