AGMO HOLDINGS BERHAD
Registration No. 201701000550 (1214700-W)
(Incorporated in Malaysia)

CODE OF ETHICS AND CONDUCT

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1. INTRODUCTION

AGMO HOLDINGS BERHAD ("**Agmo**" or "**the Company**") and its subsidiaries ("the "**Group**" or "**Agmo Group**") are committed to the highest standards of integrity and accountability in all its business dealings and relationships with its employees, customers, shareholders, business associates, regulators, and the public.

This Code of Ethics and Conduct (the "**Code**") stipulates the sound principles to guide all Directors and employees of the Group in the conduct of our business.

2. SCOPE

The Code applies to all Directors, employees (including permanent, temporary, full-time, part-time, probationary, contract employees, trainees and interns) and officers of the Group, in the discharge of their duties and responsibilities and in their dealings with stakeholders.

3. COMMITMENT AND COMPLIANCE

The Group is committed to ensuring compliance with all applicable laws, rules and regulations relevant to its business activities. The Group shall ensure that its Directors, officers and employees understand, observe and comply with the laws, rules and regulations applicable to their respective roles and responsibilities, and conduct business activities with integrity.

The Group is also committed to preventing violations of applicable laws and encouraging the reporting of any suspected or actual violations within the Group.

Compliance with the principles set out in this Code is an essential element of the Group's business success. The Group, through its People and Culture Department, shall ensure that the principles contained in this Code are effectively communicated, understood and observed by all Directors, officers and employees.

Compliance with this Code shall be monitored and reported by the internal auditors and reviewed periodically by the Board of Directors.

4. PRINCIPLES OF THE CODE

4.1 Competition

The Group is committed to conducting its business ethically, fairly and in compliance with applicable competition laws, and to treating all suppliers, customers and vendors fairly and consistently. The Group shall endeavour to offer its products and services on suitable and competitive terms, and to deliver such products and services honestly and fairly in order to meet stakeholders' expectations. Accordingly, false or misleading statements or representations are strictly prohibited.

4.2 Protecting Confidential Information

All information relating to the financial, personal or business affairs of customers, suppliers, employees and other parties, which is collected or obtained by the Group, shall be treated as confidential and adequately protected.

Such information shall not be disclosed or shared with any unauthorised person or third party. Directors, officers and employees of the Group must not engage in the unauthorised use, disclosure, copying or distribution of such information.

4.3 Conflict of Interest

Directors, officers and employees of the Group must avoid any relationship, activity or situation that may impair their ability to exercise objective and independent judgment in the discharge of their duties and responsibilities.

They must not misuse the Group's property, information, resources or position for personal interest or gain, or engage in activities that compete with or conflict with the interests of the Group. All actions, decisions and activities undertaken within the Group shall be in the best interests of the Group.

Directors and employees shall promptly declare any actual, potential or perceived conflict of interest in accordance with the Group's policies and procedures. Any person who is uncertain whether a situation may give rise to a conflict of interest should seek guidance from Management before engaging in such activity, transaction or relationship.

4.4 Gifts, Entertainment and Corporate Hospitality

Directors, officers and employees of the Group shall exercise proper care and judgment in relation to gifts, entertainment and corporate hospitality, and shall comply with the Group's Anti-Bribery and Anti-Corruption Policy and applicable internal procedures.

4.5 Whistleblowing Policy

The Group is committed to fostering a culture of integrity, accountability and transparency. Any person who becomes aware of any actual or suspected misconduct, violation of laws, regulations, policies or unethical conduct is encouraged to report such concerns in accordance with the Group's Whistleblowing Policy.

All reports shall be handled in accordance with the Group's Whistleblowing Policy, including the safeguards relating to confidentiality and protection against retaliation.

4.6 Sustainability and Responsible Business Conduct

The Group is committed to conducting its business in a responsible and sustainable manner, taking into consideration environmental, social and governance ("**ESG**") factors, ethical business practices and stakeholder interests in its business activities and decision-making processes.

Directors, officers and employees are expected to support the Group's sustainability objectives and conduct business responsibly, ethically and in compliance with applicable laws, regulations and internal policies.

5. REVIEW AND MONITORING

This Code shall be reviewed by the Board at least once in every three (3) years to ensure it remains consistent with the Group's objectives and the relevant laws and legislation.

This Code was updated and acknowledged by the Board of Directors on 26 May 2026.