



LEON FUAT BERHAD

Registration No. 200601036648 (756407-D)

CODE OF ETHICS AND CONDUCTS

This Code of Ethics and Conduct (the “Code”) affirms Leon Fuat Berhad’s (the “Company”) commitment and dictates the ethics and standard of good conduct expected of the directors, management and employees of the Company and its subsidiaries (the “Group”) (“Affected Person”).

In the performance of his duties and responsibilities, an Affected Person must comply with the spirit of the Code.

1. Ethical Standards and Duties

- 1.1 An Affected Person is required to observe the Code and is expected to uphold the ethical standards and behaviour and operate in a manner consistent with the Group’s values and all applicable laws, rules and regulations affecting the Group.
- 1.2 An Affected Person shall conduct himself with integrity, professionalism and act in an ethical manner and at all time faithfully and diligently carry out his duties to the best of his ability.
- 1.3 As Affected Person shall ensure that he does not make misrepresentations, whether oral or written, in all dealings with the customers, suppliers, employers, employees and members of the public.

2. Compliance with Laws and Policies

- 2.1 An Affected Person shall at all times:
 - Complies with the Company’s policies and processes;
 - Be accountable and adhere to the Code; and
 - Abides by the relevant applicable laws, rules and regulations.
- 2.2 An Affected Person shall also comply with all applicable anti-money laundering, anti-corruption and anti-bribery legislations and prohibits from undertaking any money laundering activities and any corrupt practices relating to the business activities of the Group including any acts to be carried out by any person(s) associated with the Affected Person or the Group for the benefit or advantage of the Group.

3. Conflict of Interest

- 3.1 An Affected Person has a duty not to place himself in a position which gives rise to, or is perceived to give rise to, a real or substantial possibility of conflict, whether it be a conflict of interest or conflict of duties.

- 3.2 If an Affected Person becomes aware that he has a direct or indirect interest in an existing or proposed transaction or arrangement with the Company and/or its subsidiaries, he shall, as soon as practicable after the relevant facts have come to his knowledge, disclose his interest to the Company.
- 3.3 Interests in the proposed transactions should be notified before the transaction is entered into and the Affected Person has an ongoing duty to update any changes in these interests.

4. Misuse of Position and Information

- 4.1 An Affected Person must not make improper use of information acquired by virtue of his position and must not take improper advantage of his position to gain, directly or indirectly, a personal advantage or an advantage for any associated person, which may cause detriment to the Group. An associated person includes spouse, parent, child or sibling of the Affected Person or any company, corporation, partnership, trust or other entity owned or controlled by the Affected Person or in which the Affected Person has substantial personal interest.

5. Confidentiality of Information

- 5.1 An Affected Person must take all reasonable measures to protect the confidentiality of non-public information about the Group and other third parties obtained or created in the course of business dealings and to prevent the unauthorised disclosure of such information.

6. Company Properties

- 6.1 An Affected Person has the responsibility to protect the Group's properties, both tangible and intellectual property from loss, damage, misuse, theft or any form of vandalism. Properties of the Group assigned to an Affected Person are strictly to be utilised for work related purposes only and shall not be abused by the Affected Person.

7. Safety and Health

- 7.1 The Group is committed to achieving and maintaining the highest standards of occupational health and safety protection, and have a responsibility to meet this commitment by following all health and safety policies and procedures, as well as the applicable laws and regulations.
- 7.2 Any person including an Affected Person is required to report any unsafe working environment and conditions as well as any safety and health concerns to the Company immediately.

8. Non-Discrimination and Equal Opportunity

- 8.1 The Group is committed to providing a workplace that is free from any form of disrespectful behaviour or harassment and discrimination of all types.
- 8.2 The Group is committed to promoting fairness and equal opportunity covering recruitment and employment, promotions and other job-related programme in compliance with all applicable laws and regulations.

9. Reporting of Suspected Violations

- 9.1 Any suspected breaches of applicable laws, rules and regulations, the Company's policies and processes and the Code which directly or indirectly affect the Group's business must be reported in accordance with the Whistle-Blowing Policy of the Company which provides a transparent and confidential process for dealing with genuine concerns.

10. Review of the Code

- 10.1 The Code will be reviewed periodically and amended at any time as may be deemed appropriate to determine its adequacy.