



CODE OF CONDUCT AND BUSINESS ETHICS

SUMISAUJANA GROUP BERHAD
COMPANY NO: 202101023259 (1423559-T)

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1.0 EXECUTIVE SUMMARY

SumiSaujana Group Berhad (the “Company”) and its subsidiaries (“SumiSaujana” or the “Group”) are committed to upholding high standards of conduct and business ethics. The value of integrity is the cornerstone of this Code of Conduct and Business Ethics (“Code”). Therefore, every aspect of this Code reflects our commitment to performing with integrity.

This Code serves as a roadmap to guide actions and behaviours while working for and/or dealing with SumiSaujana. We expect and require each employee, as a representative of SumiSaujana, to uphold our commitment to ethical behaviour. Business representatives acting on SumiSaujana’s behalf are also required to adhere to this Code and maintain high standards of conduct and business ethics.

SumiSaujana conducts its business with honesty and integrity and respects the integrity of those with whom we do business. We are committed to fair and impartial practices and comply with all applicable laws and regulations. This principle extends to the Group’s business activities outside Malaysia. In every country where we operate, we shall adhere to local laws.

2.0 ILLUSTRATION

This diagram illustrates how this Code links to the Group’s Core Values and its policies and procedures. This implies that it must be interpreted in conjunction with the relevant policies and procedures.



3.0 RESPONSIBILITY AND ACCOUNTABILITY

3.1 Employees and Directors

All Employees and Directors are required to adhere to this Code. Ignorance of the Code's existence will not be considered an acceptable excuse for any violations. Disciplinary action will be taken against individuals who breach this Code. SumiSaujana mandates that all employees of the Group declare their acknowledgment of having read and agreed to comply with this Code. It is the responsibility of employees to stay informed of the latest updates to this Code, as they arise.

3.2 Managers and Business Unit Heads

Managers and Business Unit Heads, as business leaders, bear an enhanced responsibility to exhibit exemplary conduct and uphold integrity. They are also expected to consistently promote high standards of conduct and business ethics amongst employees, ensuring that ethical behaviour remains a fundamental aspect of the corporate culture at SumiSaujana. Employees are encouraged to seek guidance if they have any uncertainties regarding this Code. Please refer to Section 14, 'Getting Help', for guidance.

3.3 Vendors, Suppliers and Contractors

SumiSaujana expects all vendors, suppliers, contractors, subcontractors, consultants, agents, representatives, and service providers engaged in work or services for, or on behalf of the Group to adhere to this Code in their interactions with the Group. Our selection is based on the track records and the quality of their products and services. Additionally, our relationships with these entities should remain strictly professional to ensure independent business judgements are made.

3.4 Interpretation of this Code

This Code cannot anticipate every possible scenario in today's complex and dynamic business environment. Therefore, where applicable, it should be interpreted in conjunction with the Company's Anti-Bribery and Corruption Policy ("ABC Policy") and other relevant policies and procedures. In cases where the provisions of this Code conflict with or are inconsistent with any applicable laws or the Group's policies, the more stringent provisions shall take precedence. In cases of uncertainty, employees should seek assistance and clarification before taking any action. Please refer to Section 14, 'Getting Help', for guidance.

4.0 SUMISAUJANA AND ITS PEOPLE

4.1 SumiSaujana's Commitment

- SumiSaujana is committed to treating all individuals with respect and dignity, valuing both individual and cultural differences. The Group empowers its employees to utilise their individual and collective capabilities to deliver high-quality product and services, both internally and externally.
- The Group is dedicated to the well-being of its employees by fostering a work environment free from discrimination and harassment, and ensuring compliance with all regulatory requirements.
- SumiSaujana maintains a politics-free workplace and strictly prohibits office politics. Employees found violating this policy may be subject to severe disciplinary actions.
- Additionally, SumiSaujana strives to fulfil its corporate social responsibility through activities that encourage employee participation.

4.2 People's Commitment

- All employees are expected to uphold SumiSaujana's commitment to treat everyone with respect and dignity, and to value individual and cultural differences. Verbal abuse, threats or physical acts of violence or intimidation towards colleagues are strictly prohibited.
- Employees are also expected to protect and preserve the Group's brand and reputation, exercising due care in all representations of the Group.
- All employees are personally responsible for adhering to the ethical standards and legal requirements relevant to their job functions.
- Employees are expected to avoid engaging in office politics. Examples of office politics include, but are not limited to:
 - Forming informal groups that create conflicts, thereby undermining a healthy working environment;
 - Instigating or influencing others to go against the Group's directives or policies;
 - Advancing one's own interests or career at the expense of others;

- Undermining or disparaging colleagues to strengthen one's own position; and
- Pursuing personal agendas that are detrimental to the interests of the Group.

5.0 POLICIES AND PROCEDURES

- 5.1 The Group's policies and procedures are implemented to achieve business objectives through effective and efficient operations. Therefore, all policies and procedures must be strictly adhered to. Failure to observe these policies and procedures may result in disciplinary action.
- 5.2 Managers and Business Unit Heads should exercise reasonable care to ensure that effective systems of business controls are in place to ensure:
- Appropriate authority and responsibility are assigned to individuals;
 - Proper authorisation of transactions;
 - Accurate and adequate records are maintained;
 - Disclosure of information is on a need-to-know basis; and
 - Adequate segregation of duties to avoid conflicts of interest.

If any employee requires further clarification or believes that any policy or procedure is inappropriate or outdated, they are encouraged to discuss their concerns with their immediate supervisor.

6.0 CONFIDENTIAL, PROPRIETARY AND SENSITIVE INFORMATION

- 6.1 Employees are prohibited from disclosing any confidential, proprietary and sensitive information of the Group to family, friends, and any third parties, unless explicitly authorised by the Group or required by law. Examples of such information include, but are not limited to, trade secrets, financial and business forecasts, competitive bids, business acquisitions and any information that could impact the Group's business or share price. Such information must remain confidential until it is publicly disclosed.
- 6.2 Individuals who have left SumiSaujana are expected to continue to maintain the confidentiality of proprietary and sensitive information relating to SumiSaujana acquired during their employment.
- 6.3 All inquiries from the media or third parties regarding the SumiSaujana's business must be directed to the Corporate Affairs department. This ensures a consistent and professional approach in managing such matters.

- 6.4 Insider trading is illegal under the law and can take various forms. This includes the use or disclosure of price-sensitive information for personal gain or for the benefit of others. Employees who hold positions granting access to price-sensitive information are required to comply with the Group's policies, Securities Commission's regulations, Bursa Malaysia Securities Berhad's listing requirements, and any other applicable laws regarding the trading of the Company's securities.
- 6.5 A non-disclosure agreement (NDA) must be executed by vendors or any third parties who may have access to confidential and proprietary information to safeguard the interests of SumiSaujana.

7.0 ASSETS, PROPERTIES AND FACILITIES

- 7.1 Employees are expected to exercise reasonable care to safeguard SumiSaujana's assets and prevent any loss, damage, misuse or theft.
- 7.2 SumiSaujana will provide internet and email access to employees who require these facilities for their work. These resources are intended primarily for business purposes.
- 7.3 Employees with internet access must not use this network to engage in illegal activities, non-professional conduct, or any other activities that may damage SumiSaujana's reputation.
- 7.4 Employees are expected to protect SumiSaujana's intellectual property rights and ensure compliance with applicable laws and regulations. This includes, but is not limited to, SumiSaujana's name, logo, taglines and innovations. Any intellectual property created by employees in the course of their job responsibilities shall be the property of SumiSaujana.

8.0 GUIDELINES FOR AUTHORISED EMPLOYEES ON SOCIAL MEDIA

- 8.1 Definition – Social media encompasses internet-based tools used for sharing and discussing information among individuals. It refers to user-generated content, opinions and other material shared over open digital networks. This includes, but is not limited to:
- Social networking sites (e.g., Facebook, Instagram, LinkedIn, X (formerly Twitter), Threads, Snapchat);
 - Video and photo sharing platforms (e.g., YouTube, TikTok, Instagram);
 - Blogs, including corporate blogs and personal blogs (e.g., WordPress, Blogger);

- Blog hosted by media outlets (e.g. Says.com, Free Malaysia Today, Malay Mail);
- Wikis and online collaborations (e.g., Wikipedia, Google Docs);
- Forums, discussion boards, and groups (e.g., Reddit, Facebook Groups, Lowyat.net);
- Podcasting (e.g., Spotify, Apple Podcasts, YouTube);
- Instant messaging (e.g., WhatsApp, Telegram, Facebook Messenger, WeChat);
- Geo-spatial tagging (e.g., Instagram, TikTok, Google Maps, Foursquare); and
- Other emerging electronic or digital communication applications (e.g., Clubhouse, Twitch, Patreon, Shopee Live, Lazada Live).

8.2 Authorisation from the Chief Executive Officer is required for sharing and responding on behalf of SumiSaujana on social media. Authorised employees must:

- Disclose and comment only on information classified as public domain;
- Ensure that all published content is accurate, not misleading and complies with all relevant Group's policies and requirements;
- Refrain from being the first to make an announcement, unless specifically authorised to do so;
- Comment only within their area of expertise and authority;
- Ensure that comments are respectful of the online community with which they are interacting;
- Adhere to the terms of use of social media platforms or websites;
- Comply with all applicable laws, including those related to copyright, privacy, defamation, contempt of court, discrimination, harassment laws and the Group's policies;
- Avoid posting or responding to materials that are offensive, obscene, defamatory, threatening, harassing, oppressive, discriminatory, hateful,

racist, sexist, or that infringe on laws, breach court orders, or are otherwise unlawful;

- Refrain from using or disclosing any confidential or secure information; and
- Avoid commenting on or posting any material that could potentially damage SumiSaujana's reputation or bring it into disrepute.

9.0 SUMISAUJANA AND ITS CUSTOMERS

9.1 SumiSaujana is committed to delivering quality products and services to all customers. Employees are expected to handle business transactions professionally and provide high standards of customer care when addressing any complaints.

9.2 SumiSaujana is also dedicated to protecting the privacy of its customers' personal information. No employees should disclose customers' personal information to third parties unless it is done in accordance with the Group's policies.

9.3 All corporate or festive gifts given to customers must comply with the ABC Policy.

10.0 DEALING WITH SUPPLIERS, VENDORS, CONTRACTORS, AND PUBLIC OFFICIALS

10.1 Business dealings with others

- In order to protect the interests of SumiSaujana:
 - All business decisions must be made based on objective and independent judgment in the best interests of SumiSaujana, and must not be influenced by personal considerations or relationships, whether real or perceived;
 - All business negotiations should be conducted on arm's-length basis. SumiSaujana adheres to principles of integrity and fairness in its business dealings and expects the same from all parties involved;
 - Employees are prohibited from soliciting, offering, promising, giving, or receiving any form of payments, gifts, favours, or entertainment that could compromise the integrity, professional judgement, or evaluation of product, services, prices and performance of our vendors, suppliers or contractors; and

- Solicitation or acceptance of bribes in any form is considered serious misconduct and may result in termination of employment.

10.2 Conflict of Interest

- A conflict of interest arises when personal interests have the potential to interfere with an employee's objectivity in performing their duties or exercising judgement on behalf of SumiSaujana.
- A conflict of interest is deemed to exist when an employee's position results in an improper gain or advantage that adversely affects SumiSaujana's interests.
- Employees must immediately declare any real or perceived conflicts of interest to their Managers or Business Unit Heads. This includes conflicts involving themselves, other employees, or third parties. For example, an employee is required to disclose to the Group if their family members have any business dealings with SumiSaujana.

10.3 Receiving and Giving Business Courtesy

- As a general rule, employees should not accept gifts, entertainment, or hospitality from third parties who have business dealings with SumiSaujana. Such actions may compromise our integrity or affect our professional judgment in fulfilling our responsibilities to the Group. This prohibition includes, but is not limited to, items such as meals and beverages, travel and accommodation, tickets to sporting and cultural events, and discounts not available to the public.
- Under no circumstances is it acceptable to offer, give, solicit, or receive any form of bribe, kickback, facilitation payment or gratuity. This applies to all transactions, irrespective of whether the practice is commonly regarded as "a way of doing business," and regardless of whether the transaction involves individuals in the public or private sectors.

10.4 Exceptions to Clause 10.3 above include:

- Gifts that meet all the conditions and requirements outlined in the ABC Policy;
- Occasional and modest entertainment that occurs in the normal course of business;
- Occasional and appropriate levels of corporate hospitality; and

- Any other circumstances permitted under the ABC Policy.

10.5 Purchasing and Procurement

Acting in the best interest of SumiSaujana

- a) All procurement and purchasing decisions should be made solely in the Group's best interest, considering factors such as the suitability of products or services, price, delivery, and quality, and in accordance with the relevant standard operating procedures. Due consideration should be given to:
 - Treating all suppliers, contractors, or service providers fairly; and
 - Maintaining confidentiality by ensuring that no information is disclosed during the bidding process.
- b) All procurement or purchasing agreements should clearly document the services or products to be provided, including specific deliverable milestones, to facilitate independent verification if necessary.
- c) All monetary commitments must be approved in accordance with the established Limits of Authority.
- d) Authorisation and approval of the budget or operating plan do not equate to authorisation for financial expenditure. Approval for each expenditure is required, even if it is included in the budget.
- e) No employee is allowed to:
 - Approve their own claims or expenses for payment;
 - Approve a requisition, place an order, receive goods and approve an invoice for payment on their own; and
 - Divide the total value of a procurement into multiple purchase requisitions to circumvent the limits established by Key Senior Management.
- f) Business Unit Heads may delegate their limits of authority to their subordinates. Such delegation must be task-specific, and the Business Unit Heads remain accountable for the tasks delegated.
- g) Commitment by resigned Employees and Consultants:

- Employees who are serving notice of resignation, as well as consultants or part-time/temporary employees, are not permitted to make any commitments on behalf of the Group unless written permission is obtained.

11.0 COMMUNITY AND SOCIETY

11.1 SumiSaujana is committed to making a positive impact on society and contributing to the improvement of the quality of life in our community.

11.2 SumiSaujana and its employees shall be mindful of the impact of the Group's conduct on those around us. We will strive to conduct our business in a manner that benefits both the economy and society, and we will continue our efforts in fulfilling our corporate social responsibilities.

12.0 COMPLIANCE WITH THIS CODE

Individuals who violate this Code, regardless of position or title, may face disciplinary action, up to and including termination of employment. Examples of conduct that may result in disciplinary action include:

- Violating or instigating others to violate laws or this Code;
- Failing to report known or suspected violations of laws or this Code; and
- Retaliating against individuals for reporting concerns or violations.

13.0 GETTING HELP

13.1 Seek advice if you are uncertain about the appropriate legal or ethical course of action. Examples of when to seek advice include:

- When applicable policies are difficult to understand or interpret;
- When you have limited experience with the subject matter; and
- When differing opinions make the course of action unclear.

13.2 Choose the appropriate channel for seeking help based on the issue at hand. Start by consulting your immediate supervisor. If the issue remains unresolved, escalate it to your Business Unit Head or Key Senior Management.

14.0 REPORTING CONCERNS

14.1 You are encouraged to report any genuine concerns without fear of retaliation. SumiSaujana is committed to taking appropriate action against anyone who engages in retaliatory behaviour.

14.2 Reports can be made through the following dedicated reporting channels:

i. **Email:** compliance@sumisaujanagroup.com / armcchairman@sumisaujanagroup.com

ii. **Post:**
Legal & Compliance department / Chairman of ARMC
No. 57, Jalan TIAJ 2/1,
Taman Industri Alam Jaya,
42300 Puncak Alam, Selangor.

iii. **Phone:** Direct call to the Legal & Compliance department at +603 – 6038 8568

14.3 However, malicious or defamatory reporting, or the deliberate submission of false reports, constitutes a breach of this Code and may lead to disciplinary action.

15.0 REVIEW

This Code will be reviewed and/or updated at least once every three (3) years and/or when there are changes to the ACE Market Listing Requirements of Bursa Malaysia Securities Berhad, the Malaysian Code on Corporate Governance and/or any other applicable laws and regulations in effect, to ensure it remains relevant, appropriate, and consistent with the Group's practices and regulatory requirements. Any revisions to this Code will be submitted to the Board of the Company for consideration and approval.

This Code was reviewed, approved and adopted by the Board on 12 February 2025.