

KSL HOLDINGS BERHAD
Registration No. 200001008827 (511433-P)

CODE OF CONDUCT AND ETHICS FOR DIRECTORS

Introduction

The Code of conduct is intended to apply to every employees, customers and vendors of KSLHoldings Berhad (“KSL”) and its subsidiaries worldwide (“collectively, the Group”). Its establish standard to ensure that working environment and condition are safe and healthy, conflict of interest is avoided, workers are treated with respect and dignity, confidentiality is observed,good personal behaviour is exhibited and business operation are conducted ethically.

The fundamental in adopting the code is to ensure that all business activities are in full compliance with the laws, rules and regulations of the country in which it operate. If a law of the country conflicts with a rule or policy set out in this code, affected personnel should comply with the law. Besides, the code encourages affected personnel to go beyond legal compliance andadopt international recognized standard in order to advance business ethics and control.

The Group is open to receive input from stakeholders in the continue development and implementation of the Code of Conduct adopt the best practice where possible.

Our Value

We uphold the highest standards of integrity, transparency and accountability in the conduct of the group’s business and operations to ensure business sustainability. We are committed to conduct our affairs in an ethical, responsible and transparent manner.

- ❖ To Shareholder, we are committed to creating and enhancing long-term shareholder value
- ❖ To Employees, we will strive to recruit and retain the most competence people, offer them competitive terms and conditions of service, and maximize their personal progression through training and development. the Group is committed to provide to all employees a safe, secure, healthy and conducive workplace culture and environment, where the values and mutual and reciprocal respect, trust and confidence and upheldand activities promoted

- ❖ To Customers, we strive to provide products and services that meet their expectation through continuous engagement
- ❖ To Business Partners, we will uphold highest professional and ethical relationship for mutual benefit with our suppliers, contractors, service providers, financial institutions and the entity doing business with us
- ❖ To Government, we undertake to comply with all applicable laws and regulations laid down and to participate in project promulgated by government for industry and social development
- ❖ We pledge that we will be a responsible corporate citizen to conduct our business in economic, environment and social sustainable manner wherever it operates and will take into consideration the needs and aspiration of local communities

I. Respecting Others

1) Unlawful Discrimination

We do not tolerate unlawful discrimination in the workplace or on the job. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, or marital status in hiring and employment practices such as promotions, rewards, and access to training.

2) Working hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Workweeks and working hours are not to exceed the maximum set by statutory labor law.

3) Wages and Benefits

To offer pay and benefits that is fair and competitive within each local business and industrial markets we are participating. Compensation paid to workers shall comply with all applicable laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

4) Humane Treatment

There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment.

5) Communication

We promote continuous two-way communication with our employee to ensure ideas, concern and problems being identified and resolved amicably as a team

6) Continuous Development

We strive to identify and satisfy the needs of employees to continuously develop their knowledge, skills and competency for personal development and corporate excellence.

II. Serve Our Customers

1) Integrity

Our reputation that our customers can trust for the products and services provided by us is our most valuable asset, and it is the responsibility of all of us, including our business partners, to make sure that we continually earn that trust. We strive to delivery our products and services with competitive value and quality in equilibrium. The Directors and employees shall exhibit good working attitude, behaviour, courtesy, honesty and professionalism at all times during the course of performing their duties and tasks. In performing their duties, due care and diligence must be exercised.

2) Competency

We seek to only serve our customers whom we are competence to serve, who value our products and services and who meet appropriate standard of legitimacy and integrity.

3) Punctuality and good time management

The Directors and employees shall accept task assigned to them and perform their duty within the given time frame and ensure delivery of result on time.

4) Assets

It is our commitment that all assets belonging to our clients, including intangible, intellectual properties and electronic assets, in a manner both responsible and appropriate to our business and only for legal and authorized purposes. Such assets should not be used for personal gain and enjoyment.

III. Avoiding Conflict of Interest

A conflict of interest arises in any situation in which an individual is in a position to take advantage of his or her role at the Group for his or her personal benefit, including the benefit of his or her family and friends. A conflict of interest can make it difficult for an individual to fulfill his or her duties impartially and correctly. A conflict of interest can exist even if it results in no unethical or improper acts. Even the appearance of improper influence in decision-making may be an issue. A conflict of interest will undermine the values of good faith, fidelity, diligence and integrity in the performance of duties and obligations as expected.

All employees, customers and business partners must therefore try to avoid conflicts of interest in the conduct of business.

1) Business Integrity

The highest standards of integrity are to be upheld in all business interactions. Affected personnel shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes). All business dealings should be transparently performed and accurately reflected on records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws and best practices.

2) No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted. Gifts/benefit other than of token value (any amount below RM500) should generally be refused.

3) Disclosure of Information

Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain is unacceptable.

4) Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld. Appropriate means to safeguard customer information must be available.

IV. Preserve Confidentiality and Privacy

Unable to preserve confidentiality will eliminate our competitive advantage, promote unethical business practice and prove costly in other ways. Therefore, upholding highest standard in the preserving confidentiality is one of our responsibilities and extended to ensuring employees, customers and business partners receives such information on “need to know” basis and to observe the confidentiality and privacy of such information. Compliance with relevant privacy law in jurisdictions we are operating is critical.

We respect the confidentiality and privacy of our employees, customers, business partners and regulatory bodies with whom we do business and liaise with. Unless authorized, we do not use confidential information for use not authorized by data subject, for our sole benefit or to benefit a third party with detrimental effect to the owners. We disclose confidential information or personal data only when necessary, and when appropriate level of approval or authorization to be so has been obtained from competing party, and/or compelled to do so by legal and regulatory requirements.

V. Safety and Health

We undertake to ensure the working environment at our operating entities are being maintained safely, healthy and environmental friendly for our human capital, customers and business partners. The Group will use its best endeavours to ensure a safe workplace and maintain proper occupational health and safety practices to commensurate with the nature of the Group’s businesses and activities. Such a commitment in return requires that all Directors and Employees understand and abide by the Group’s policies and procedures.

VI. Sustainable Business Practices

- ❖ We commit our acts in economic, environment and social sustainable manner and within the laws, customs and traditions of the countries we operate and contribute in a responsible manner to the development of communities
- ❖ We aspire to act in a manner that minimises the detrimental environmental impacts of our business operations
- ❖ We continuously support charities, educational and community service activities.

VII. Consequences and Channel to Report

Any failure to comply with the code of conduct may result in disciplinary action, including the possibility of dismissal and, if warranted, legal proceedings or criminal sanctions.

The Directors and employees shall report any practices or actions believed to be inappropriate under this code to their superior and the Human Resource Manager. If it is appropriate and for customers and business partners, in view of nature of the reported matter, reports of violations may be made directly to the higher levels including the Executive Chairman and Group Managing Director or whistle blow or report the concerns, in confidence through Whistle Blowing Policy which is available on the Company's website.

All genuine complaints shall be properly investigated, and no individual shall be retaliated or incriminated for making such reports in good faith.

VIII. Policy Review and Approval

This Policy is reviewed by the Audit Committee and recommended to the Board of Directors for approval on 28/02/2018. The Audit Committee to review and monitor this Code of Conduct regularly to ensure its remain relevant and appropriate and to report of the same to the Board of Directors for approval.

Reviewed on 28/08/2025