

KERJAYA PROSPEK PROPERTY BERHAD

Registration No. 199401001358 (287036-X)

CODE OF ETHICS

Introduction

The Group always believes employees hard work, high productivity and discipline are qualities to be respected. All Employees must prevent any conflict of interest in all matters affecting the Group. Integrity, self-respect, transparency and mutual trust among employees are part of the team spirit required to achieve the Group's goal.

Code of Ethics

1. Conflict of Interest

A conflict between the employee's interests and interests of the Group is a conflict of interest. i.e allow his private interest to come into conflict with his duties to the company or misuse his position as an officer of the Company to his private advantage.

All employees must prevent any conflicts of interest with the Group and avoid financial interest with competitors, client or supplier outside of its authorised business conduct.

Any interest that involves, or may reasonably be expected to involve, would cause a conflict of interest with the Group should be disclosed immediately.

2. Corruption is strictly prohibited

Directors and Employees are not to use their personal power that might be associated with or construed as bribery or corruption. They must comply all provisions of the Malaysia Anti-Corruption Commission Act (MACC) 2009 accordingly.

3. No gift Policies

Directors and Employees shall not to accept any form of gifts that might result a conflict of interest and influence business decision or for their own benefits. If in doubt, before accepting any gifts, please consult with your respective Head of Department or approval relating to accepting of gifts.

4. Compliance with laws, rules and regulations

The Group must comply with all applicable law, rules and regulations, by law and regulatory requirements the Group operates and presented and impose by the Government from time to time. Officers are expected to understand and comply with the laws, rules and regulations that are applicable to their positions and/or work, including the Anti-Money Laundering and Anti-Terrorism Financing Act 2001 and the Malaysian Anti-Corruption Commission Act 2009 (and its amendments in 2018).

5. Working Place

All employees:

- (a) Should build a good environment in their work place and always observe and comply to the Safety and Health rules and regulations.
- (b) Should avoid any form of harassment and violence. Any employee who believes he/she has been subjected to harassment should lodge a report to HR Department.
- (c) Should be honest at all times and shall not conduct himself in such a manner as to lay himself open to suspicion and dishonesty.
- (d) Should offer equal opportunity to all employees in term of recognition, progression and career path, irrespective of their origin or beliefs and do not tolerate any discrimination or harassment of any kind.

6. Confidentiality and non-disclosure

Employees should maintain the confidentiality of information entrusted to them by the Group and any other confidential about the Group that comes to them, from whatever source, in their capacity as an employee. Unless required by law or authorised by the Group, Employees shall not disclose confidential information or allow such disclosure or use confidential information for unauthorised purposes. This obligation continues beyond the termination of employment. The obligation to preserve confidential information also applies to information received from customers or business partners of the Group, its continues even after the employment ends.

7. Data protection and information

Employees should comply with the Employer's Personal Data Protection Policy, Information Technology Policy and Document Management Policy. Employees shall record, manage, store and transfer all data and records in compliance with applicable legal, tax, regulatory and accounting requirements. Some of which are specific to a particular business operations or functions. Employees are responsible to retain and store proper records in compliance with company policy, legal and regulatory requirements.

8. Protection of Assets and Resources

All Employees are responsible for the proper use of the Group's assets and resources and endeavour to protect against any deterioration, alteration, fraud, loss and theft.

9. Independence

Employees have the obligation to act in the best interest of the Group at all times. Employees are prohibited from using their position or knowledge gained directly or indirectly in the course of their duties and responsibilities or employment for private or personal advantage.

10. Human Rights

The Group supports and respects human rights. The Group treats officers with dignity and respect in the workplace, provides equal employment opportunities, creates a safe and harmonious work environment, and will not engage in any form of discrimination. Officers should respect the personal dignity, privacy and rights of each individual they interact with during the course of work and shall not in any way cause or contribute to the violation or circumvention of human rights.

11. Insider Dealing

Officers are prohibited to trade in the Company's securities affected by or on behalf of a person with knowledge of relevant but non-public material information regarding the Group.

Any person who commits insider trading, he/she may be subjected to certain criminal and civil actions under Malaysian Law which includes Capital Markets and Services Act 2007.

Approved on 26 May 2023.