

CODE OF CONDUCT AND ETHICS

1. INTRODUCTION

- 1.1 Guidance 3.1 of the Malaysian Code on Corporate Governance (“**MCCG**”) stipulates that the Board of Directors (“**Board**”) of Parkland Sdn Bhd (“**Parkland**” or the “**Company**”) has the responsibility to set the tone and standards of the Company through the Code of Conduct and Ethics (“**Code**”).
- 1.2 The Code sets out the standards in which the Company and its subsidiaries (“**Parkland Group**” or the “**Group**”), its directors and employees (including senior managers, managers, executives, non-executives, workers, and employees, whether full time, part time, probationary, contract or temporary) are required to comply in discharging their duties at all times. The Code sets out the minimum standards of conduct and personal behaviour which are set to be adhered to in order to promote and maintain a uniform ethical conduct within the Group as set out below.
- 1.3 This Code should be read in conjunction with our Whistleblowing Policy.

2. CONFLICT OF INTEREST

- 2.1 Employee must not place himself/ herself in a situation in which he/ she has or appears to have a direct or indirect interest in connection with or benefit from an improper gain or advantage outside commercial activities, where such gain or advantage adversely affects the Group’s interest.
- 2.2 The circumstances in which such a conflict may be present include:
 - (i) Ownership, directly or indirectly of a material interest in any competitor, supplier, contractor, sub-contractor, customer, person or organisation doing business with the Group or its affiliates;
 - (ii) Acting in any capacity including as a director, shareholder in a private limited company, officer, partner, consultant, employee, distributor, agent or the like for a competitor, supplier, contractor, sub-contractor, customer, person or organisation doing business with the Group or its affiliates;
 - (iii) Accepting directly or indirectly, payments, services or loans, from competitor, supplier, contractor, customer, person or organization doing business with or expecting to do business with the Group or its affiliates;
 - (iv) Receiving gifts other forms of ‘gratitude’ of more than nominal value are deemed to constitute ‘payments’. This shall exclude loans from insurance companies, commercial and saving banks at normal rate of interest; and
 - (v) Having business interests, which result in personal gain at the expense of one of the Group or its affiliates, inhibiting an impartial business judgment or creating a questionable public image. These should voluntarily be declared by all employees without exception.

- 2.3 Directors should notify in writing immediately to the Board where he is a director and an employee should notify his reporting superior or division head (as the case maybe) in writing immediately upon becoming aware of a conflict, whether real or perceived, either involving himself, other employees or a third party.
- 2.4 Employees are advised to consult the Human Resource (“**HR**”) Department if they are uncertain about a situation of potential conflict of interest.

3. ANTI-BRIBERY AND CORRUPTION

- 3.1 All employees of the Group are required to adhere to the Anti-Bribery and Corruption (“**ABC**”) Policy which clearly sets out the Group’s policies in various matters that relate to bribery and corruption. Refer to the ABC Policy of the Group.
- 3.2 All employees shall refrain from offering, promising, giving, demanding or receiving anything of value to anyone in the form of bribes, kickbacks and/or any other improper gratification (including gifts, hospitality and entertainment) to improperly influence the outcome of any transaction, whether it is for their own benefit or for the benefit of the Group.
- 3.3 Where provisions in this Code are in conflict or inconsistent with any applicable laws or the Group’s policy, the stricter provisions shall prevail. In case of uncertainty, kindly seek help and clarification before taking action.

4. NO ABUSE OF AUTHORITY OR POWER

The abuse of authority or power is the improper use of a position of influence, power or authority by an individual towards others, in particular where the alleged offender imposes the will over a subordinate, through the exercising of the power conferred by the position of the superior for gaining benefits or particular objective that is usually in violation of laws, rules and regulations. All the Officers must demonstrate respect in their interactions with other Officers, in particular subordinates and contractors.

5. INSIDER TRADING

Any employee of the Group who is in possession of market sensitive information is prohibited from trading in the securities of the Group if that information has not been made public. This prohibition extends to any act of disclosing the insider information to another person, including family members and friends, if the employee knows or reasonably knows that the other person would make a trade in reliance on that information, even if the employee does not derive any direct economic benefit from the trade.

Employees are encouraged to consult with his / her direct superior if they are uncertain of the status and nature of the information they possess.

6. ANTI-MONEY LAUNDERING

“Money laundering” is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate. The employees shall to the best of their ability and knowledge conduct business with reputable customers with legitimate funds, for legitimate business

purposes.

7. TRADE SECRETS AND CONFIDENTIAL INFORMATION

Employees shall not, either during his/ her services with the Company or after leaving the services of the Company for whatever reason, disclose to any person whatsoever any information relating to the Company or its customers or any trade secrets of which with the company, the employee shall acquire or possess whilst in the service with the Company, save that he/ she is required under or compelled by any law, statutes, regulation and/or any court order enforcement in Malaysia.

8. RESPONSIBILITY TO REPORT

Employees are required to promptly alert their supervisor or higher management of business and work-related situations that could be damaging to the Company or cause harm to others; and to take reasonable action to prevent damage or harm. Employees could be in breach of the Code or HR Policies Manual if they assist or authorise others in activities that breach the Code or HR Policies Manual or conceal or fail to report any known or suspected breaches by others. Employees and Third Parties may also have a duty to report corruption to the government authorities if required to do so by local regulations.

9. PROTECTION

Persons making genuine and appropriate complaints under this policy are assured of fair treatment. In addition, the Group's employees are also assured of protection against unfair dismissal, victimisation or unwarranted disciplinary action, even if the concerns raised turned out to be unsubstantiated. The Group reserves the right to take appropriate actions against anyone (i.e., employees or third parties) who initiates or threatens to initiate retaliation against those who have raised concerns under this policy. In particular, employees who initiate or threaten retaliation will be subject to disciplinary actions under the HR Policies Manual, which may include summary dismissal. Management will support all employees and encourage them to raise concerns without fear of reprisals.

10. CONFIDENTIALITY

It is pertinent that directors and all employees exercise caution and due care to safeguard any information of confidential and sensitive nature relating to the Group during their course of duties. Directors and employees must not disclose official or confidential information to others or third parties, unless proper authorisation is given or legally mandated. Confidential information received by each director in the course of the exercise of directorial duties shall be kept confidential and will not be disclosed or released to any person other than Board members, except as required by law or as agreed by the Board.

11. ENVIRONMENT, SOCIAL AND GOVERNANCE ("ESG") AGENDA

The Company would do everything possible to ensure that the activities and the operations of the Company and the Group benefits the ESG Agenda and do not harm the interest and well-being of environment and society at large. The Company adopts an objective and positive attitude and give the utmost cooperation for the common

good when dealing with government authorities or regulatory bodies. The Company would do everything possible to ensure the effective use of natural resources, and improve quality of life by promoting corporate social responsibilities. In addition, the Company would do everything possible be more proactive to the needs of the community and to assist in society related programmes in line with the aspirations of the concept of 'caring society'.

12. TYPES OF MISCONDUCT, MALPRACTICE AND IRREGULARITY

It is not possible to give an exhaustive list of the activities that constitute misconduct, malpractice or irregularity covered by this policy. For example, the Group expects all employees to observe and apply the Code principles in the conduct of the Group's business. Employee behaviour that is not in line with Code principles could constitute a misconduct, malpractice, or irregularity that should be reported.

The principles of Code relate to but not limited to:

- abide by professional ethics and business integrity;
- avoiding conflicts of interest;
- no bribery;
- compliance with laws and regulations;
- abiding by our Company's policies and procedures;
- compliance with financial controls and reporting requirements;
- protecting our information, records and assets;
- prompt response to incidents and obligation to notify; and
- prohibition of sexual harassment.

13. PUBLICATION ON THE COMPANY'S CORPORATE WEBSITE

In compliance with Practice 3.1 of the MCCG, a copy of this Code is published on the Company's corporate website.

14. REVIEW AND UPDATE

This Code will be reviewed periodically by the Company, updated and approved by its Board as and when necessary to ensure that it remains current and relevant in addressing any ethical issues that may arise within the Group.

This Policy is approved by Chief Executive Officer and shall take effect on 01/03/2026.

History

Version Number	Effective Date
1	01/03/2026