

AMANAHRAYA CODE OF BUSINESS ETHICS FOR EMPLOYEES

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Group Compliance, Integrity and Governance
Department

AMANAHRAYA

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CODE OF BUSINESS ETHICS FOR EMPLOYEES



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1. INTRODUCTION

1.1 Key Belief

The Company strongly believes that uncompromised integrity and strong moral and social values will convey a strong corporate image to all our stakeholders in the pursuit to strengthen our market presence.

Uncompromising integrity means staying true to what we believe in, and not finding ways to manipulate any ambiguity or uncertainty in the law or Company's policies and procedures, should there be any. We stand firm on honesty, fairness and doing the right thing even though in complex circumstances.

Strong moral and social values mean we uphold and adhere to the concept of treating ourselves with high dignity, respect, and friendliness towards others in our way of life and business dealings.

Each of us is highly expected to demonstrate these key beliefs in our work as AmanahRaya employees.

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1.2 Objective of the Code of Business Ethics for Employees

The objective for developing AmanahRaya Code of Business Ethics for Employees (referred to as the "Code") is to support AmanahRaya's Vision and the 5 Core Values we uphold in AmanahRaya. This Code serves to outline to the whole organization member the acceptable and unacceptable business conducts.

Being a Government Owned Company (GOC) to establish a Group Compliance, Integrity & Governance Department would also be of an important aspect to develop the Code to support and guide towards recognizing and resolving ethical issues that we may encounter in conducting AmanahRaya's daily operation.

Everyone to whom this Code applies, must comply with all applicable laws and are responsible for being familiar with them and the contents of this Code.

1.3 Responsibility, Compliance and Accountability

As one of the conditions of employment with AmanahRaya, all employees must accept the responsibility of complying with the policies set forth in this Code. Any violations of these policies will be subject to disciplinary action, including suspension or termination of employment with cause, or other appropriate legal actions if applicable.

This Code is not intended to and does not create a contract of employment between the employees and AmanahRaya, nor does it guarantee that employees' employment with AmanahRaya will continue as long as they comply with its policies.

Employees who are facing a potential conflict, or who are aware of a violation of this policy should, as a first step, report it to the Management. The Management may obtain advice from the Head, Group Compliance, Integrity & Governance Department on whether a conflict of interest exists.

There will be no reprisal against employees for making such report in good faith. Likewise, it is unacceptable to make a complaint or file a report knowing it to be false. The identity of the employee who discloses such information will be kept confidential, except in cases where such disclosure is necessary for the purpose of conducting investigation(s).

1.4 Additional Responsibility for Managers

AmanahRaya's managers are expected to lead according to our standards of ethical conduct, in both words and actions. Managers are responsible for promoting open and honest two-way communication.

Managers must be positive activists and role models who show respect and consideration for each of our associates. Managers must diligently look for indications of unethical or illegal conduct, if there is any, and report it to the Head, Group Compliance, Integrity & Governance Department immediately.

2. DEFINITIONS

2.1 Assets

Assets are tangible or intangible resources controlled by the Company which derive from past transactions or events and from which future economic benefits are expected to flow to the Company.

2.2 Ethics

It refers to standards of conduct, which indicate how to behave, based on moral duties and virtues arising from principles of right and wrong. Ethics involves two aspects, namely the ability to distinguish right from wrong and the commitment to do what is right.

2.3 Business Courtesy

A business courtesy is a gift or favor from a person or an organization, regardless of whether a business relationship exists between AmanahRaya and that person or organization, for which fair market value is not paid by the recipient that includes tangible or intangible benefit such as non-monetary gifts, meals, drinks, entertainment, recreation, prizes, transportation, discounts, tickets, passes, promotional items or use of donor's time, material or equipment.

2.4 Code

A set of rules aimed at governing the business conduct and relations of AmanahRaya's employees, suppliers, contractors, agents, and consultants.

2.5 The Company / AmanahRaya

The Company / AmanahRaya shall mean Amanah Raya Berhad and its subsidiaries.

2.6 Competitors

Competitors are persons or entities that render the same or very similar services or supply the same or similar products in any one or a number of our business environments.

2.7 Conflict of Interest

A conflict of interest arises when employees have a personal interest that could be seen to have the potential to interfere with their objectivity in performing their duties or exercising their judgment on behalf of AmanahRaya.

2.8 Clients

Clients are persons or entities to which AmanahRaya provides products and render services that may include potential customers, suppliers, or competitors.

2.9 Employees

Employees shall encompass all personnel including top management, senior managers, managers, executives, and non-executives under the employment of AmanahRaya and its subsidiaries.

2.10 Facilitation Payments

Facilitation payment commonly known as "facilitating", "speed" or "grease" payments are payments made to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has an interest.

2.11 Family or Families

Shall have the same meaning given to the definition of "relative" in relation to an employee under Section 3 of the Malaysian Anti-Corruption Commission (MACC) Act 2009.

2.12 Gratification

Gratification shall have the same meaning as defined in Section 3 of the Malaysian Anti-Corruption Commission Act 2009 (Act 694).

2.13 Legal Department

Legal Department shall mean the Group Legal Department of Amanah Raya Berhad.

2.14 Management

Management shall cover all levels of officer holding the managerial post of M3 and above.

2.15 Proprietary Information

Proprietary information is information held by a person or entity concerning the know-how, trade secrets or other information of any kind, whether in printed or electronic format, including but not limited to intellectual property rights, technical information, business processes, sale forecasts, marketing strategies, customer lists or potential customer information, financial records or operations which is regarded as being confidential in nature (whether or not labeled as confidential) and belongs to and owned by AmanahRaya.

2.16 Sexual Harassment



Sexual harassment shall mean any unwanted conduct of sexual nature having the effect of verbal, non-verbal, visual, psychological, or physical harassment that might, on reasonable grounds, be perceived by the recipient as placing a condition of a sexual nature on his or her employment or as an offence or humiliation or threat to his/her well-being but has no direct link to his/her employment.

2.17 Subsidiary Company

Subsidiary company is a company or enterprise in which the investor company (known as the parent) has the power to exercise control over the financial and operating policies of the subsidiary company so as to obtain benefits from its activities and as defined under Section 4, Companies Act 2016 (Act 777).

2.18 Suppliers

Suppliers are persons or entities that provide products and render services of any nature to AmanahRaya.

3. OUR RESPONSIBILITY TO AMANAHRAYA'S EMPLOYEES

We respect the well-being of every employee.

3.1 Constant Respect

We will treat each other with respect and fairness at all times, just as we wish to be treated ourselves. We will value the difference of diverse individuals from all around Malaysia.

Employment decisions must be based on business reasons, such as qualifications, talents, and achievements, and will comply with local and national employment laws.

3.2 Discrimination

We do not tolerate any form of discrimination in the workplace. As an equal opportunity employer, it is our policy to provide equal opportunities for all applicants and employees and to recruit, hire, transfer, promote, train, and administer all personnel policies regardless of race, color, religion, national origin, gender, age, marital status, disability, or veteran status.

Employees are encouraged to make a report to the disciplinary committee according to the standard reporting procedures if they feel they have been discriminately treated.

3.3 Harassment

We prohibit any form of harassment by or toward employees, contractors, suppliers, or customers. Forms of harassment may include, but are not limited to, unwelcome verbal or physical advances and sexually, racially, or otherwise derogatory or discriminatory materials, statements, or remarks. As such, all employees including supervisors and managers will be subject to disciplinary action up to and including termination for any proven act of harassment.

Employees are encouraged to report any harassment in the workplace and complaints will be promptly and thoroughly investigated. The Company will treat such complaints as confidentially as possible, releasing information only to those with a need or right to know.

3.4 Drugs, alcohol, and prohibited substance

All employees should report to work in excellent condition to perform their duties, free from the influence of alcohol or illegal drugs. The possession, use, and trafficking of illegal drugs by AmanahRaya's employees is a serious offence and would be brought to the law.

Employees suspected to be under the influence of drugs, alcohol, or prohibited substances shall be required to undertake a special test at authorized company clinics or designated government clinics or hospitals.

Positive test result or refusal to comply with the required test of Company's medical procedures is grounds for disciplinary action including termination.

3.5 Threats and Violence

Threats or acts of violence, psychological, or physical intimidation are prohibited. Any employee who has any knowledge or prohibited conduct or has concerns regarding his/her safety or the safety of colleagues, clients, or suppliers must immediately report the matters to the Head, Group Compliance, Integrity & Governance Department as described in the whistle-blowing policy.

3.6 Safety and Health

AmanahRaya strives to provide each employee with a safe and healthy work environment. As such, each employee must assist in maintaining a safe and healthy workplace for all employees by following safety and health rules and practices and by reporting any

accidents, injuries and unsafe equipment, practices, or conditions to the Management.

4. OUR RESPONSIBILITY TO AMANAHRAYA'S CLIENTS

We respect the well-being of every employee.

4.1 Quality Products and Services

Living up to AmanahRaya's high reputation in the market, it is important that quality products and services are delivered in accordance with the procedures in place. Failing to deliver according to the standards will damage AmanahRaya's reputation to the public.

Prior to the sale of products, accurate and sufficient information about the product and services should be furnished so that clients can make an informed purchasing decision.

We must at all times strive to exceed clients' expectations in delivering our products and services. It must meet our performance, efficiency, and courtesy standards.

4.2 Confidentiality of Clients' Information

AmanahRaya is a custodian of sensitive personal information and confidential business information. Therefore, protecting confidential information is an employee's prominent responsibility.

All employees must maintain the sanctity of confidential information entrusted to them by AmanahRaya, its subsidiaries, suppliers, clients, or others with whom the Company conducts business. No information can be transferred, flowed out, or communicated within internal parties prior to having an authorization and urgency to know. Furthermore, employees are strictly prohibited from using such information for their own (or any third party's) profit or advantage.

Employees may disclose confidential information when

disclosure is authorized by the Management or required by law (Personal Data Protection Act [PDPA]), regulations, or legal proceedings. Confidential information generally includes non-public information that might be useful to competitors or others, or harmful to the owner of the information if disclosed. Employees' obligation to preserve confidential information continues even after their employment ends.

Employees should consult the Legal Department if they believe they may have a legal obligation to disclose confidential information.

All employees must at all times protect the confidentiality of information by accessing sensitive information only when it is necessary for the performance of their duties. AmanahRaya applies high security and privacy best practices to safeguard clients' business information that is in its custody or control.

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The importance of maintaining the security of sensitive information is not just a best practice; it is an obligation that all employees must be vigilant about. Knowing how to handle information effectively protects the rights of the clients and ensures that the Company meets its duties and obligations.

4.3 Business Dress and Attire

Employees must ensure that when they have direct contact with the clients, they are not to be dressed in such a manner or wear clothing that may offend the clients or compromise health and safety standards.

Wherever the company provides uniform or special attire, such employees must abide by the requirement. Employees are required to adhere to the Dress Code as enforced.

5. OUR RESPONSIBILITY TO AMANAHRAYA'S BUSINESS PARTNERS

Building a win-win situation with our business partners gives us important competitive edge.

5.1 Business and Personal Relationship with Business Partner

As the representative of AmanahRaya to the outside world, employees must act responsibly and in a manner that will reflect favorably on the Company and each employee as individuals. All employees are obliged to carry out their assignments guided by the principles set forth in AmanahRaya's vision and values and in compliance with this Code and our corporate policies.

When it is necessary to engage the services of an individual or firm to consult for or represent AmanahRaya, employees must avoid the intent and appearance of unethical or compromising conduct in relationships, actions, and communication with them. Examples may include choosing a business meeting location other than AmanahRaya's offices, which might give the impression of impropriety.

AmanahRaya will enter into representation or supplier agreements only with individuals or organizations believed to have a record of and commitment to integrity. AmanahRaya's representative securing the supplier's agreement must ensure suppliers', agents', consultants', independent contractors, and representatives are aware of this Code and their obligations under it.

Employees who may have a personal relationship with a vendor, supplier, consultant or business partner contracted to AmanahRaya must adhere to the principles of this policy, keeping their personal relationships separate and apart from their respective AmanahRaya interests.

AmanahRaya will inform all vendors, suppliers, consultants, and business partners of their responsibility to act on behalf of their company consistent with the Code and other relevant AmanahRaya policies.

5.2 Purchasing Practices

AmanahRaya will only make purchases based on total cost, service, quality, and proficiency. All purchasing commitments of any form, verbal, written orders, letters of intent or contracts must be processed according to the relevant

procedures. Purchase requisitions issued after the fact that suppliers have already begun supplying the company with Goods and/or Services before obtaining the appropriate approvals are considered a violation of this policy.

Business units or individuals that are planning to purchase goods or services must involve strategic procurement early in the sourcing process to facilitate the supplier selection and qualification process and to conduct negotiations for the specific purchase.

All employees are expected to comply with the policies related to expenditures for Goods and/or Services and the related procedures and guidelines.

All purchasing documents must be documented and clearly identify the services or products to be provided, which is the basis for earning payment and the applicable rate or fee. The amount of payment must commensurate with the services or products provided.

5.3 Gratification

Any supplier shall not offer and/or give to any employee of AmanahRaya any gratification as an inducement or reward for the employee to use his or her office or position when he or she makes any decision or takes any actions in relation to any matter in which the supplier, relatives, or associate of his or hers has an interest whether directly or indirectly.

In an event that an employee corruptly solicits or obtained or has made any attempt to obtain such gratification for himself or herself or for any other person, the supplier shall, at the earliest opportunity thereafter, report such soliciting or obtaining of, or attempt to obtain the gratification together with the full and true description and, if known, the name of the person who solicited, or obtained or attempted to obtain gratification, to the Head, Group Compliance, Integrity & Governance Department.

Similarly, in the event that an employee to whom any form of gratification is given, promised or offered, in contravention with any provision of the Malaysian Anti-Corruption

Commission Act 2009 (Act 694) shall report such gift, promise or offer together with the name, if known, of the person who gave, promised, or offered such gratification to him or her to the Head, Group Compliance, Integrity & Governance Department.

5.4 Suppliers and Business Partners Commitment to Business Ethics

AmanahRaya expects that all its suppliers and business partners share to the common business ethics principles and policies as prescribed in this Code.

Any suppliers or business partners found to conduct unethical practices or violate the law shall not be tolerated and may be blacklisted, and their contracts or dealings may be terminated by AmanahRaya.

Employees who may have a personal relationship with a vendor, supplier, consultant, or business partner contracted to AmanahRaya will adhere to the principles of this policy, keeping their personal relationships separate and apart from their respective AmanahRaya interests.

AmanahRaya will inform all vendors, suppliers, consultants, and business partners of their responsibility to act on behalf of AmanahRaya consistent with the Code and other relevant AmanahRaya policies.

6. OUR RESPONSIBILITY TO SHAREHOLDERS

We value and are thankful to the commitment and dedication entrusted to us by the shareholders.

6.1 Protecting AmanahRaya's Assets

All employees shall undertake to protect the assets and property of AmanahRaya and its subsidiaries and ensure their efficient use. Theft, carelessness, and waste have a direct impact on profitability. Any suspected incident of fraud or theft affecting AmanahRaya should be reported immediately.

Employees' obligation to protect the assets and property of AmanahRaya and its subsidiaries includes the proprietary information, including intellectual property, such as trade secrets, patents, trademarks and copyrights, and business, marketing and strategic plans, designs, databases, records, salary information and any unpublished financial data and reports. All employees may not use or distribute this information without proper authorization.

All employees should not use AmanahRaya's assets for non-company business. Employees must not use AmanahRaya's assets or property in furtherance of any unlawful purpose or immoral purposes.

6.2 Use of Electronic Tools

The Company owns the copyright in all works created by its employees in the course of their employment in the absence of any agreement to the contrary. As the owner of copyright in such works, the Company has all of the exclusive rights associated with ownership, including the exclusive right to give or withhold permission to do certain acts in relation to the works.

Employee is individually responsible for the protection of AmanahRaya assets and systems assigned to or made available to them. Misuse, misappropriation of or theft of company assets such as software, computers, peripherals, the internet, intranet, and email systems or any other owned by AmanahRaya is absolutely prohibited.

6.3 Complete, Accurate and Timely Disclosure

As a Government Owned Company, AmanahRaya is required to make various disclosures to the public, including by filing regular reports with the Ministry of Finance, Securities Commission, Malaysian Anti-Corruption Commission and the Legal Affairs Division, Prime Minister's Department. AmanahRaya is committed to fully comply with these important obligations and we seek to provide full, fair, accurate, timely and understandable disclosure in our reports, press releases and other public communications.

To assist in this endeavor, AmanahRaya maintains disclosure controls and procedures, including internal financial controls, under which it may be requested to provide information or otherwise participate in the financial accounting and disclosure process. If any employee participates in this process, they have a responsibility to provide information and disclosures in a timely manner and to assure that the information and disclosures they provide are complete, accurate and understandable.

All employees shall never make a materially false or misleading statement or withhold any material information or assist others in doing so.

6.4 Business Expenses & Financial Accountability

Employees must ensure that the financial, accounting, and other reports and records of AmanahRaya are accurately and fairly reflect the transactions and financial condition of the Company in reasonable details, and in accordance with generally accepted accounting principles, practices, procedures, and legal requirements. No one may authorize payment knowing that any part of the payment will be used for any purpose other than what is described in documents supporting the payment.

Employee may not create or participate in the creation of records that are misleading or artificial. No unrecorded or "off the books" funds or assets are to be maintained except where the Group Managing Director has determined that they are required or permitted under applicable laws and regulations.

Every employee must exercise integrity, prudence, and good judgment when they incur and approve business expenses. Expenses must be reasonable and necessary for business reasons.

Expenses incurred in the performance of AmanahRaya business will be reimbursed in accordance with the Financial & Accounting Policies, through the filing of claims, which must be documented accurately and completely.

6.5 Recording and Retaining Business Communications

All business records and communications should be clear, truthful, and accurate. Business records and communications often become public through litigation, government investigations and media coverage. We will avoid exaggeration, colorful language, guesswork, legal conclusions, and derogatory remarks or characterizations of people and companies. This applies to communications of all kinds, including e-mail, any social media platforms, and informal notes or memos. Records must be retained and destroyed according to AmanahRaya record-retention policies.

7. OUR RESPONSIBILITY TO COMPETITORS

We compete aggressively and with integrity.

7.1 Competitive Information

AmanahRaya seeks to remain competitive by operating fairly and honestly. The Company seeks competitive advantages through superior performance, never through unethical or illegal business practices.

AmanahRaya does not permit or condone any conspiracy of improper taking or use of proprietary information of others, possessing trade secret information that was obtained without the owner’s consent, or inducing such disclosures by past or present employees of other companies.

All employees should endeavor to deal fairly with our clients, suppliers, competitors, and employees and must not attempt to take unfair advantage of anyone through manipulation, concealment, abuse of privileged or confidential information, misrepresentation, or any other intentional unfair-dealing practice.

If information is obtained by mistake that may constitute a trade secret or confidential information of another business, or if employees have questions about the legality of information gathering, they should consult the Legal Department.

8. OUR RESPONSIBILITY TO COMMUNITIES

Through community we gained, and to them we grant.

8.1 Community Service

AmanahRaya serves society by providing services at a competitive price, and by actively supporting the communities in which we operate. AmanahRaya’s employees throughout Malaysia are encouraged to give support to worthwhile community programs as long as they do not affect his office duty.

8.2 Personal Community Activities

AmanahRaya’s employees are free to support any community, charity, and related organizations, as long as they make it clear that their views and actions are not those of AmanahRaya’s. Employees’ outside activities must not interfere with their job performance at work.

No employee may pressure another employee to express a view that is contrary to a personal belief, or to contribute to or support political, religious, or charitable causes.

8.3 Communicating with External Audiences

All employees must ensure that they provide fair, accurate, timely, and easy to understand information when they are representing AmanahRaya to the public.

To ensure professional and consistent handling, requests from the media should be forwarded to the Group Communication Department. On the other hand, requests for financial data from financial analysts, the shareholders, and other parties other than our clients must be forwarded to the Group Financial Services Department.

9. OUR RESPONSIBILITY TO THE GOVERNMENT

We conduct businesses that strongly oblige to the law of the government.

9.1 Conduct Businesses in Compliance with the Law

Abiding the law, both in letter and in spirit, is the foundation on which AmanahRaya’s ethical standards are built. All employees should respect and abide the laws, rules, and regulations of Malaysia. Although not all of us are expected to know the details of these laws, it is important that we know enough to determine when to seek advice from our supervisors, managers, or others.

The Head, Group Compliance, Integrity & Governance Department is available to all employees who have any questions about the details of laws and regulations applicable to them. One thing that should be noted is that, if a law conflicts with a policy in this Code, then the law takes precedence over this Code.

9.2 Political Activities

Employee who aspires to hold any key position of significant influence or as office bearer in any political parties must disclose and obtain written approval from the Management in order to hold such post.

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10. CONFLICT OF INTEREST

We act in the best interest of AmanahRaya.

10.1 General Guidance

Business decisions and actions must be based on the best interests of AmanahRaya and must not be motivated by personal considerations or relationships. Relationships with prospective or existing suppliers, contractors, customers, competitors, or regulators must not affect our independent and sound judgment on behalf of AmanahRaya.

General guidelines to help employees better understand common situations that may cause a conflict of interest are listed below. However, employees are required to disclose any situation that may be, or appear to be, a conflict of interest, in accordance with policy. When in doubt, it is best to disclose.

10.2 Outside Employment

Employees may not work for or receive payments for services from any competitor, customer, distributor, or supplier of AmanahRaya without approval in accordance with policy. Any outside activity must be strictly separated from AmanahRaya employment and should not harm job performance at AmanahRaya. Skills learned and used at

AmanahRaya must not be used in a way that could hurt the business of AmanahRaya. Employees who wish to work outside after the normal working hour of AmanahRaya should disclose and get permission from the Management.

10.3 Board Membership

Serving employee on a Board of Directors or similar body for an outside company or government agency requires advance approval in accordance with policy. Helping the community by serving on boards of non-profit or community organizations is encouraged and requires approval from the Management.

10.4 Family Members and Close Personal Relationships Interest

All employees may not use personal influence to get AmanahRaya to do business with a company especially to those involved in purchasing, supplying, and dealing with tender in which our family members or friends have an interest. Employees should disclose any close relationship that might make it appear that they could favor another company to the detriment of AmanahRaya’s interests to the Head, Group Compliance, Integrity & Governance Department.

10.5 Investment

Employees may not allow their investments to influence, or appear to influence, their independent judgment on behalf of AmanahRaya. This could happen in many ways, but it is most likely to create the appearance of a conflict of interest if an employee has an investment in a competitor,

supplier, client or distributor and his decisions may have a business impact on this outside party. If there is any doubt about how an investment might be perceived, it should be disclosed to the Management.

Employees are also prohibited from directly or indirectly buying, or otherwise acquiring rights to any property or materials, when they know that AmanahRaya may be interested in pursuing such an opportunity and the information is not public.

10.6 Gifts

Gifts are not always physical objects. They also may be in the form of services, favors, loans, or other items of value given to or received from those who are not engaged in work for AmanahRaya, and at the expense of our clients. It is our responsibility to decline any gift or other benefit that could influence our judgement or call into question our integrity or that of AmanahRaya.

10.7 Gifts to AmanahRaya's Employees

It is the duty of each employee to avoid the receipt, either personally or by or through family members or other acquaintances, of gifts, benefits, or unusual hospitality which are given for the purpose of, or which might have the effect of or appearance of, influencing the employees judgement in performing AmanahRaya's duties.

Complimentary hotel accommodations or air travel are included in this category. Such offers in conjunction with meetings or special events should generally be avoided and should be evaluated on the basis of their benefit and importance to AmanahRaya. If, after such review, it is determined that attendance is warranted, the Company should pay the expense of attending, utilizing its normal expense procedures.

Employees can however accept items of nominal value, such as small promotional items bearing another company's name or other corporate tokens of nominal value, or other nominal benefits such as speakers honorariums provided that the employees are not in a position to provide a

direct benefit or favor to the individual or organization (or perceived to be in that position), or be able to influence a decision desired by the giver (or perceived to be), and employees are not in the position to be influenced in making a business decision as a consequence of accepting gifts.

In rare situations, it may be impractical or harmful to refuse or return a gift. If this happens, employees must consult with the immediate superior for advice on whether or not the gift may be retained.

10.8 Gifts to be Given by AmanahRaya

Some business situations call for giving gifts. AmanahRaya's gifts must be legal, reasonable, and approved by the Management. When necessary to facilitate business and or business relations, gifts may be extended on behalf of AmanahRaya when sponsoring formal conferences for representatives of the governments or for private sector, and when conducting prestigious ceremonies that are attended by heads of state or government, distinguished persons, or the private sector. Our employees must never pay bribes.

10.9 Entertainment of AmanahRaya's Employees

We may accept entertainment that is reasonable and moderate in the context of the business, after our superior(s) are informed and that advances the company's interests. For example, accompanying a business associate to local cultural or sporting events or to a business meal would be acceptable in most cases.

Entertainment that is lavish or frequent may appear to influence our independent judgment on behalf of AmanahRaya. If an invitation seems inappropriate, we must turn down the offer or pay the true value of the entertainment ourselves. Accepting entertainment that may appear inappropriate should be discussed with the Management in advance, if possible.

11. WHISTLE-BLOWING POLICY

All employees are urged to promptly report illegal or unethical behavior, including financial misconduct and other violations of this Code and other internal governing documents.

All concerns or complaints made by the employees will be kept confidential and their identity will be kept anonymous, though they may be required by law to reveal this information in some circumstances.

AmanahRaya will not allow any retaliation against employees if they report misconduct of others in good faith. The whistle-blowing channel is:

<https://www.amanahraya.my/resources/whistleblowing/>

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The following are some guidelines employees may follow in reporting violations of this Code or other misconduct, or if are unsure about how to handle a situation:

- Employee are encouraged as a first step to speak openly and freely to his/her superior or department manager;
- If for any reason an employee is not comfortable approaching his/her supervisor or department manager or he/she is not satisfied that his/her complaint has not been handled fairly or appropriately, then the employee can contact the following parties:
 1. Designation : Head, Group Compliance, Integrity & Governance Department
 2. Designation : Integrity Manager
 3. Name : Ethics Center
 4. Telephone : 03-2055 7369
 5. E-mail : ethics_center@arb.com.my

It is AmanahRaya's wish to create an ethical environment across the Company from which we can all benefit. The Company undertakes that if any concerns are raised arising from this Policy, every reasonable effort will be made to maintain the confidentiality of the person raising the issue concerned.

12. ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

AmanahRaya is committed towards ensuring an unwavering level of integrity, accountability, and professionalism in its daily activities and business activities. AmanahRaya adopts a zero-tolerance approach against all forms of bribery and corruption in all our business dealings and relationships.

AmanahRaya will continuously conduct its business activities ethically, honestly, and not at any point of time in daily operations, compromise integrity and reputation even if such refusal of engaging in corrupt practices may result in the Company losing business.

12.1 Compliance to Governing Laws, Rules, and Regulations

Employees and all persons associated with AmanahRaya shall commit and comply with the MACC Act 2009, including the provision on Corporate Liability under Section 17A of the MACC Act 2009, and all applicable governing laws, rules, and regulations.

Being an officer of a government owned company, any employee of AmanahRaya who uses his or her office or position for gratification as provided under Section 23 of the MACC Act 2009, commits an offence, and will be dealt with under the MACC Act 2009.

12.2 Bribery, Corruption, and Malpractice

It is unlawful for employees to receive, solicit, give, or offer, any kind of gratification as a reward or enticement to do or withhold from acting in a certain way in relation to any matter in which friends, families, or business partners has a direct or indirect interest.

Additionally, any associated persons to AmanahRaya such as business partners, are not permitted to offer or provide AmanahRaya with any kind of gratification in order to persuade an employee to use his or her office or position when making decisions or acting in any way regarding any matter in which the employee's friends, families, or business partners have a direct or indirect interest.

It is forbidden for employees and AmanahRaya's associated persons to corruptly give, agree to give, promise, or offer any kind of gratification to any third party, whether for that party's benefit or another party's with the intention of obtaining or retaining business for AmanahRaya, or to obtain or maintain an advantage in the way AmanahRaya conducts businesses.

AmanahRaya encourages all employees and any of AmanahRaya's associated persons to report any corrupt activities or even suspicious corrupt activities with AmanahRaya as stated in provision 11 of this Code (Whistle-blowing Policy).

Any offence involving the acceptance, solicitation, giving, or offering of any kind of gratification will be dealt with under the MACC Act 2009 or any other applicable governing laws, rules, and regulations.

Employees and any of AmanahRaya's associated persons must abide by AmanahRaya's zero tolerance policy for bribery and corruption, as well as this Code, and AmanahRaya Anti-Bribery and Anti-Corruption Policy.

12.3 Anti-Bribery and Anti-Corruption Compliance Function

Group Compliance, Integrity & Governance Department (GCIGD) that is led by the Group Head, is an independent entity which is responsible for monitoring compliance on AmanahRaya's anti-corruption initiatives (also known as the five T.R.U.S.T Principles) based on the Ministerial Guidelines on Adequate Procedures. The group reports to the Board Risk and Integrity Management Committee (BRIMC) and AmanahRaya's Board of Directors for issues relating to bribery, corruption, abuse of power, and other types of malpractice.

12.4 Compliance to AmanahRaya Anti-Bribery and Anti-Corruption Policy

It is required that both employees and AmanahRaya's associated persons comply with AmanahRaya's Anti-Bribery and Anti-Corruption Policy. Any employee who violates the policy may face disciplinary action from AmanahRaya in line with its policies, procedures, and guidelines.

AmanahRaya's associated persons are also required to abide by AmanahRaya's Anti-Bribery and Anti-Corruption Policy. If any of AmanahRaya's associated persons violates the said policy, AmanahRaya's management may take the appropriate action.

13. ANTI-MONEY LAUNDERING, ANTI-TERRORISM FINANCING, AND PROCEEDS OF UNLAWFUL ACTIVITIES POLICY

13.1 Money Laundering

Money laundering is a 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.

In Malaysia, the offences of money laundering falls under the Anti-Money Laundering, Anti-Terrorism Financing, and Proceeds of Unlawful Activities Act 2001.

Employees should always ensure that they are conducting business with reputable customers, for legitimate business purposes and with legitimate funds. Employees need to be mindful of the risk of AmanahRaya's business being used for money laundering activities and if they suspect money laundering activities, they should immediately report it to the Head, Group Compliance, Integrity & Governance Department.

For the reasons above, any potential third party that wishes to conduct business with AmanahRaya, employees need to have a thorough understanding of the third party's operations and background. In order to ascertain the service, origin, and destination of fund and property (if applicable) belonging to the third party, proper due diligence must be carried out.

14. CERTIFICATION OF COMPLIANCE TO AMANAHRAYA CODE OF BUSINESS ETHICS FOR EMPLOYEES

I hereby certify that I have read and understood AmanahRaya’s Code of Business Ethics for Employees (the “Code”) and I understand that the Code applies to all employees and other representatives of the Company, including agents, consultants, independent contractors, and suppliers of AmanahRaya and its subsidiaries.

I agree that any business decisions and actions that I am dealing with shall be based on the best interest of AmanahRaya and its subsidiaries and shall not be motivated by personal interest, considerations, or relationships. My relationships with prospective or existing suppliers, contractors, clients, competitors, or regulators shall not affect our independent and sound judgment on behalf of the company.

I also certify that neither I, my spouse, dependent child, nor any of my immediate family members has shares, conducts business, has other direct or indirect financial interest or liability, or serves as an officer, director, committee member, or employee of any business entity that will have potential interference or affect any of my business decisions and area of responsibilities.

I further certify that I do not know of any other matter, including family or personal relationships, as defined by “relative” in Section 3 of the Malaysian Anti-Corruption Commission (MACC) Act 2009., which might give rise to an apparent or possible conflict of interest involving my present employment.

I also certify that I do not perform any outside employment or activity that conflicts with my official duties.

I am also aware of the prohibitions regarding gift acceptance from any business entity with whom I am dealing with, and I certify that I have not violated those prohibitions.

I hereby agree that I will fully comply with all provisions of the Code and understand my responsibility to immediately report any known or possible conflict of interest situations or suspected violations of the Code to my immediate supervisor, senior management, or the appropriate personnel of the Company.

I also certify that it is my understanding that any failure by me to comply with this Code may result in disciplinary action taken against me, up to and including termination of my employment.

I CERTIFY THAT THE ABOVE-MENTIONED STATEMENTS ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Signature : _____

Name : _____

I/C No : _____

Staff No : _____

Designation : _____

Date : _____

