



**PIMPINAN EHSAN BERHAD
(201601021838) (1192777-W)**

(Incorporated in Malaysia)

BUSINESS ETHICS POLICY

INTRODUCTION

Pimpinan Ehsan Berhad (“PEB” or “Company”) is committed to conduct its business with utmost integrity, transparency and accountability in order to safeguard the Company’s assets and enhance long-term shareholder value.

This Business Ethics Policy (“Policy”) is an extension of the Company’s commitment to following ethical business practices. It details the fundamental principles of ethical business behaviour and defines the responsibilities of all Directors, employees and Company’s representatives.

The Board of Directors is overall responsible for this Policy and shall ensure an effective implementation of it by the Management.

COMPLIANCE WITH LAW

The Company’s business, whether domestic or international, shall be conducted in compliance with all applicable laws and regulations. PEB will not tolerate illegal activity conducted for personal gain or on the Company’s behalf.

PEB expects all its employees at all levels to conduct themselves responsibly, honestly and with integrity in carrying out their duties and responsibilities, and to comply with the Company’s policies, procedures and applicable laws and regulations.

BRIBERY AND CORRUPTION

PEB has zero-tolerance to any form of bribery or corruption and is committed to upholding all laws relating to anti-bribery and anti-corruption. It is PEB’s principle never to accept, ask for, engage in, make, offer, promise or authorise any bribes to anyone, in any place, at any time.

The Company’s Anti-Bribery and Anti-Corruption Policy shall provide guidance to potential acts of bribery and when matters of corruption is concern.

FRAUD, TAX EVASION AND MONEY LAUNDERING

PEB has zero-tolerance to fraud, tax evasion and money laundering. The Company's accounts, financial records and public reporting shall accurately and truly reflect the transactions of the Company in accordance with the accounting practices and policies. No undisclosed or unrecorded funds or assets shall be established for any purpose.

PEB does not do business with persons or entities for the purpose of money laundering or any other criminal activities. It is key for the Company to know its clients, suppliers and other business partners to prevent any violation of anti-money laundering laws and regulations.

INSIDER DEALING

Non-public information is defined as information that has not been disclosed to the public and may have material effect on the share price or the value of the securities. Non-public information amongst others, includes;

- financial performance including earnings and dividend;
- mergers and acquisitions; and
- significant corporate exercises.

The use of any non-public information about the Company and its subsidiaries for personal financial gain or other benefit, is unethical and may also be a violation of law. Employees who are in possession of non-public information is prohibited from trading in the securities of the Company for personal gain, whether directly or indirectly. This prohibition extends to any act of disclosing the non-public information to another person, including family members, if the employee knows or reasonably knows that the other person would enter into market transactions 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 a member of the senior management team if the employee is uncertain of the status and nature of the information they possess.

CONFLICT OF INTEREST

All Directors and employees are expected to act only in the best interests of the Company and avoid situations or activities where personal interests are, or may appear to be in competition with the Company's interests.

Potential conflict of interest situations amongst others, includes;

- own or participate in a business that competes with the business of PEB, whether directly or indirectly;
- engage on PEB's behalf, in any transaction with a business in which the employee or a family member has an interest;
- serve on the Board of Directors or similar body of any organization with a business that may appear to be in competition of the Company's business;
- obtain personal benefits from those doing or seeking to do business with PEB; and
- utilise Company's resources, properties and inventories for personal gain.

Should an employee be faced with such situation or a transaction that might give rise to a conflict of interest, the employee must disclose or clarify such situation to a member of the senior management team or a human resource representative.

If the person is a Director of the Company, a disclosure must be made to the Board of Directors.

DISCLOSURE OF CONCERN

All Directors and employees are expected to comply with this Policy, and are encouraged to report any violation they observe to any member of the senior management, a human resource representative or may refer to PEB'S Whistle-blowing Policy for reporting methods.

Reports or other information received regarding alleged violations of this Policy shall be investigated and report to the Board of Directors on the results of investigations. No reprisal or retaliatory action will be taken against any employee for raising concerns under this Policy.

Any person who is found to have violated this Policy, will be subject to appropriate disciplinary measures for misconduct, up to and including dismissal.

REVISION AND PUBLICATION OF THIS POLICY

The Board of Directors shall review this Policy from time to time for effectiveness and to determine whether any changes are required. This Policy shall be made available to all via the Company's website.

This Policy has been approved and adopted by the Board of Directors on 22 February 2022.