MANFORCE GROUP BERHAD

(Registration No.: 201701014455 (1228620-V))
(Incorporated in Malaysia)

CODE OF CONDUCT

Introduction

The Code of Conduct ("Code") applies to all Directors and employees of Manforce Group Berhad ("the Company") and its subsidiaries ("the Group"), as well as the Group's customers and business partners in their dealings with the Group. Its establishes standard to ensure that working environment and condition are safe and healthy, employee is treated with respect and dignity, 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 and adopt 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 are and upheld and 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 other 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 wherever it operates and will take into consideration the needs and aspiration of local communities.

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I. Respecting Others

1) Unlawful Discrimination
We do not tolerate unlawful discrimination in the workplace or on the job. The Group shall not engage in discrimination based on race, color, age, gender, 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
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) Safety, Health and Environment
We undertake to ensure the working environment at our operating entities are being maintained safely, healthy and environmental friendly for our human capital.

5) 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.

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

7) 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.

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) 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.

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.

The management of conflict of interest shall be governed by Related Party Policy.

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.

We respect the confidentiality and privacy of our employees, customers, business partners and regulatory bodies with whom we do business and liaise with. Unless authorised, we do not use confidential information for personal use, 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 appropriate level of consent or authorisation to be so has been obtained from data subject and/or competing party, and/or compelled to do so by legal and regulatory requirements.

V. Channel to Report

Any employee who knows of, or suspects, a violation of the Code, is encouraged to whistle blow or report the concerns in accordance to Whistle Blowing Policy. No individual will be discriminated against or suffer any act of retaliation for reporting in good faith on violations or suspected violations of the Code.

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VI. Corporate Citizenship

- We commit our acts in a manner that is socially responsible to the society 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.
- We strictly prohibit insider trading and market manipulation in any form. All Directors and employees are required to comply with the Company's Securities Dealing Policy as well as all applicable laws and regulations, including Chapter 14 of the ACE Market Listing Requirements of Bursa Malaysia Securities Berhad.

Reviewed and updated on 27 April 2026