



ABLEGROUP BERHAD
Registration No. 200401015685 (654188-H)

CODE OF CONDUCT AND ETHICS

PART I : OVERVIEW

1.0 INTRODUCTION

The Code of Conduct and Ethics (the "Code") is applicable to all employees and Board members of AbleGroup Berhad ("AbleGroup" or the "Company") and its subsidiaries (collectively, the "Group"). It reflects the Group's underlying core ethical values and commitment to lay standards of integrity, transparency, fairness, accountability, contributing towards the social and environmental growth of the surroundings in which it operates, and the pursuit of excellence.

The Board members and employees must adhere to, comply with and uphold the provisions of the Code and the standards laid down hereunder in their day-to-day functioning.

2.0 PURPOSE OF THE CODE

The Code is formulated to enhance the standard of corporate governance and corporate behaviour with the intention of achieving the following aims:

- (i) To articulate the high standards of honesty, integrity, ethical and law-abiding behaviour expected of Directors;
- (ii) To encourage the observance of those standards to protect and promote the interests of shareholders and other stakeholders (including investors, employees, customers, suppliers and creditors); and
- (iii) To guide the Board as to the practices thought necessary to maintain the confidence of shareholders and other stakeholders in the Company's integrity.

3.0 KEY REQUIREMENTS

The Directors shall act within the authority conferred upon them in the best interests of the Company and should at all times observe the followings:

- (i) Clear understanding of the aims and purpose, capabilities and capacity of the Group;
- (ii) Devote sufficient time and effort to attend to the Group's duties required of him;
- (iii) Ensure at all times that the Group is properly managed and effectively controlled;
- (iv) Stay abreast of the affairs of the Group and be kept informed of the Group's compliance with the relevant legislation and contractual requirements;

- (v) Not divert to his own advantage any business opportunity that the Group is pursuing, or misuses confidential information obtained by reason of his office for his own advantage or that of others;
- (vi) At all times act with utmost good faith towards the Group in any transaction and to act honestly and responsibly in the exercise of his powers in discharging his duties;
- (vii) Exercise independent judgment and, if necessary, openly oppose if the vital interest of the Group is at stake;
- (viii) At all times exercise his power for the purposes they were conferred, for the benefit and productivity of AbleGroup; and
- (ix) Avoid any conflict of interest and to disclose immediately all contractual interests whether directly or indirectly involving AbleGroup and/or its subsidiaries.

4.0 AMENDMENTS TO THE CODE

The provisions of the Code may be amended and modified by the Board of the Company from time to time in line with any changes in law, changes in the Company's philosophy, vision, business plans or otherwise and all such amendments and modifications shall take effect from the date stated therein. All Directors shall be informed of such amendments and modifications.

PART II: CODE OF CONDUCT

5.0 PROMOTE PROFESSIONALISM AND COMPETENCY

The Group upholds the principle of promoting professionalism and improve competency of Management and employees at all time. Employees must strive to work professionally and effectively.

6.0 EQUAL OPPORTUNITY AND NON-DISCRIMINATION

The Group upholds the principle of diversity of workforce, equal opportunity, non-discrimination and fair treatment in all aspects of employment, including recruitment and hiring, compensation and benefits, working conditions, rewards and recognition as well as career development.

7.0 WORKPLACE HEALTH AND SAFETY

The Group is committed to providing a safe and healthy work environment to all employees. Health and safety support will be provided to employees so that they can understand their occupational health and safety obligations and diligently comply with all health and safety requirements, policies and procedures set out by the Group.

8.0 WHISTLEBLOWER

The Group has in place a Whistle-Blowing Policy which provides a platform where an individual can raise genuine and legitimate concern on a reportable misconduct. The Whistle-Blowing Policy is available at the Company's website.