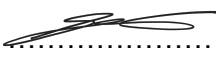


Group Code of Conduct & Business Ethics Policy

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Reviewed By Audit Committee			Reviewed Date 23 November 2023
Approved By Board of Directors			Approved Date 24 November 2023
Signed on behalf of the Board of Directors Dato' Sean H'ng Chun Hsiang Executive Deputy Chairman and GCEO		 (Signature)	

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REVISION TABLE

Revision No.	Description of Change	Clause(s) Affected	Requestor	Effective Date
01	Update of terms	Document content	Manager, GRC	24/11/23
02	Adapt to new template	Document Template	Manager, GRC	-

Group Code of Conduct & Business Ethics Policy

1.0 PURPOSE

- 1.1 Leader Energy Group Berhad (“LEGB”) (formerly known as Leader Energy Holding Berhad) and its subsidiaries (the “Company” or collectively known as “LEGB Group” or the “Group”) are committed to conducting its business affairs ethically and in compliance with all applicable laws and regulations in the countries where it does its business. The Group’s Code of Conduct & Business Ethics (“COCBE”) defined the set of organisational rules and standards regarding the Group’s ethics (values and beliefs) as well as matters of legal compliance that govern the conduct of the Group and its Employees.
- 1.2 COCBE is part of the Group’s overall corporate enhancement program. It reflects the increasing importance and need for effective corporate governance compliance measures in the conduct of the Group’s business locally, regionally and globally.
- 1.3 The Group Code of Conduct & Business Ethics (COCBE) Policy (“this Policy”) is originally prepared in English and it may be translated to other local languages for the adoption by respective subsidiary companies operating outside Malaysia. However, in the event of a conflict, the English version will govern.
- 1.4 The Policy is established by the Board of Directors of LEGB to provide guidance on the rules or standards of business conduct to all its Employees within the Group, in the performance of their duties and responsibilities to ensure compliance with the Group’s commitment to ethical and lawful conduct.
- 1.5 It is not a manual that provides every detailed guideline to deal with the ethical dilemmas, prejudices and grey areas that are encountered in everyday work. Each Employee needs to evaluate and consider carefully specific cases in practice to make right choices and decisions that, if not specifically covered by this Policy, are consistent with the corporate values and principles.
- 1.6 This Policy is not meant to substitute any relevant standards, rules and policies, but to complements them and support the Group to create a positive public identity, standardises processes and policies, and to increase the level of public confidence and trust among its important Business Associates.
- 1.7 This Policy shall be reviewed by the Board of LEGB periodically or as and when need arises to ensure it is kept contemporaneous.

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2.0 SCOPE

- 2.1 This Policy compliance apply to all Employees (including the directors - whether executive or non-executive, except as otherwise stated in this Policy, whether temporary, contract-basis or permanent) of the Group irrespective of whether they are stationed in Malaysia or outside Malaysia.
- 2.2 The Group also expects that its Business Associates performing work or services for or on behalf of the Group to comply with the relevant parts of this Policy when performing such work or services. Non-compliance may result in the termination of the non-complying party's relationship with the Group and other adverse consequences.
- 2.3 Joint venture companies in which LEGB is a non-controlling shareholder or partner (if any) and associated companies (if any) are encouraged to adopt this Policy as the bare minimum or similar principles and standards as part of the Group's anti-corruption framework.
- 2.4 The provisions of this Policy may be amended or waived by the Group from time-to-time in the Group's sole discretion. The Group expects that waivers would only be granted in exceptional circumstances and then only in keeping with applicable laws and the Group's policies and procedures.

3.0 TERMS AND DEFINITIONS

The terms and definitions used in this procedure are as follows.

Term	Abbreviation	Definition
Board or Board of Directors	BOD	Means the Board of Directors of LEGB and/or any of its subsidiary as applicable.
Business Associate	-	A third parties with whom the Group has, or plans to establish, some form of business relationship. This may include customers, suppliers, vendors, distributors, contractors, subcontractors, outsourced service providers (e.g. consultants, advisers, solicitors, agents), lenders, representatives, introducers/ intermediaries, investors, joint venture partners etc.
Code of Conduct & Business Ethics (COCBE)	-	A set of organisational rules or standards regarding the Group's ethics (values and beliefs) as well as matters of legal compliance that govern the conduct of the Group and its Employees.
Directors	-	Include all independent and non-independent directors, executive and non-executive directors of the Group and shall also include alternate or substitute directors.

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Term	Abbreviation	Definition
Employees	-	All individuals directly contracted to the Group on an employment basis, including permanent and temporary staff / workers and directors.
Group Compliance Office	-	Refers to the LEGB Group's Governance Risk Management & Compliance.
Group Compliance Officer	-	Refers to the Head of Governance, Risk Management & Compliance Division of Leader Energy Group Berhad.
Family or household	-	Includes spouse(s), children (including stepchildren and adopted children), parents, stepparents, siblings, stepsiblings, grandparents, grandchildren, in-laws, uncles, aunts, nieces, nephews, and first cousins, as well as other persons who are members of one's household.
Law	-	The system of rules which a particular country or community recognises as regulating the actions of its members and which it may enforce by the imposition of penalties.
Line Manager	-	The Employee who is the immediate supervisor of any other given LEGB Employee.
Group Management	-	Comprises of LEGB Executive Deputy Chairman, Group Chief Executive Officer, Group Chief Financial Officer, Group Chief Operating Officer, Chief Investment Officer cum Investor Relations, Chief Sustainability Officer, Director of Human Resource and Chief Executive Officer (Roof Top Solar).
Table of Authority Limits (TAL)	-	A table that sets out the key business areas that requires financial and non-financial approval based on limits delegated to shareholders, the Board, the Group Management, the Country Management and the Site Management.

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4.0 CORPORATE VALUES AND PRINCIPLES

- 4.1 The Group is committed to conducting its business affairs ethically and in compliance with all applicable laws and regulations in the countries where it does business.
- 4.2 The Group believes in continuous improvement in the businesses as well as empowering the people, recognising their contributions and helping them to realise their full potential. The Group places emphasis on the respect and dignity in the workplace for its Employees, always

5.0 ROLES AND RESPONSIBILITIES

- 5.1 The Group has established the Group Compliance Office to be responsible for the administration and implementation of this Policy.
- 5.2 The Group Compliance Office is adequately equipped to act effectively against bribery and corruption in the following manner:
- (i) provide advice and guidance on this Policy and compliance.
 - (ii) take appropriate steps to ensure that there is adequate monitoring, measurement, analysis and evaluation of this Policy compliance to be carried out (when needed) in conjunction with the measures undertaken to ensure the Group Anti-Bribery and Anti-Corruption Policy and Procedures compliance; and
 - (iii) reports on the Group's COCBE compliance matters to the Group management and the Board where needed.

6.0 COMPLIANCE WITH LAWS AND REGULATIONS

- 6.1 This Policy is applicable across the Group. The subsidiary operations in respective countries are subject to the local laws of the countries but the principles of this Policy must be always adhered to.
- 6.2 In cases where there is a conflict between the mandatory law and the principles contained in this Policy, the Employee should comply with those laws and immediately inform GCO about the conflicts. If Employee perceives that a provision in this Policy conflicts with the local laws in the country they are in, they should consult with the Group Compliance Officer (who may engage a lawyer for advisory, if needed) rather than disregard this Policy without consultation.
- 6.3 However, if a local custom or policy conflicts with this Policy, this Policy will take precedence over the local custom or policy. Any questions arise about any of these conflicts, should refer to the Group Compliance Office.
- 6.4 For any doubts about the scope of applicable laws or the application of this Policy in keeping with ethical and lawful conduct, the Employee should contact the Group Compliance Office immediately.
- 6.5 This Policy does not identify or set out every law, policies and procedures that may apply in the performance of daily roles of each Employee. Hence, all Employees are responsible for keeping themselves inform on any local laws and other policies and procedures of the Group that apply to him/ her because of his/ her role with the Group.

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7.0 PROCEDURES

7.1 DUTIES OF GOOD FAITH, FIDELITY, DILIGENCE AND INTEGRITY

All Employees have a duty to serve the Group with good faith, fidelity, diligence and integrity. They are required to act in the best interests of the Group and to refrain from engaging in conduct or activities which may adversely affect the Group. Employees of the Group and its Business Associates are at all times required to:

- conscientiously maintain the highest degree of integrity.
- always exercise proper care and judgment.
- avoid conflicts of interest.
- refrain from taking advantage of one's position or exercising one's authority to further one's own personal interest at the expense of the Group, and
- comply with applicable laws, regulations and the Group's applicable policies and procedures.

7.1.1 *Compliance with Laws, Rules and Regulations*

- (i) The Group shall observe and comply with all laws and regulations that are applicable to the conduct of the Group's business wherever located.
- (ii) Employees shall adhere to internal rules and regulations as they apply in a given situation. Those internal rules are specific to the Group and may go beyond what is required by the law.
- (iii) If an Employee is instructed by his/ her Line Manager or superior to do something that involves or appears to involve an illegal activity or a breach of internal rules and regulations, he/ she shall report the matter to the Group Compliance Officer (GCO). Complaints may also be lodged via whistleblowing channel as set out in Section 7.5 of this Policy.

7.1.2 *Competition and Fair Dealing*

- (i) The Group shall compete for all business opportunities fairly and ethically, and within the framework of all applicable competition laws.
- (ii) Every Employee shall deal fairly with the Group's Business Associates (e.g. customers, suppliers and service providers) and competitors and shall not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing or practice.
- (iii) No price fixing, bids rigging or similar unethical or illegal business practices is permitted. The competition laws of every country in which the Group operates shall be complied.

7.1.3 *Guarding against Bribery and Corruption*

- (i) Bribery is defined as the offering or receiving of any gift, loan, fee, reward or other advantages to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust, in the conduct of the enterprise's business.

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- (ii) Corruption is defined as the abuse of entrusted power (office or position) for private gain or the misuse of position to help others in improperly enriching themselves or getting power.
- (iii) Employees and Business Associates are **prohibited** from engaging in any form of bribery and corruption, whether it be directly or through a third party (such as an agent or distributor) which are deemed unethical and will tarnish the Group's reputation if the Group is being charged with criminal liability (corporate liability).
- (iv) The Group has adopted a zero-tolerance approach against all forms of bribery and corruption and is committed to behaving professionally, fairly and with integrity in all its business dealings and relationships. It undertakes control measures that are proportionate to the risks identified to counter bribery and corruption.
- (v) All Employees must comply with all applicable anti-bribery and anti-corruption laws and regulations in countries in which the Group operates. Detailed anti-bribery and anti-corruption guidance on areas with high exposure to corruption risks can be found in section 8.2 of the Group Anti-Bribery and Anti-Corruption Policy.

7.1.4 Conflicts of Interest

- (i) All Employees have a duty to be free from the influence of any conflicting interest when they represent the Group and are expected to deal with Business Associates on the sole basis of what is in the best interest of the Group.
- (ii) A conflict of interest arises when the personal interests or activity of an individual Employee could be seen to have the potential to interfere with the objectivity in performance of that individual's duties and responsibilities to the Group.
- (iii) Each Employee shall identify and avoid any situation that affects or appears to affect his/her ability to act in the best interests of the Group. Some examples of conflicts of interest situations are:
 - If an Employee competes with the Group.
 - If an Employee owns an interest in, directly or indirectly, or works for a competitor, customer, supplier, or any business that does or seeks to do business with the Group.
 - If an Employee accepts loans, services, significant gifts or other benefits from customers or suppliers.
 - If an Employee contracts or deals with customers or suppliers of the Group owned by his/ her close friends or family.
- (iv) Any Employee who has or proposes to have a conflicting interest shall disclose it to his/her Line Manager who shall escalate the report to the Group Compliance Office for obtaining further approval/ clearance. Such reporting must be reported (utilising the Conflict-of-Interest Disclosure Form found in **Form 1**) as soon as practicable stating the nature, facts, extent of the conflict and proposed action to resolve/ manage the conflict.
- (v) This disclosure requirement extends to the Employee's family or household member's (i.e. spouse, parents, children and their spouses and siblings and their spouses) interests in suppliers, customers, contractors and all other business enterprises with significant transactions or dealings with the Group.

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- (vi) Failure to report when a conflict of interest (or potential conflict of interest situation) becomes known to the Employee/ Business Associates and/ or failure to comply with the requirement of the Group will be deemed to be a conflict of interest for which appropriate disciplinary actions may be taken against the relevant parties.
- (vii) When such a conflict-of-interest situation becomes known to Employee/ Business Associates, unless otherwise instructed/ approved by the Group, he/ she will abstain from participating in the decision making or deliberations involving the entity or person and also avoid doing anything which could influence the decisions on such dealings.
- (viii) Approval / clearance from the Board of Directors of respective companies within the Group shall be obtained for directors' conflict of interest.
- (ix) Conflicts of interest and potential conflicts of interest which have been fully disclosed and which are formally permitted by respective companies' Board will not constitute violations of this Policy.

7.1.5 *Gifts, Entertainment, Hospitality and Travel*

- (i) The Group prohibits the use of improper gifts, entertainment, hospitality and travel to influence business decisions. Every Employee must comply with the applicable policies, procedures, laws and regulations related to the use of gifts, entertainment and travel in all countries in which the Group operates.
- (ii) The Group recognises that the practice of giving and receiving business gifts, entertainment, hospitality or travel varies amongst countries, regions, cultures and religions. As such, definitions of what is acceptable and not acceptable will inevitably differ for each. The intention behind the gift should always be considered, so that it does not create an appearance of bad faith and impropriety and should not be misunderstood by others to be a bribe.
- (iii) Employees of the Group are expected to exercise proper judgment in handling the giving and receiving gifts, entertainment, hospitality or travel activities and behave in a manner consistent with the general principles set out in section 7.0 above.

Gifts

- (iv) All Employees and their family members must not solicit any gifts from the Business Associates directly or indirectly. Employee and their family members are also discouraged from accepting gifts from these parties. Occasional acceptance of gifts (subject to criteria and approvals set out in the Group ABC Policy) is allowed to promote good business relationships.
- (v) Similarly, Employees may offer gifts to promote good business relationships. However, he/ she must be sensitive to the recipient organisation's gifts receiving policy.
- (vi) Gifts in the form of cash or cash equivalents, personal services or those otherwise that may put the Employees in a position of conflict, influence the business decision or was otherwise intended or given with the expectation of gaining any advantage must never be accepted or offered.

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Entertainment and Hospitality

- (vii) All Employees and family members must not solicit any form of entertainment and/ or hospitality from the Business Associates directly or indirectly. Invitations to social events or entertainment may be accepted within reason according to the scope of work provided these events or entertainment are not lavish or become a regular feature that may influence business decision making process.
- (viii) Modest entertainment and/ hospitality that is legal and reasonable within the scope of work may also be offered. When offering entertainment, the Employee must be sensitive to the recipient organisation's entertainment and hospitality receiving policy.
- (ix) Employee must not accept, engage or offer any entertainment and/ or hospitality that is indecent, sexually oriented or that otherwise might put him/ herself in a position of conflict or adversely affect the Group's reputation.

Travel

- (x) The Employee may accept lodging and other expenses (e.g. food, transportation) provided by Business Associates within the host country if the trip is for business purposes and prior approval has been obtained according to the Group's policy.
- (xi) Unless prohibited by law or the policy of the recipient organisation, the Group may bear the costs of transportation and lodging for the Business Associates in connection with a visit to the Group's facility. The visit must be for a legitimate business purpose e.g. on-site examination of equipment, contract negotiations or training. Prior approval in accordance with established procedures must be obtained.
- (xii) The Group accepts normal and appropriate gestures of goodwill and hospitality (whether given to or received from third parties) so long as the giving or receiving of gifts, entertainment, hospitality and travel meets the following requirements:
 - It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours, positions or benefits,
 - It is not made with the suggestion that a return favour is expected,
 - It is in compliance with local laws,
 - It is given in the name of an organization, not in an individual's name,
 - It does not include cash or a cash equivalent (e.g. a voucher or gift certificate);
 - It is appropriate for the circumstances (e.g. giving small gifts around festive seasons or as a small appreciation to an organization for helping with a large project upon completion),
 - It is of an appropriate type and value, and given at an appropriate time, taking into account the reason for the gift, entertainment, hospitality and travel,
 - It is given or received transparently,
 - It is not selectively given to a key or influential person, clearly with the intention of directly influencing them,

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- It is given or received in line with the authority limits established under respective companies' Table of Authority Limits, and
 - It is not offered to, or accepted from, a government official or representative, politician or political party, without the prior sanction based on the Group's approval mandate.
- (xiii) Gifts, entertainment, hospitality or travel given and received should always be disclosed to the Group Compliance Office. Disclosure can be made via the Gifts, Entertainment, Hospitality or Travel Registration Form found in **Form 2**. Disclosure should be made to the Group Compliance Office as soon as possible for clearance before next actions (including to return to giver if necessary).
- (xiv) Gifts, entertainment, hospitality or travel refused should be politely returned with a note of explanation about the potential breaches by the Company on this Policy.
- (xv) The intention behind a gift, entertainment, hospitality or travel being given or received should always be considered. If there is any uncertainty, the Employees should seek the advice of the Group Compliance Officer

7.1.6 Corporate Social Responsibility (CSR), Donations and Sponsorship

- (i) The Group is committed to contributing to the wellbeing of the people and nation in countries where it operates. It accepts and encourages the act of donating to charities as part of its CSR initiatives, whether through services, knowledge, time or direct financial contributions (cash or otherwise). Unfortunately, even legitimate donations and sponsorships sometimes have the risk of creating the appearance of bribery and corruption.
- (ii) Employees must ensure that request for CSR, donations and sponsorship must be carefully examined for legitimacy and are not used to facilitate and conceal acts of bribery. Hence, in line with the Group's value of integrity and transparency, all CSR, donations and sponsorship must comply with the following:
 - The contributions are allowed by applicable ABC laws,
 - All CSR, donations and sponsorships are to be made after receiving authorisation based on respective subsidiary companies' Table of Authority Limits,
 - Any red flags arise must be resolved before committing any funds to the programme. Even though requests are determined to be legitimate, the requests must be carefully structured to ensure that benefits reach their intended recipients,
 - Contributions are made to properly established entities having an adequate organisational structure to guarantee proper administration of the funds, Proper due diligence needs to be carried out in particular to ascertain whether any Public Officials are affiliated with the organisation,
 - Be accurately stated in the company's accounting books and records, and
 - Must not to be used as a means to cover up an undue payment or bribery.
- (iii) If in doubt, whether a charitable contribution or social benefit is appropriate, consult the local Human Resource Department and check with the Group Compliance Officer who may then engage legal adviser (if needed) to determine the authenticity of such requests.

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7.1.7 *Political Contributions*

- (i) The Group observes all applicable laws and regulations concerning political contributions in the countries that we operate in. No company funds or resources shall be used to make any direct or indirect political contributions on behalf of the Group without approval from the Board.
- (ii) If any of the Employee wish to contribute his/ her own time or money to any political activity, it shall be deemed as an entirely personal and voluntary decision.
- (iii) Corporate political contributions are strictly regulated and must be approved by the Board of Directors of LEGB, and no political contribution may be made unless the Group has received a satisfactory opinion from qualified local legal counsel as to its legality under applicable laws.
- (iv) Political contributions or expenditures include, but not limited to:
 - Paying for advertisements and other political campaign expenses;
 - Buying tables for fundraising dinners organised by a political party; and/or
 - Loaning Employees to support political events during working hours.

7.1.8 *Business and Financial Records*

- (i) The Group's documents and records (not only financial accounts but other operations records as well) are meant for business purposes and requirements, compliance with legal, tax, accounting and regulatory laws. All Employees must control and maintain such records so that they are accurate, up-to-date, legible, readily identifiable and retrievable. All Employees must also ensure that all records are handled according to the appropriate level of confidentiality, in accordance with any applicable policies and procedures and in conformity with all applicable laws and regulations.
- (ii) The preparation of the reports and documents must be:
 - maintained and supported by accurate documentation in reasonable details.
 - fairly and accurately reflected the nature of the transactions or occurrences to which they relate;
 - in compliance with applicable laws and accepted accounting and reporting standards; and
 - conformed to legal requirements and to the Group's system of internal controls.
- (iii) Falsification of financial or any other records or misrepresentation of information may constitute fraud and can result in civil and criminal liabilities for Employees and the Group. All Employees are obliged to report false entries or omissions and to highlight questionable or improper accounting in the books and records of the Group.
- (iv) All Employees must not, for example:
 - conceal, alter, destroy or otherwise modify the Group's records or documents other than in accordance with established, ordinary course procedures (and in no case impede or frustrate an investigation or audit or conceal or misstate information);
 - intentionally make a false or misleading entry in a record, report, file or claim (including travel and entertainment expense reports).

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- establish accounts, companies or arrangements to circumvent or frustrate the Group's controls, policies or procedures;
 - fail to cooperate fully and truthfully with internal and external audits authorised by the Group; or
 - engage in any scheme to defraud anyone of money, property or honest services.
- (v) All Employees must ensure that the business communication is clear, truthful and accurate. All Employees must avoid misleading information, speculative opinions or derogatory remarks. This applies to communications of all kinds, including formal and informal e-mail, notes or memos.

7.1.9 *Use of Company Assets (including Email and Internet Services)*

- (i) All Employees should protect the Group's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Group's profitability. All company assets are to be used for legitimate company purposes. Any suspected incident of fraud, theft or misappropriation should be immediately reported for investigation.
- (ii) Email systems and internet services are provided for work purpose. Incidental and occasional personal use is permitted but never for personal gain or any improper purpose. Employees should use good judgement and should not access, send, download or store any information that is inappropriate insulting or offensive.

7.1.10 *Outside Appointments*

- (i) As the Group's Employee, he/ she must devote the time and attention to the fulfilment of obligations to the Group. The Group Employees may not take up other employment or gainful activity, whether part-time or full-time, or be involved in any outside business activities, in whatever capacity (including being involved in the management, direction or conduct of another enterprise) without the express written permission from the Group Chief Executive Officer (Group CEO).
- (ii) All Employees must also seek the consent of the Group CEO before undertaking any appointments, e.g. board and committee memberships, of any organisation outside of the Group. If he/ she is already engaged in any other gainful activity or involved, either directly or indirectly, in the management or business activities of any other company or companies, firms, corporations or other business activities, he/ she should come forward and disclose his/ her activity to the Group Compliance Office.
- (iii) The granting of permission will be subject to satisfying the Group that such activity will not interfere with or compromise the proper performance of one's duties or the fulfilment of one's obligations to the Group.
- (iv) Any permission granted may be withdrawn at any time at the sole discretion of the Group without the need for assigning any reason thereof. In such an event, the Group will be deemed fully indemnified by the Employees and will not be held liable for any repercussion arising from such decision to withdraw the permission so granted before.

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7.2 WORKPLACE CULTURE AND ENVIRONMENT

7.2.1 *Fair, Safe and Conducive Workplace Environment*

- (i) The Group is committed to providing a safe, secure and conducive workplace culture and environment, where the values of mutual and reciprocal respect, trust and confidence are upheld and actively promoted.
- (ii) Unlawful discrimination in the workplace or job such as race, national origin, religion, gender, age, or sexual orientation or marital status will not be tolerated. All Employees must comply with laws in local jurisdiction that prohibit workplace discrimination.
- (iii) The Group is committed to providing a conducive working environment where the Employee's right to protection from all forms of sexual harassment and unsolicited or unwarranted sexual overtures and advances is accorded due recognition.
- (iv) The Group shall comply with all applicable laws and relevant industry standards of practice concerning protection of the health and safety of its Employees in the work place and minimising the impact of its operations on the environment.
- (v) All Employees are expected to act responsibly to help make the workplace healthy and safe and to report any accidents, injuries and unsafe equipment, practices or conditions immediately to Line Manager, supervisor or other designated personnel.

7.2.2 *Non-Business Workplace Relationships*

- (i) When Employees have relationships which go beyond professional relationships and social friendships, such relationships may create conflicts of interest as well as opportunities for exploitation, favouritism or bias. Such relationships can also undermine the Group's core values such as respect and trust amongst staff, and impact upon the reputation and integrity of the Group.
- (ii) Such relationships can create a real likelihood of disaffection, disharmony and significant challenges for the parties concerned as well as for other co-Employees of the Group. Under such circumstances, such relationships are discouraged.
- (iii) Potential conflict of interest can arise when an Employee manages someone with whom he/ she have a family, romantic or intimate relationship. Even if he/ she acts properly, the relationship will be perceived as having influence over his / her judgment.
- (iv) Accordingly, the Employee should avoid supervising, directly or indirectly, any individuals with whom he/ she has such relationship without written clearance from the Group CEO.

7.3 CONFIDENTIALITY OBLIGATIONS/ PUBLIC COMMUNICATIONS

7.3.1 *Proprietary and Confidential Information*

- (i) The Group values and protects all proprietary and confidential information. In the performance of duties, the Employee may obtain information not generally available or known to the public or the market. Hence, he/ she must not communicate or disclose this information in any manner to competitors, customers, persons engaged in any aspect of the securities industry, members of trade associations or other third parties unless such communication or disclosure is authorised by the Group Management in writing or required by laws or regulations.

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- (ii) The Employee must be aware that any unlawful or unauthorised disclosure of proprietary or confidential information may result in irreparable loss and/ or damage to the Group. In such cases, the Group may institute civil and criminal proceedings against the offending party.
- (iii) It is equally important that proprietary or confidential information is only disclosed to other Employees on a need to know basis.
- (iv) The Employee has an obligation to continue to preserve the proprietary and confidential information for a period of TWO (2) years even after the appointment/ employment has ceased, unless disclosure is required by any order of any court of competent jurisdiction or any competent judicial, governmental or regulatory authority.
- (v) During the employment / engagement relationship with the Group, the Employee / Business Associate may have established contacts and relationships with the Group's vendors, suppliers, contractors, principals and other business partners. He / she will not at any time during his / her relationship with the Group, or for a period of two years (or for whatever other period of time as may be specified in the terms of the engagement) after the cessation of the relationship with the Group, whether by resignation or otherwise, make use of business opportunities arising from the relationship with the Group or cause or attempt to cause the diversion of such business opportunity from being exploited by the Group or cause or attempt to cause the termination of contracts, agencies or other business relationships of the Group without first obtaining the prior consent of the Group.

7.3.2 *Making of Public Statements*

- (i) Irrespective of whether in personal or official capacity, all Employees will not either orally or in writing or in any form (including on social media websites) make or circulate any public statement on the policies or decisions of the Group or discuss publicly any measure taken by the Group or any official matter taken or carried out by the Employees, unless he/ she is duly appointed or authorised to make such statement on behalf of the Group.
- (ii) All Employees will not, either orally or in writing or in any other form (unless he / she is appointed or authorised as aforesaid), make any public statement or comment on any matter relating to the work of the department or organisation in which he / she is or was employed, or relating to any organisation with which the Group has dealings:
 - where such statement or comment may reasonably be regarded as indicative of the policy of the Group; or
 - where such statement or comment may embarrass or is likely to embarrass the Group; or
 - where such statement or comment may compromise the interests and reputation of the Group.

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- (iii) In this Section, “public statement” or “discuss publicly” includes the making of any statement or comment to the press, magazines, periodicals or the public or in the course of any lecture or speech or the broadcasting thereof by sound, vision or electronic means. It also applies to every kind of correspondence including mail, electronic documents, instant messages, websites, social media tools, blogs, paper documents, facsimile, voice and voicemail recordings.

7.3.3 Social Media

- (i) Every Employee has the responsibility to protect the Group's reputation and brand image. When using one's private social media accounts, the Employee must ensure that his / her posts reflect only his / her personal opinions and does not negatively affect public perception of the Group. The Employee should also take extra precaution to not share any confidential and proprietary business information.
- (ii) Employee and Business Associates who are tasked to manage the Group's official social media accounts (if any) are also responsible in ensuring that the management of the accounts, and the activities within, are in accordance with the Group Management's directives.

7.4 **EMPLOYEES RESPONSIBILITIES**

7.4.1 Employees of the Group are responsible to ensure the following:

- (i) they certify in writing that they have *read, understood* and *will comply* with this Policy. A copy of this declaration shall be documented and retained by the Human Resources Department for the duration of the Employee's employment. A sample of the Staff Acknowledgement Form can be found in the **Form 3**.
- (ii) Be familiar with applicable requirements and directives of this Policy and communicate them to subordinates;
- (iii) Observe high standards of business and personal ethics in the conduct of their duties and responsibilities;
- (iv) Practice honesty and integrity in fulfilling his / her responsibilities and comply with all applicable laws and regulations;
- (v) Maintain a work environment that fosters fairness, respect and integrity. The Group requires all Employees to conduct themselves in a lawful, honest and ethical manner in all of the Group's business practices;
- (vi) Promptly report violations or suspected violations through appropriate channels; and
- (vii) Promptly complete the Group's ABC Policy, COCBE Policy and Whistleblowing Policy trainings as well as attest to comply annually.

7.4.2 If any Employee breaches this Policy, the Employee will face disciplinary action and could face dismissal for gross misconduct. The Group has the right to terminate a contractual relationship with an Employee if the Employee breaches this Policy.

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7.5 WHISTLEBLOWING POLICY

- 7.5.1 The Group encourages openness and transparency in its commitment to the highest standard of integrity and accountability. Hence, the Group expects the Employees and the Business Associates to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.
- 7.5.2 If the Employees or the Business Associate suspect, or reasonably believe that another person subject to this Policy may have committed or may be about to commit any breach of any of his/ her terms and conditions of service, of his / her engagement, or of this policy, or to violate the Group policies or procedures or applicable law, whether deliberately or through inadvertence, they (the Employees or Business Associates) have the obligation to report the concerns to the Group Compliance Office. The reporting channel under the Whistleblowing Policy is available at <http://www.leaderenergy.com>.
- 7.5.3 This whistleblowing channel provides an avenue for anyone who has the knowledge about the non-adherence to this Policy to lodge a complaint in good faith and without the fear of being identified and retaliated.
- 7.5.4 All complaints reported will be taken seriously, treated in confidential manner and investigated where deemed warranted. The whistleblower's anonymity will be protected unless the disclosure is required by law pursuant to an investigation or legislation. Hence, the whistleblower may be required to provide a statement as supporting evidence to any investigation.
- 7.5.5 The Group will support anyone who raises concerns in good faith under this Policy, even if investigation later found that he/she was mistaken. However, anyone who makes any malicious, scandalous or vexatious report, and particularly if they persist with such untrue allegations, they will be subjected to the Group's disciplinary actions.
- 7.5.6 For the Employees, if he / she is uncertain about whether a certain actions or behaviours could be considered breach of this Policy, the Employee should speak to his / her line manager or directly to the Group Compliance Officer.

7.6 NON-COMPLIANCE AND SANCTIONS

- 7.6.1 Group Compliance Office shall conduct regular validation to ensure compliance to this Policy. Such validation exercises may be conducted either independently by Group Compliance Office or in collaboration with external consultants.
- 7.6.2 Non-compliances identified by the independent review undertaken shall be reported to the Board of LEGB.
- 7.6.3 The Group regards any non-compliance with laws e.g. anti-bribery and anti-corruption laws as a serious matter. Non-compliance may lead to disciplinary action, up to and including termination of employment. Further legal action may also be taken in the event that the Group's interests have been harmed as a result of non-compliance.

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- 7.6.4 The Group shall notify the relevant regulatory authority if any identified bribery or corruption incidents have been proven beyond reasonable doubt. Where notification to the relevant regulatory authorities have been done, the Group shall provide full co-operation to the said regulatory authorities, including further action that such regulatory authority may decide to take against convicted Employees.

8.0 LIST OF SUPPORTING DOCUMENTS

Supporting Document	Reference Number
Form 1 - Conflict of Interest Disclosure Form	LEGB-GPOL-GRC-06-F1
Form 2 - Gifts, Entertainment, Hospitality or Travel Registration Form	LEGB-GPOL-GRC-06-F2
Form 3 - Staff Acknowledgement Form	LEGB-GPOL-GRC-06-F3

9.0 REFERENCES

Reference Document	Reference Number
Group Anti-Bribery & Anti-Corruption Policy	LEGB-GPOL-GRC-05
Group Whistleblowing Policy.	LEGB-GPOL-GRC-07

LEGB-GPOL-GRC-06 Group Code of Conduct & Business Ethics Policy

Final Audit Report

2025-07-08

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