

CODE OF CONDUCT AND ETHICS

1. INTRODUCTION AND PURPOSE

- 1.1 The Board of Directors ("Board") of Ancom Nylex Berhad ("ANB" or "Company") is committed to upholding high standards of business conduct and to fostering a corporate culture grounded in integrity, transparency and fairness throughout the Company.
- 1.2 Through this Code of Conduct and Ethics ("Code"), the Board sets the tone and governance standards for ANB and its subsidiaries ("Group"). It is the duty and responsibility of every Director to be guided by the policies and procedures set out in this Code, and to understand clearly what constitutes acceptable behaviour and practice within the Group.
- 1.3 The Group's ultimate objective is to achieve its business goals responsibly and sustainably, for the benefit of its shareholders, employees, business partners and society at large.
- 1.4 For the purpose of this Code, any reference to the Company shall, where applicable, also mean the Group.
- 1.5 This Code is formulated to strengthen corporate governance and promote ethical business conduct within the Group. Its objectives are to:
 - (a) establish and uphold a standard of ethical behaviour founded on trustworthiness, integrity and values that can be embraced by all individuals across the Group;
 - (b) promote professionalism, objectivity, transparency and accountability, in line with applicable laws, regulations and the Group's commitments to environmental and social responsibility; and
 - (c) provide guidance on managing conflicts of interest and preventing misconduct, such as abuse of power, corruption, insider trading and money laundering.
- 1.6 While this Code offers guiding principles, it cannot anticipate every situation that may arise. Directors are expected to exercise sound judgment and act ethically at all times. A Director who is uncertain how a specific situation relates to the provisions of this Code should consult the Chairman of the Board, who may consult internal or external legal counsel as appropriate.

2. SCOPE AND APPLICATION

- 2.1 This Code applies to all Directors of the Company and its subsidiaries, save for subsidiaries that are separately listed, as such entities may already have, or may subsequently adopt, their own code of conduct and ethics.
- 2.2 All Directors are required to comply with all applicable laws, rules, codes and regulations in every jurisdiction in which the Group operates. This Code shall be interpreted and applied in accordance with the prevailing laws of the relevant jurisdiction.

3. STANDARDS OF CONDUCT FOR DIRECTORS

- 3.1 In the performance of their duties, every Director shall uphold the principles and spirit of good corporate governance by adhering to the following standards of conduct:
 - (a) ***Understanding the Company's purpose and capabilities***
Have a clear understanding of the aims, purpose, capabilities and capacity of the Company and the Group;
 - (b) ***Commitment and diligence***
Devote sufficient time and effort to attend meetings, understand the Board's expectations, and discharge their responsibilities effectively;

- (c) **Effective oversight and control**
Ensure at all times that the Company is properly managed and effectively controlled;
- (d) **Awareness and compliance**
Remain well informed of the Company's operations, performance, and compliance with all relevant legislation, regulations and contractual obligations;
- (e) **Access to information**
Insist on being kept informed of all matters significantly affecting the Company, in order to perform their oversight and decision-making duties effectively;
- (f) **Responsible directorship**
Limit the number of directorships held to a manageable level, ensuring the ability to devote adequate time and attention to each role;
- (g) **Support and guidance from the Company Secretary**
Have unrestricted access to the advice and services of the Company Secretary, who is responsible to the Board for ensuring that proper procedures, rules and regulations are observed;
- (h) **Proper exercise of power**
At all times exercise powers conferred on them only for their intended purpose, and always in the best interest of the Company and its stakeholders;
- (i) **Disclosure of interest**
Promptly disclose any direct or indirect contractual or personal interest in the Group, so as to avoid any actual or perceived conflict of interest;
- (j) **Avoidance of misuse of position or information**
Refrain from diverting to personal advantage any business opportunity pursued by the Group, and from using confidential information gained through their position for the personal benefit of themselves or others;
- (k) **Integrity and good faith**
Act at all times in utmost good faith towards the Company, exercising powers honestly, responsibly and in the best interests of the Company and its shareholders;
- (l) **Independent judgment**
Exercise sound and independent judgment and, where necessary, express views or oppose proposals that may be detrimental to the interests of the Company and its shareholders; and
- (m) **Relationship with stakeholders**
Be mindful of the interests of the Group's shareholders, employees, creditors, customers and other stakeholders, and at all times promote professionalism and continuous improvement in the competency and integrity of the Group's management and employees, and ensure that adequate safety measures and proper protection are provided to employees and workers at the workplace.

4. CONFIDENTIALITY OF INFORMATION

- 4.1 Confidential information may constitute "insider information", referring to material, non-public information about the Company or the Group. Information is "material" where it is sufficiently significant that it could reasonably be expected to influence the investment decisions of shareholders or potential investors, including decisions on whether to buy, sell or hold the Company's securities.

- 4.2 Directors must exercise utmost caution in handling confidential and price-sensitive information, particularly internal information that has not been disclosed to the public or that could affect the Company's business operations or share price. The following guidelines apply:
- (a) ***Prohibition of personal use***
Directors shall not use any information obtained in the course of their duties for personal gain, or to engage in any business or activity that may compete with the Company;
 - (b) ***Restrictions on dealing and disclosure***
Directors must not use material non-public information to trade, directly or indirectly, in the Company's securities, and must refrain from dealing in the Company's shares during sensitive or blackout periods prescribed under any moratorium policy in force from time to time. Directors must not divulge any insider information to any third party for the purpose of dealing in the Company's shares; and
 - (c) ***Confidentiality obligations***
Directors must maintain strict confidentiality over all proprietary or business-sensitive information and must not disclose such information to any unauthorised person or competitor, even after ceasing to serve on the Board.
- 4.3 Any uncertainty as to whether particular information is material or non-public should be resolved by consulting the Board or the Company Secretary, who may seek further advice from legal counsel or regulatory advisers as appropriate.

5. SOCIAL RESPONSIBILITY AND THE ENVIRONMENT ("ESG")

- 5.1 In respect of ESG matters, the Board must:
- (a) ensure that appropriate steps are taken, in accordance with applicable law, to wind up or strike off the Company from the register if it has not commenced business, or has ceased operations and is unlikely to commence business in future;
 - (b) maintain an objective, cooperative and constructive approach in dealing with government authorities, regulators and other relevant stakeholders, for the common good;
 - (c) be socially responsible and support meaningful initiatives in community development, education and healthcare, while actively promoting environmental preservation;
 - (d) promote the effective and sustainable use of natural resources, and improve quality of life through the adoption and implementation of corporate social responsibility ("CSR") initiatives;
 - (e) be proactive to community needs and contribute to society-related programmes aligned with the Group's mission, values and sustainability aspirations; and
 - (f) ensure that all business activities and operations of the Company are conducted responsibly and do not harm the interests and well-being of society at large.

6. ANTI-CORRUPTION PRACTICES

- 6.1 Sound corporate governance and ethical business conduct are fundamental to the Group's long-term success and its ability to enhance stakeholder value sustainably. The Board and each Director share responsibility for upholding the Group's reputation for integrity in all aspects of its operations.
- 6.2 The Group is firmly committed to conducting its business in a fair, honest and transparent manner, consistent with its zero-tolerance stance against all forms of bribery and corruption.

Directors must not, directly or indirectly, engage in or condone any corrupt practice or act of bribery intended to secure an improper advantage for the Group or any individual.

7. GIFTS, GRATUITIES AND ENTERTAINMENT

- 7.1 Directors must not solicit or accept any gift, hospitality, favour or benefit that could reasonably be perceived to influence their objectivity or decision-making in the discharge of their duties.
- 7.2 Directors must not accept preferential treatment from individuals or organisations that do business, or seek to do business, with the Company, as such conduct may create a sense of obligation or the perception of compromised integrity.
- 7.3 All Directors are expected to exercise sound judgment and adhere to the Group's Anti-Bribery and Anti-Corruption Policy ("ABAC Policy") when dealing with gifts, entertainment or hospitality, ensuring that any acceptance or provision of such items is lawful, modest and properly recorded.

8. INSIDER TRADING

- 8.1 Insider trading — the use or disclosure of price-sensitive, non-public information for personal gain or the benefit of others — is strictly prohibited by law.
- 8.2 Directors who have access to confidential or price-sensitive information must fully comply with all relevant laws and regulations, including those prescribed by the Securities Commission Malaysia and Bursa Malaysia Securities Berhad ("Bursa Securities"), and other applicable laws in respect of trading in the Company's securities.
- 8.3 All dealings in the Company's securities must be conducted with integrity and transparency, and strictly in accordance with prescribed trading windows, moratoriums and disclosure requirements.

9. CONFLICT OF INTEREST

- 9.1 The Company has established a clear policy on conflicts of interest and related party transactions applicable to all Directors, as follows:
 - (a) **Avoidance of conflicts**
Directors must avoid entering into any transaction or arrangement that could give rise to, or be perceived as giving rise to, a conflict of interest with the Company;
 - (b) **Transactions with the Company**
In exceptional cases where a transaction involving a Director is deemed necessary for the benefit of the Company, such transaction shall be conducted as though it were an arm's-length transaction with an unrelated third party. The transaction must be fully disclosed and approved by the Board in advance, and the interested Director shall abstain from participating in the deliberation and approval process;
 - (c) **Compliance with Listing Requirements**
Where a transaction falls within the definition of a Related Party Transaction under the Listing Requirements, Directors must ensure strict compliance with all relevant disclosure and approval requirements applicable to listed companies;
 - (d) **Conflicting interests in other businesses**
Directors must promptly notify the Board in writing if they, or their immediate family members, hold a direct or indirect interest, or become shareholders, partners or office bearers, in any business that competes, or could reasonably be perceived to compete, with the Company's business or interests; and

(e) External appointments

Should a Director accept any appointment or position (for example, as a director, partner, adviser or participant) in another company or business organisation, it must not create any actual, potential or perceived conflict with the Company's business or the Director's responsibilities to the Company.

- 9.2 It may not always be possible to identify every situation that constitutes a conflict of interest. Common sense, integrity and sound judgment should guide Directors in determining the appropriate course of action. In case of doubt, Directors should consult the Chairman of the Board, who may seek further advice or discuss the matter with the Board. Directors shall extend full cooperation in rectifying any situation in which a conflict of interest exists or is likely to exist.

10. PROTECTION AND PROPER USE OF COMPANY ASSETS

- 10.1 All Directors are expected to exercise their business judgment responsibly to safeguard and optimise the use of the Company's assets.
- 10.2 Company assets — whether tangible (such as property, equipment and funds) or intangible (such as proprietary information, trade secrets or intellectual property) — must be used solely for legitimate business purposes and not for the personal benefit of the Director or others.
- 10.3 Directors must ensure that the Company's assets are protected from loss, damage, misuse or theft, and are used efficiently and in the best interests of the Company and its shareholders.

11. WHISTLEBLOWING

- 11.1 The Board has implemented a formal Whistleblowing Policy to promote transparency, accountability and integrity across the Group.
- 11.2 A dedicated whistleblowing channel is established on the Company's website at www.ancomnylex.com, enabling Directors and other stakeholders to report, anonymously and confidentially, any concern or complaint relating to suspected illegal conduct, malpractice, or potential misconduct.
- 11.3 The Chairman of the Audit Committee is designated as the primary recipient of all whistleblowing reports and is responsible for overseeing their proper handling and investigation. The Chief Integrity Officer acts as the key contact for all whistleblowing matters and assists in administering, coordinating and monitoring the investigation process in accordance with the Whistleblowing Policy.
- 11.4 The Company is firmly committed to ensuring that whistleblowers who report concerns in good faith are protected from any form of retaliation, victimisation or discrimination.

12. WORKPLACE SEXUAL HARASSMENT

- 12.1 The Company is committed to maintaining a safe, respectful and professional workplace, free from all forms of sexual harassment. Sexual harassment will not be tolerated under any circumstances.
- 12.2 All employees, Directors and relevant stakeholders are required to comply with the Anti-Sexual Harassment Act 2022 and the applicable provisions relating to sexual harassment under the Employment Act 1955, including the employer's duty to prevent, address and manage sexual harassment in the workplace.

13. COMPLIANCE WITH LAWS

- 13.1 The Group is committed to conducting its business ethically, responsibly, and in full compliance with this Code, the Group's internal policies, and all applicable laws, rules and regulations.

- 13.2 All Directors have a continuing duty to remain informed of, and to familiarise themselves with, the laws and regulatory requirements relevant to their roles and responsibilities. In discharging their fiduciary duties, Directors must act with integrity, diligence and accountability, ensuring that all decisions and actions are made in the best interests of the Company and its stakeholders.

14. REVIEW AND PUBLICATION

- 14.1 This Code shall be reviewed at least once every three years, and whenever there is a material change in the applicable law, regulation or guidance, or in the circumstances of the Group. Any amendment is subject to the approval of the Board.
- 14.2 This Code shall be made available on the Company's website at www.ancomnylex.com.

DOCUMENT CONTROL

Document	Code of Conduct and Ethics
Owner	Remuneration & Nomination Committee
Approved by	Board of Directors
Date of approval	29 September 2026
Supersedes	Code of Conduct and Ethics dated 10 August 2023