

MOBILIA GROUP

Code of Conduct and Ethics

for Directors, Employees and Consultants and any
other person who represent the Mobilia Group

This Code of Conduct and Ethics (“the Code”) applies to all MOBILIA Holdings Berhad (“Mobilia”) directors, employees, consultant and any other person who represent the company (“Covered Parties”); as well as their subsidiaries. Mobilia and its subsidiaries are referred to herein collectively as the “Group”.

Purpose of the Code

The Code serves to emphasize the Group’s commitment to ethics and compliance with the law in its business operations. It provides a framework for all Covered Parties ensuring the observance to and compliance with the standards of integrity and behavior that the Group is committed to. However, the Code is not intended to be all-encompassing and there are areas in which the Group has developed and will develop specific detailed policies. The Code is to be read and applied in conjunction with existing rules and policies within the Group.

The Code can be supplemented or amended by the Board of Directors of Mobilia. All waivers of any provisions in the Code for any Covered Party may only be made by the Board of Directors of Mobilia. If a law of a country conflicts with the Code, the stricter of the law of the country and the Code shall prevail.

A. Compliance with the law and regulations

Making the Right Decision

Concern for what is right should be the first consideration in all business decisions and actions, and that includes compliance with the law and regulations. Never enter into any transaction or perform any task that could reasonably be considered legally suspect, even if it might be common practice in your country or area. If in any doubt at all, seek advice and direction from your superior or Human Resources department.

B. Personal Integrity

Criminal Record

If you are charged with, and/or found guilty of, a criminal offence, you must inform your Human Resources department, or your superior who will then consult with Human Resources Department. Certain employees subject to licensing requirements may also be required to report the situation to the applicable regulator. There may be employment consequences if you are charged or found guilty of an offence.

Gifts and Entertainment

You may not accept, offer or give gifts, entertainment or other benefits (referred to as “gifts” in this section) having more than nominal value from or to existing or potential customers, suppliers, employees or others doing or seeking to do business with Mobilia. Further, you must never solicit gifts of any size at any time.

Gifts of nominal value may be accepted, offered or given provided they:

- Are not in cash or readily convertible to cash (such as securities, cheques or money orders);
- Are consistent with accepted business practice;
- Cannot be construed as an attempt to influence, or as a form of payment for a particular transaction or a referral;

- Do not contravene any law and would not compromise your integrity or that of Mobilia (or, in circumstances where you are offering or giving the gift, the integrity of the recipient or their organization); and
- Would not adversely affect your reputation or the reputation of Mobilia if knowledge of the gift was to become public.

If you have any doubt about whether a gift is of nominal value or may otherwise be accepted, offered or given, you must seek guidance from your superior or Human Resources department.

C. Alcohol and Substance Abuse

Mobilia is committed to providing a work and business environment that is free of alcohol and drug abuse.

The following conduct is prohibited:

- Consuming alcoholic beverages in quantities that affect work performance or impair your judgment during working hours;
- Consuming, possessing, selling or distributing illegal substances, especially while in Mobilia's premises, at any Mobilia's function, or at any time when you could be identified as a Mobilia employee.

D. Harassment, Discrimination and Violence in the Workplace

Mobilia is committed to conducting all its affairs with fairness and equity, and this includes the treatment of employees, shareholders, customers, suppliers and competitors. Any behaviour that could be construed as harassment or discrimination on any ground protected by human or civil rights law will not be condoned. Similarly, violence of any kind in the workplace, at a Mobilia's event or in the presence of or directed towards any employee, customer or supplier will not be tolerated. Any employee who engages in, or threatens to engage in any violence, will be subject to serious disciplinary action.

E. Use of the Internet, Email and Electronic Media

Knowingly transmitting, viewing, generating, printing, retrieving, downloading or storing any communication of a discriminatory, defamatory, obscene, damaging (such as viruses), threatening or harassing nature, or any material that is inappropriate for the business environment (such as sexually oriented literature or pictures, or chain letters), is prohibited. You are also prohibited from disclosing confidential or proprietary information about or belonging to Mobilia for any purpose that is illegal, against company policy or contrary to the best interests of Mobilia.

F. Dealing with MOBILIA Assets

You must make every effort to protect all Mobilia's property and assets from harm, loss or misuse, especially those that are in your custody or control and are your responsibility. These may include cash, negotiable instruments such as drafts, money orders, securities or certificates, premises, equipment, bank records, customer or employee information, or computer resources and information systems. They also include all information between Mobilia and its customers, employees or business partners, which must be kept secure from third parties. Should you become aware of any actual or potential harm, loss or misuse of Mobilia's property, you must

immediately notify your superior or other appropriate company official. Mobilia's property may be used only for the purpose of executing your accountabilities with Mobilia.

G. Conflict of Interest

Mobilia is committed to proactively detecting and disclosing any conflict-of-interest situations, and provides a measure to eliminate or mitigate them. To prevent a conflict of interest, any Mobilia employee must be vigilant and adopt appropriate behaviour in situations in which the objectivity of business decision may be impaired, especially in:

- External commitments
- Personal relationships
- Receiving an item of value

H. Channel to Report

The employees shall report any practices or actions believed to be inappropriate under the Code to their superior and the Head of Human Resources Department. Covered Parties and other stakeholders shall whistleblow such genuine concerns, in confidence, by using whistleblowing procedure via Whistleblowing Policy as published in the Group's corporate website.

All genuine complaints shall be properly investigated, and no individual shall be retaliated or incriminated for making such reports in good faith.

I. Insider Trading

All non-public information about the Group should be considered confidential information. Covered Parties who have access to confidential information about the Group are not permitted to use or share that information for trading purposes.

Adopted by Board on: 28 May 2020

Updated and adopted by Board on: 13 April 2023