



**KIMLUN CORPORATION
BERHAD
(867077-X)**

**CORPORATE CODE OF
CONDUCT**

This Corporate Code Of Conduct (“Code”) sets out the standards which the directors, officers and employees (“Personnel”) of Kimlun Corporation Berhad and its subsidiaries (“**KIMLUN Group**”) are expected to comply in relation to the affairs of KIMLUN Group’s businesses when dealing with each other, shareholders and the broader community.

This Code is intended to focus on areas of ethical risk, provide guidance to Personnel to help them to recognize and deal with ethical issues, provide mechanisms to report unethical conduct, and help to foster a culture of honesty, integrity and accountability.

The nature of this Code is not meant to cover all possible situations that may occur. It is designed to provide a frame of reference against which to measure any activities. Personnel should seek guidance from the appropriate level of senior management when they are in doubt about the proper course of action in a given situation, as it is the ultimate responsibility of each Personnel to “do the right thing”, a responsibility that cannot be delegated.

Personnel should always be guided by the following basic principles:

1. avoid any conduct that could damage or risk KIMLUN Group or its reputation;
2. act legally and honestly;
3. put KIMLUN Group’s interests ahead of personal or other interests.

Compliance

1. Personnel must comply with all applicable laws, rules and regulations.
2. Additionally, Personnel shall adhere to internal rules and regulations as they apply in a given situation. Those internal rules are specific to Kimlun Group and may go beyond what is required by the law.
3. Where necessary, KIMLUN Group may seek legal advice for the Personnel.

Conflicts of Interest

1. A conflict of Interest occurs when personal interests of a Personnel or his related parties compete with the interests of KIMLUN Group. Related parties in relation to a person shall means his family members or any enterprise in which he or/and his family members directly or indirectly has substantial financial interest.
2. Conflicts of interest are to be avoided, and any actual or potential conflict is to be reported to the Group CEO or the Chairman of the Audit Committee.

Personnel must not exploit their position with KIMLUN Group for personal gain. Personnel must declare to the Group CEO or the Chairman of the Audit Committee his or/and his family member's significant ownership interest in any enterprise which may compromise loyalty to KIMLUN Group.

3. Personnel have a duty to bring business opportunities identified through the use of KIMLUN Group's property, information or position to the attention of KIMLUN Group.

Confidential Information

Unless required by law or duly authorized by a member of the Board of Directors of the relevant company within KIMLUN Group, Personnel shall not disclose confidential information or commercially sensitive information, or allow such disclosure. This obligation continues beyond the termination of employment. Furthermore, Personnel must use best efforts to avoid unintentional disclosure.

In case that third parties, such as joint venture partners, suppliers or customers, share with KIMLUN Group their confidential information, such information shall be treated with the same care as if it was KIMLUN Group's confidential information.

Confidential information includes all non-public information that might be of use to competitors, or harmful to KIMLUN Group or the parties from whom KIMLUN Group received the confidential information, if disclosed. Examples of confidential information includes but not limited to trade secrets, marketing and pricing strategy, engineering and manufacturing ideas, designs, salary information, any non-published financial and any information which would be apparent to a reasonable person that such information is of a confidential or proprietary nature.

Fair Dealing

All dealings with customers, suppliers, competitors, employees and other stakeholders of KIMLUN Group are to be conducted with honesty, integrity and objectivity, striving at all times to enhance the reputation and performance of KIMLUN Group.

Company assets and property

All assets of KIMLUN Group are to be properly used in the interest of KIMLUN Group and for legitimate business purposes and must be safeguarded from loss and misuse. These obligations cover both tangible and intangible assets, including trademarks, know-how and confidential or proprietary information.

Knowledge and Information

1. The accuracy, use and handling of information are critical to KIMLUN Group's integrity and reputation.
2. Personnel must ensure that information are recorded by them honestly and accurately.
3. Personnel must never make improper use of knowledge, information, documents or other company resources obtained in the course of employment with KIMLUN Group. Personnel must respect the confidentiality and observe the privacy information about KIMLUN Group, its customers and fellow Personnel.
4. Personnel must use computer facilities appropriately. Unauthorised use, manipulation or other interference will be treated seriously.

Fighting Corruption and Unethical Practices

KIMLUN Group is committed to conduct business in an honest and ethical manner, takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all business dealings and relationships, wherever it operates, and to implementing and enforcing effective systems to counter bribery.

Kimlun Group will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which it operates and also adhere to the Guidelines on Adequate Procedures pursuant to Subsection (5) of Section 17A under the Malaysian Anti-Corruption Commission (Amendment) Act 2018.

Personnel shall be guided by Kimlun Group's Anti-Bribery And Corruption Policy and various internal guidelines developed thereunder on the standard of behaviour to which they must adhere to and how to recognize and deal with bribery and corruption issues, to ensure that Kimlun Group's business is conducted in an ethical manner with integrity and honesty.

Employment practices

KIMLUN Group subscribes to good employment practices, specifically:

1. All employment practices are fair and non-discriminatory;
2. All forms of discrimination and harassment are prohibited; and
3. All privacy rights of individuals associated with KIMLUN Group are to be respected.

Reporting of Illegal or Unethical Behaviour

1. Personnel should promote ethical behaviour and talk to his manager or other appropriate personnel when in doubt of the best course of action in a particular situation.
2. Personnel should raise concerns in good faith about any issue or suspicious of malpractice through the mechanism set out in Kimlun Group's Whistle Blowing Policy.