

KEYFIELD INTERNATIONAL BERHAD

Registration No. 202001038989 (1395310-M)

(Incorporated in Malaysia)

CODE OF CONDUCT AND BUSINESS ETHICS

A code of conduct to guide the Directors and any other employees at executive level and above (hereinafter referred as “employees”) of KEYFIELD INTERNATIONAL BERHAD (“Keyfield” or “the Company”) and its subsidiaries (“Keyfield Group” or “Group”) as to the practices necessary to maintain confidence in the Company’s integrity and the responsibility and accountability of individuals for reporting and investigating reports of unethical practices shall be outlined in the letter of appointment.

The Board aims to ensure that all Directors and any other employees act with the utmost integrity and objectivity, striving at all times to enhance the reputation and performance of the Company.

1. POLICY ON SHARE TRADING

As a general policy, all Directors and employees of the Group are discouraged from engaging in speculative trading (as opposed to investing) in the Company’s listed securities, and are reminded to observe the prohibitions imposed on “insiders” in relation to Insider Trading under the Capital Markets and Services Act 2007.

All Directors and key management personnel, the Chief Executive who is not a director, Chief Financial Officer or any other employee of the Company or its major subsidiary respectively who has access or is privy to price-sensitive information (“designated key management personnel”) are required to comply with Bursa Malaysia Securities Berhad’s Listing Requirements on Dealings in Listed Securities under Chapter 14.

The designated key management personnel must notify the Chief Executive Officer / Chief Financial Officer in writing of any dealing in securities of the Company within 3 market days from the date of trading.

All Directors and designated key management personnel are prohibited from dealing in the Company’s listed securities when they possess material inside information* which has not been made known to the investing public.

* Material Inside information is information which is reasonably expected to have a material effect on:

- the price, value or market activity of the Company’s listed securities, or
- the decision of a holder of the Company’s securities or an investor in determining his choice of action.

2. ANTI-BRIBERY AND CORRUPTION POLICY

The Company recognises that over and above the commission of any crime, any involvement in bribery will reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- Setting out a clear Anti Bribery and Corruption Policy (refer to Appendix A);
- Increase awareness of employees so that they can recognise and avoid bribery by themselves and others;

- Encouraging its employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution; and
- Taking firm and vigorous action against any individual(s) involved in bribery.

Appropriate disciplinary action shall be taken against the employee who does not act according to the policy. The prevention, detection and reporting of bribery or corruption is the responsibility of all persons within the Company.

3. CONFLICT OF INTEREST

While the Company has no wish to interfere in any employee's outside activities, the Company has a policy prohibiting conflicts of interest as follows:

a) Holding a Significant Interest in Suppliers, Customers or Competitors

The Company's policies require that employees (and their immediate family, spouses and family living in the same household) not have any ownership interests in, or own property with, any of the Company's suppliers, contractors, agencies, customers, or competitors (or their office employees) unless the Company determines that such ownership interests does not conflict with the employee's obligations to the Company. These restrictions do not apply to ownership of shares of a public listed company.

b) Outside Work

The Company has a policy requiring that employees not to work for, or conduct any outside business with a competitor. Employees may not be engaged in any manner by a competitor of the Company.

In order to determine whether an employee's investments or activities create a conflict, each employee is required to inform outside businesses and ownership interests which relate to the business activities of the Company. This information shall be furnished to Human Resource & Administration Department.

This Code of Conduct and Business Ethics was approved and adopted by the Board on 22 February 2021.