

LIKEI LOGISTIC SERVICES BERHAD

Registration No. 202101036465 (1436765-X)
(Incorporated in Malaysia)

CODE OF ETHICS AND CONDUCT

LIKEI LOGISTIC SERVICES BERHAD (“**the Company**”) and its subsidiaries (“**the Group**”) are committed to complying with all relevant laws, rules and regulations applicable to the business activities including the Anti-Money Laundering and Anti-Terrorism Financing Act 2001, Malaysian Anti-Corruption Commission Act 2018, Personal Data Protection Act 2010, and Competition Act 2010.

This Code of Ethics and Conduct (“**this Code**”) is founded on the principles of integrity, transparency, accountability and corporate social responsibility. It applies to all Directors, key senior management and employees of the Group.

OBJECTIVE

This Code aims to enhance corporate governance and ethical behaviour by:-

- Establishing clear guidelines on expected ethical behaviour and conduct of all Directors, key senior management and employees of the Group emphasising trustworthiness, honesty, integrity and values that can be accepted or upheld by any one person.
- Promoting a culture of responsibility and social accountability in line with applicable laws, regulations and best practices.

All Directors, key senior management and employees are expect to:

Corporate Governance

- i. Understand the Group’s goals, purpose, capabilities, and capacities, while promoting self-discipline and ethical behaviour.
- ii. Stay informed about the Group’s operations and compliance with applicable laws, rules and regulations across jurisdictions.
- iii. Avoid diverting business opportunity for personal gain or misusing confidential information.
- iv. Act in the best interest of the Group and with utmost good faith.
- v. Prevent abuse of power and authority.
- vi. Proactively report unethical behaviour through the Group’s Whistleblowing Policy and Anti-Bribery and Corruption Policy.

Relationship with Stakeholder

- i. Exercise caution and due care to safeguard the interest of shareholders, employees, creditors and customers.
- ii. Promote professionalism and continually enhance the competency of all personnel.
- iii. Ensure a safe workplace with effective occupational health and safety practices aligned with the Group’s operations.

Social Responsibility and Environment

- i. Use natural resources responsibly and promote sustainability to improve quality of life.
- ii. Ensure that the Group's operations do not harm society or the environment.

CODE OF ETHICS AND CONDUCT

1. PERSONAL CONDUCT AT WORKPLACE

1.1 Practice of proper conduct within and outside of the workplace

Professional conduct is expected from all Directors, key senior management and employees of the Group, within and outside of the workplace.

1.2 Equal Opportunity

Discrimination based on race, colour, age, gender, ethnicity, disability, pregnancy, religion, political affiliation, or marital status is strictly prohibited.

1.2 Working hours

Work hours must comply with statutory labour law.

1.3 Wages and Benefits

All Directors, key senior management and employees shall receive fair wages and benefits in accordance with legal standards.

1.4 Humane Treatment

No form of harassment, abuse, or coercion is tolerated.

1.5 Open Communication

Two-way communication is encouraged to promote teamwork, problem-solving and idea-sharing.

1.6 Continuous Development

The Group supports continuous learning and development to enhance employee skills and capabilities.

2. SERVE OUR CUSTOMERS

2.1 Integrity

The Group aims to deliver high-quality, competitive services with integrity and professionalism.

2.2 Competency

The Group only serves customers whom the Group competent to serve and who meet ethical standard.

2.3 Assets

Customer assets, including intellectual property, must be used in responsibly and lawfully.

3. AVOIDING CONFLICT OF INTEREST

A conflict of interest arises when personal interest interferes with professional responsibilities. All Directors, key senior management and employees must:

- Avoid actual or perceived conflicts of interest; and
- Adhere strictly to the Group's **Conflict of Interest Policy**.

3.1 Business Integrity

The Group enforces a zero-tolerance policy toward bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes). Compliance with anti-corruption laws **and the Group's Anti-Bribery and Corruption Policy** is mandatory.

3.2 No Improper Advantage

Do not offer or accept bribes. Gifts exceeding RM1,000.00 in value should be declined unless prior approval is obtained.

3.3 Disclosure of Information

All business and financial information must be disclosed transparently and in line with regulatory standards.

3.4 Fair Business and Competition

The Group is committed to ethical business practices and the protection of customer data, while promoting a fair and competitive marketplace.

4. PRESERVE CONFIDENTIALITY AND PRIVACY

All Directors, key senior management and employees must safeguard confidential information and only use it for authorised purposes. Disclosure is permitted only with appropriate consent or as required by law.

Confidential information includes, but is not limited to, non-public business strategies, financial data, customer and supplier information, intellectual property, internal communications, and any personal data relating to employees, clients, or third parties.

All confidential information must be protected in accordance with applicable data protection laws and internal policies, including but not limited to the Personal Data Protection Act 2010 ("**PDPA**") or any relevant data privacy regulations. Such information must not be disclosed without appropriate consent or unless required by law.

5. INSIDER TRADING

All Directors, key senior management and employees who have access to non-public and price-sensitive information must not engage in trading or disclose such information unlawfully. All activities must comply with relevant securities laws.

Non-public and price-sensitive information refers to important company details that are not yet public but could potentially affect the stock price and investment decisions of investors if disclosed. Examples include, but is not limited to, unreleased financial results, upcoming mergers or acquisitions, major contracts, changes in key management, regulatory approvals, legal issues, or financial difficulties. Using such confidential information to trade company shares before it is made public is considered insider trading and is illegal.

All Directors, key senior management and employees should not disclose non-public and price sensitive information to anyone outside of the Group, including family members and friends.

All Directors, key senior management and employees should not deal in securities of the Company nor influence any third party in dealing with the securities while all Directors, key senior management and employees have non-public and price-sensitive information about the Group.

In addition, all Directors, key senior management and employees are not permitted to engage in activities that are designed to hedge or offset any decrease in the market value of the Group's securities.

6. ANTI-MONEY LAUNDERING

"Money laundering" is the process by which persons or Groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate.

All Directors, key senior management and employees are strictly prohibited from engaging in any form of money laundering. Failure to comply may result in criminal liability.

7. HEALTH AND SAFETY

The Group is committed to providing a safe workplace and upholding occupational health and safety standards appropriate to the nature of its business operations. In return, all Directors, key senior management and employees are expected to understand and comply with the Company's policies and procedures.

8. BULLYING AND SEXUAL HARASSMENT

Bullying and/or sexual harassment by any Director, key senior management or employees is strictly prohibited. The Group is committed to maintaining a work environment that is free from all forms of bullying and/or sexual harassment.

Any questions or concerns regarding such matters should be directed to the immediate superior, head of department or key senior management. All reports and complaints will be handled with the strictest confidentiality.

9. BREACH OF TRUST

All Directors, key senior management and employees must not engage in any conduct that breaches the trust and confidence placed in them, including the misuse or abuse of the Group's assets or funds.

10. NO ABUSE OF AUTHORITY OR POWER

Abuse of authority or power refers to the improper use of one's position to influence or control others, particularly when a superior imposes their will on a subordinate to gain personal benefits or achieve objectives that violate laws, rules, or regulations.

All Directors, key senior management and employees are expected to treat others with respect in all interactions, especially when dealing within the Group.

11. CORPORATE CITIZENSHIP

All Directors, key senior management and employees must:

- 11.1 Operate responsibly and ethically, respecting local laws, customs and community values.
- 11.2 Minimise environmental impact and adopt sustainable practices.
- 11.3 Support charitable, educational and community service initiatives.

12. REPORTING CHANNEL

If in doubt, all employees are encouraged to seek guidance from the appropriate level of management.

Any suspected violations may be reported anonymously in accordance with the Group's **Whistleblowing Policy**. Retaliation against the whistleblower is strictly prohibited and protection is provided under the Whistleblower Protection Act 2010.

REVIEW OF THIS CODE

This Code of Conduct shall be reviewed by the Board periodically, and at least once every three (3) years, to ensure it remains relevant and aligned with legal, regulatory and industry developments.

This Code of Ethics and Conduct was approved by the Board on 12 August 2025.