

ANCOM LOGISTICS BERHAD [Registration No.: 196601000150 (6614-W)] (Incorporated in Malaysia)	Date of Revised Statement	29 July 2026
	Approved by the Board of Directors	29 September 2026
	Supersedes	Code of Conduct And Ethics dated 10 August 2023

CODE OF CONDUCT AND ETHICS

1. INTRODUCTION

The Board of Directors (“Board”) of Ancom Logistics Berhad (“ALB” or “Company”) is committed to upholding high standards of business conduct and fostering a corporate culture grounded in integrity, transparency and fairness throughout the Company.

Through the Code of Conduct and Ethics (“Code”), the Board sets the tone and governance standards for ALB and its subsidiaries (collectively, the “Group”). It is the duty and responsibility of every Director to be guided by the policies and procedure outlined in this Code and to understand clearly what constitutes acceptable behaviour and practices within the Group.

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.

For the purpose of this Code, any reference to the Company shall also mean the Group, wherever applicable.

2. PURPOSE

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.

While this Code offers guiding principles, it cannot anticipate every possible situation that may arise. Directors are expected to exercise sound judgment and act ethically at all times. Directors who are uncertain about how a specific situation relates to the provisions of this Code should consult the Chairman of the Board, who may consult with internal or external legal counsel as appropriate.

3. SCOPE

This Code applies to all Directors of the Company and its subsidiaries, save for the subsidiaries that are listed, as such entities may already have (or may subsequently adopt) their own Code of Conduct and Ethics. All Directors are required to comply with all applicable laws, rules, codes, and regulations in every jurisdiction where the Group operates. This Code shall be interpreted and applied in accordance with the prevailing laws of the relevant jurisdiction.

4. DIRECTORS' CODE

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 Purposes 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 significant matters 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 or as limit by the Bursa Securities requirements of max 5 listed company directorships, 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 proper procedures, rules and regulations are observed;
- h. **Proper Exercise of Power**
At all times exercise powers conferred upon them only for their intended purposes and always in the best interest of the Company and its stakeholders;
- i. **Disclosure of Interest**
Promptly disclose any direct and indirect contractual or personal interest with the Group to avoid 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 or from using confidential information gained through their position for personal benefits or that of others;
- k. **Integrity and Good Faith**
Act at all times with the utmost good faith towards the company and the Group 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 interest of the Company and its shareholders; and

m. Relationship with Stakeholders

- (i) Be mindful of the interest of the Group's shareholders, employees, creditors and customers and other stakeholders;
- (ii) At all times promote professionalism and continuous improvement in the competency and integrity of the Group's management and employees; and
- (iii) Ensure that adequate safety measures are in place and that proper protection is provided to employees and workers at the workplace.

5. CONFIDENTIALITY OF INFORMATION

Confidential information may constitute "insider information" which refers to material, non-public information about the company or the Group. Material information is information that is sufficiently significant such 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.

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 have an impact on the Company's business operations or its share price.

The guidelines are as follows:-

- a) **Prohibition of Personal Use**
Directors shall not use any information obtained in the course of duties for personal gain or to engage in any business or activities 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. They must also refrain from dealing in the Company's shares during sensitive periods or blackout periods as 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 shares of the Company; and
- c) **Confidential Obligations**
Directors must maintain strict confidentiality over all proprietary or business-sensitive information and must not disclose such information to any unauthorised person or competitors, even after they ceased to serve on the Board.

The information which is likely to be considered material (though not exhaustive) includes:

- Declaration of dividend;
- Financial results or earnings;
- Significant write-downs of assets or trade receivables;
- Expansion, curtailment or cessation of major operations;
- Corporate proposals or agreements relating to mergers, acquisitions, divestments or other major corporate exercises such as right issue or bonus issue;
- Introduction of new products or discoveries;
- Commencement or settlement of material litigation;
- Regulatory investigations;
- Liquidity or solvency issues; and
- Any other information shall not be disclosure during the Group voluntarily suspension of trading requested period.

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 advisors as appropriate.

6. SOCIAL RESPONSIBILITIES AND THE ENVIRONMENT (“ESG”)

In respect of ESG, the Board must:

- Ensure that appropriate steps are taken in accordance with the applicable law to wind up or strike off the Company Register if the Company has not commenced business or has ceased operations and is unlikely to commence business in the future;
- Maintain an objective, cooperative, and constructive approach when dealing with government authorities, regulators, and other relevant stakeholders for the common good;
- Be socially responsible and support meaningful initiatives in the areas of community development, education, and healthcare, while actively promoting environmental preservation;
- Promote the effective and sustainable use of natural resources and improve the quality of life through the adoption and implementation of corporate social responsibility (“CSR”) initiatives;
- Be proactive to community needs and contribute to n society-related programmes that align with the Group’s mission, values and sustainability aspirations; and
- Ensure that all business activities and the operations of the Company are conducted responsibly and do not harm the interest and well-being of society at large.

7. ANTI-CORRUPTION PRACTICES

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 the responsibility of upholding the Group’s reputation for integrity in all aspects of its operations.

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 which aligns with the Group’s Anti Bribery and Anti-Corruption Policy. 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.

8. GIFTS, GRATUITIES AND ENTERTAINMENT

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.

Similarly, Directors must not accept any preferential treatment from individuals or organisations that do business with, or seek to do business with, the Company, as such conduct may create a sense of obligation or the perception of compromised integrity.

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.

9. INSIDER TRADING

Insider trading – which involves the use or disclosure of price-sensitive, non-public information for personal gain or benefit of others, is strictly prohibited by law.

Directors who have access to confidential or price sensitive information must fully comply with all relevant laws and regulation, including those prescribed by the Securities Commission and Bursa Malaysia Securities Berhad (“Bursa Securities”), and other applicable laws in respect of trading in securities of the Company.

All dealing in the Company’s securities must be conducted with integrity and transparency, and strictly in accordance with the prescribed trading windows, moratoriums, and disclosure requirements.

10. CONFLICT-OF-INTEREST

The Company has established a clear policy on conflict-of-interests and related party transactions 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 situation 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**
If a transaction falls within the definition of a Related Party Transaction under the Listing Requirements, the Directors must ensure strictly 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 compete with, or could reasonably be perceived to compete with, the Company’s business or interests;
- e) **External Appointments**
Should a Director accept any appointment or position (e.g. as a director, partner, advisor 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 direct responsibilities in the Company.

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

11. PROTECTION AND PROPER USE OF COMPANY ASSETS

All Directors are expected to exercise their business judgement responsibly to safeguard and optimise the use of the Company’s assets.

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 personal benefit or that of others.

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.

12. WHISTLEBLOWING

The Board has implemented a formal Whistleblowing Policy to promote transparency, accountability, and integrity across the Group.

A dedicated Whistleblowing Channel has been established on the Company's website at www.ancomlogistics.com.my to enable Directors and other stakeholders to anonymously and confidentially report any concerns or complaints relating to suspected illegal conduct, malpractice, or potential misconduct.

The Chairman of the Audit Committee has been 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 person for all whistleblowing matters and will assist in administering, coordinating, and monitoring the investigation process in accordance with the Whistleblowing Policy.

The Company is firmly committed to ensuring that all whistleblowers who report concerns in good faith are protected from any form of retaliation, victimisation, or discrimination.

Any dealing in the Company's securities must be conducted with integrity and transparency, and strictly in accordance with the prescribed trading windows, moratoriums, and disclosure requirements.

13. WORKPLACE SEXUAL HARASSMENT

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.

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 at the workplace.

For the purposes of this Code of Conduct, *sexual harassment* refers to any unwanted conduct of a sexual nature, whether verbal, non-verbal, visual, physical or psychological, which has the purpose or effect of violating a person's dignity or creating an offending, humiliating, intimidating or creating a hostile or uncomfortable working environment, or which interferes with an individual's dignity or work performance.

Employees and other affected persons to all relevant stakeholders are encouraged to report any incidents of sexual harassment through the Company's established reporting or grievance channels. All complaints will be handled confidentially, promptly and impartially, and without fear of retaliation.

Any individual found to have committed sexual harassment or to have retaliated against a complainant will be subject to disciplinary action, which may include dismissal or termination of engagement, without prejudice to any civil, criminal or regulatory action that may be taken under applicable laws.

14. COMPLIANCE WITH LAWS

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. All Directors have a continuing duty to remain informed of, and 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.

15. REVIEW AND PUBLICATION OF THE CODE

The Board shall publish the Code in the Company's website at www.ancomlogistics.com.my.

The Board shall review the Code at least once every three (3) years and make such amendments as may be necessary to ensure that it remains relevant, effective and consistent with the Board's objectives, the Company's needs, corporate governance best practices and applicable laws and regulations.

Changes to the Code shall be subject to the approval of the Board.