



Code of Conduct and Ethics

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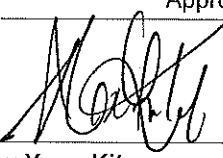
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REVISION HISTORY

Rev.	Effective Date	Description of Changes
0	9/05/2025	New Issue

	Prepared By	Approved By
Signature		
Name	Thean Yain Peng	Liew Yoon Kit
Designation	Chief Financial Officer	Non-Independent Non-Executive Chairman

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1. PURPOSE

- a) The Board of Directors of LAC Med Berhad and its group of subsidiary companies ("LAC Group" or "the Group") considers it important that directors and employees understand the rules of conduct by which the Group operates and for which each of them is accountable, and the consequences of non-adherence to these rules. LAC Group has adopted this Code of Conduct and Ethics ("CoCE") which sets out the principles of conduct to guide employees and directors in carrying out their duties and responsibilities to the highest standards of personal and corporate integrity when dealing with the Group's competitors, customers, suppliers, other employees and other stakeholders.
- b) This CoCE therefore spells out the standards and rules of conduct by which all directors and employees should abide by and is applicable irrespective of the jurisdiction or legal entity through which the Group operates; and may be properly supplemented by country or business specific regulatory requirements. These rules of conduct fall into the generic categories of:
- Employee Conduct – addresses standards of acceptable and unacceptable behaviour and personal decorum, as well as the Group's workplace harassment policies.
 - Business Conduct – addresses standards of ethical business behaviour including anti-corruption, the offering and receiving of gifts, hospitality and promotional expenditures, dealings with Third Party Associates as well as conflict of interests.
- c) Under separate cover are the related policies for:
- Solicitations and Extortions Policy
 - Gifts and Hospitality Policy
 - Whistle-Blowing Policy
 - Anti-Corruption and Bribery Policy
 - Conflict of Interest Policy
 - Related Party Transactions Policy
 - Anti-Money Laundering Policy

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- o Personal Data Protection Act Policy

d) Any violation of the rules of conduct as described below constitutes misconduct and may result in disciplinary action taken against an employee. Employees are encouraged to report violations of this Code in accordance with the procedure set out in the Group Whistle-Blowing Policy. Any attempt to trace the identity of a whistle-blower as a form of retaliation against anyone making a good faith report tantamount to serious misconduct and must be avoided.

2. SCOPE

- a) These rules of conduct apply to all directors and employees (whether full or part time and permanent or temporary) of the Group.
- b) Employees should make known the rules of business conduct set out under paragraph 3.2 below to Third Party Associates (defined in paragraph 3.2.5(i) below).
- c) Paragraph 1(d) applies to all violations under this Code.

3. POLICY

Employee Conduct

- i. The policy is one of strict observance of all laws and regulations in all the countries in which the Group operates. All employees must always choose the course of highest integrity at all times, guided by the Group core values. Employees must understand that we care how results are achieved, not just that they are attained.
- ii. Employees must observe and comply with all Malaysia laws and regulations where the Company carries on business.
- iii. Employees must always act in the best interests of the company, must at all times act honestly and use reasonable care, skill, and diligence in the discharge of their duties and responsibilities.

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- iv. An employee should not place himself/herself in a position where their duty to the relevant Group and personal interests may be conflicted.
- v. Employees must employ the powers and assets that they are entrusted with for purposes authorised by the relevant Company.
- vi. Employees should at all times ensure the Company's physical and electronic assets, records and intellectual property are properly protected and safeguarded.
- vii. Employees should ensure that personal data that they come across in the course of their employment be treated with care and properly safeguarded.
- viii. An employee must not make improper use of any information acquired by virtue of his/her position to gain personal advantage for himself/herself or for any other person or to cause detriment to a Company.
- ix. Employees must not engage in any business or employment outside hours of work which may compete with any companies within the Group, potentially leading to any conflict of interests or is otherwise detrimental to the Group interests.
- x. An employee should cooperate with colleagues in a manner that promotes the efficient conduct of the Group business and understand and act on the basis that all employees share responsibility for supporting and adhering to the Group's goals and objectives.
- xi. An employee should not possess or use alcohol in the workplace and in any situation where behaviour or performance at work may be affected.
- xii. Employees must not possess or use recreational drugs in any situation, even in situations where use of recreational drugs is permitted under local laws.
- xiii. Employees should be responsible and accountable for their own actions when using social media and should at all times adhere to the Group's Cybersecurity guidelines.
- xiv. Employees should be cognisant of risks in their direct area of work and also their workplace settings and should immediately report any risks, hazards, or potential

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issues that may affect their department or business unit to their supervisor and/or inform the Safety Officers or Risk Officers.

- xv. Employees should regularly familiarise themselves with all required policies, operating standards or relevant procedural documents provided to them and any others that may be revised or made available in future.

Health Safety and Environment (HSE)

- Safety is of key priority to all employees and stakeholders. We must conduct our business in a manner that values and protects the safety of our employees, others involved in our operations, customers and the public. LAC Group strives to prevent all accidents, injuries and occupational illnesses through the active participation of all stakeholders. We are committed to protect the health and safety of our employees and to operate without any harm to people or the environment.
 - You are expected to follow LAC Group HSE policies, standards, systems and requirements at your workplace. Please ask your manager or the Safety Officers if you require assistance.
 - On Health & Safety, employees must observe the following:
 - Follow all HSE rules and procedures at the workplace.
 - Do not tamper with any safety device or equipment.
 - Only undertake work for which you are trained and qualified to perform.
 - Stop work if you deem it to be unsafe and report to your supervisor. Do not take undue risks.
 - Report any accident, injury, illness, or an unsafe condition to your supervisor. Do not assume others will do so.
 - Ensure your performance is not impaired by for e.g., lack of sleep, fatigue, drugs, or alcohol.
 - Be aware of what to do if any emergency breaks out in your workplace.
- 4) On Environment matters, play your part in tackling climate change and caring for our environment by reducing paper and energy consumption, minimising waste, and recycling as far as possible – Reduce, Reuse, Recycle.

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Workplace Harassment

- a) The Group prohibits discrimination on any basis, including any bias on the basis of ethnicity, sex, religious beliefs, nationality, age or any physical disability. Our aim is to provide a work environment that fosters mutual employee respect and to promote harmonious working relationships. To us, harassment creates an intimidating or hostile work environment, interferes with an individual's work performance and adversely affects an individual's employment and/or career progression opportunity.
- b) Forms of harassment include (but are not limited to) epithets, slurs, negative stereotyping, intimidating acts and the circulation, posting (inside or outside your work area) or e-mailing of written or graphic materials that show hostility towards individuals because of their ethnicity, sex, religious beliefs, nationality, age or physical disability.
- c) Sexual harassment constitutes workplace harassment and is strictly not tolerated in LAC Group. Sexual harassment includes (but is not limited to):
 - Offensive, sexually oriented verbal kidding, teasing or jokes
 - Repeated unwanted sexual advances, flirtations, or propositions
 - Graphic or degrading comments about an individual's appearance or sexual activity
 - Offensive physical contact such as patting, grabbing, pinching, or brushing against another's body

4. BUSINESS CONDUCT

The rules of business conduct set out below extend to all the Group business dealings and transactions in all countries in which they operate

1. **Ethical Conduct and Compliance with Laws:** LAC Group conducts business with integrity, fairly, impartially, ethically, properly and in compliance with all applicable laws and regulations. In conducting our business, integrity must underlie all relationships, including all our business relationships with customers, suppliers, communities, and employees. In

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this connection, employees must have the strength and fortitude to do what is right and ethical in difficult situations.

2. **Anti-Bribery and Corruption:** The anti-bribery and corruption policies and measures set out below are necessary to protect the business, resources and reputation of Group (to read in conjunction with the detail Anti-Bribery and Corruption Policy);

- Employees must under no circumstances offer, promise, give or authorise the giving, directly, indirectly or through third parties of any bribe, kickback, illicit payment, benefit in kind or any other advantage to a Government Official or Government Entity (as defined below), private sector customer, supplier, contractor, or any other person or entity, as an inducement or reward for an improper performance or non-performance of a function or activity. Facilitation payments (also referred to as grease payments; that is, payments or gifts made to a government or public official to speed up, or secure the performance of, a routine, governmental action which the official is already obliged to perform such as issuing permits, immigration controls, providing services or releasing goods held in customs) could also create bribery risks. Accordingly, employees must not make any facilitation payments on any companies of the Group on its behalf.
- Similarly, employees must not under any circumstances solicit or accept, directly or indirectly, any bribe, kickback, illicit payment, benefit in kind or any other advantage from any Government Official or Government Entity, customer, supplier, contractor, or any other person or entity that is intended to induce or reward an improper performance or non-performance of a function or activity.
- Employees must abide by the Solicitations and Extortions Policy which sets out in more detail the Group's position in respect of solicitations and extortions for bribes or improper payments.

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- **“Government Entity”** means any national, federal, state, provincial, county, municipal, local or foreign government, or other subdivision or agency thereof; any entity exercising executive, legislative, judicial, regulatory, taxing or administrative functions of or pertaining to government; any arbitrator or arbitral body or panel of competent jurisdiction; any public international organization (e.g., the United Nations, the International Monetary Fund, the World Bank); and any entity owned or controlled, in whole or in part, by any national or local government (e.g., a state-owned or state-controlled communications company).
 - **“Government Official”** means any elected or appointed official of a Government Entity of any country; representatives or employees of a Government Entity at any level, including customs, immigration, and transportation workers; military personnel; representatives of political parties; candidates for political office; directors, managers or employees of state-owned or controlled entities; and any entity hired by a Government Entity for any purpose.
3. **Gifts and Hospitality:** While it is recognized that the giving or receiving of gifts and hospitality may help in the building of business relationships, good judgement must be exercised at all times. The offer and receipt of gifts or hospitality must be avoided whenever they could affect or be perceived to affect the outcome of business transactions or dealings or are not reasonable and bona fide. Employees should avoid giving or receiving gifts or hospitality (including entertainment, meals, business travel, tickets to social, entertainment or sports events etc.) which is excessive in value, given too often, or leaves the employee or (as the case may be) the other person in a position of obligation or perceived obligation. Gifts or hospitality in the form of cash or cash equivalent are prohibited and must be avoided. Further details of the Group’s policy in respect of gifts and hospitality are set out under the Sponsorship, Gifts and Hospitality Policy.
4. **Donations and Contributions:** Donations, sponsorships, and contributions made on behalf of the Group must not be used as a front or subterfuge for

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bribery. They should only be made without expectation of business returns. When making any donation or contribution, the following must be adhered to:

- donations and contributions must always take place in a transparent manner and be documented;
- documentation must include recipient identity, purpose, reasons for donation / contribution;
- donations / contributions must comply with the laws of the country in which the donation is to be made;
- donations / contributions should be made to an organization, instead of any particular person, where possible;
- anonymous donations are prohibited;
- payments into private or personal bank accounts are prohibited.
- No donations or sponsorships may be made to any political party or politicians for any campaign and/or related purposes.
- Donations and Sponsorships must comply with the Group's approval processes and authorised levels of approval.

5. Dealing with Third Party Associates on the following:

- Third-Party Associates are individuals or entities (not owned or controlled by a Company) that provide services, or engage in business activities, on behalf of a Company. Such persons or entities include without limitation joint venture partners, members of a consortium, commercial agents, sales representatives, distributors, consultants, advisors, suppliers of services, contractors or sub-contractors, and any other service providers who act on behalf of a Group company in any way in connection with its business.
- The assistance and local knowledge of Third-Party Associates may be essential. However, to minimise the risk of fraud or corruption on their part, Third Party associates should be made aware of and, where relevant, adhere to LAC Group's rules of business conduct, and acknowledge acceptance and receipt in writing of the same.

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- c) It is vital that employees pay close attention to the Group's relationship with Third Party Associates. Each Third-Party Associate should be carefully selected and evaluated before being retained by the Group, and Third-Party Associates should be selected solely on the basis of merit. It is the responsibility of each employee to know the Third-Party Associates with whom the employee transacts business for or on behalf of the Group, and to understand what services each Third-Party Associate performs for the Group and such manner in which the Third-Party Associate performs them. Please refer to **Appendix A** hereto for the principles and processes regarding dealing with Third Party Associates.

6. Record keeping:

- i. For purposes of financial audits and so as to prevent improper payments being made, it is important that the books and records of each company within the Group contain full and accurate information about all transactions and expenditures incurred by that Company. The information documented should be such that it is possible to see exactly what was paid, to whom, the reason why it was paid, where it was paid (for example, from or to which accounts) and when. Attempts to create false or misleading records are prohibited.
- ii. Employees seeking approval for a payment must provide adequate supporting documentation in order for the payment to be authorised.

7. Conflict of Interest

- i. All employees must avoid any conflict between their own interests and the interests of LAC Group. This includes dealings with suppliers (including service providers), customers and other third parties.
- ii. Employees are required to declare to Human Resources (HR) immediately under any of the following circumstances:

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- Any immediate relationship with any member of the Board or Key Senior Management. In this regard, immediate relationships to refer to the Conflict-of-Interest Policy definitions.
- Any direct reporting relationships between the employee and his or her spouse or immediate family members, in instances where his or her spouse or immediate family members is also an employee of the Group.
- Any ownership interest (either direct or indirect) in any supplier, customer, or competitor of the Group, unless it is in a listed company for investment purposes only.
- Any representation as an officer, director, partner, consultant, representative, agent or advisor of a supplier, customer, or competitor of the Company, including if acting as a Company's nominee Director on the Board of supplier, customer, or other business associate.
- Any other activity that could potentially create conflict of interest.
- Conflict-of-Interests declarations are compulsory for all employees via e-submission of their declarations upon completion of their annual e-learning modules. HR will initiate this annual declaration exercise on or before November of each year.

- iii. HR, in consultation with the Head of Internal Audit and Risk Management, will review positive declarations of any conflicts of interests, and ensure that these are resolved or mitigated. Employees must recuse themselves from any decision-making where they might be or perceived to be subject to any conflict of interests.

4. REPORTING

Except to the extent prohibited by applicable law, employees are to report violations of this Code or applicable laws in accordance with the procedures set out in the Group Whistle-Blowing Policy. Appropriate disciplinary action, including suspension or

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termination of employment, will be taken in the event that an employee is found to have violated the rules of conduct set out in this Code.

5. REVIEW

Human Resources will regularly update this Code as applicable from time to time to ensure that LAC Group's businesses are carried out with integrity and in an ethical and proper manner, the interests of the Group are safeguarded, and a harmonious and ethical work environment is maintained for all employees.

7. QUERIES

Compliance training for employees will be periodically provided. Should you require clarification or have any queries in relation to the rules of conduct or any other matter relating to this Code, please contact HR at any time.

APPENDIX A

1. DEALING WITH THIRD PARTY ASSOCIATES

Retention or Authorisation of Third-Party Associates

The principles discussed below should be followed when retaining and/or authorising any Third-Party Associate to do any act on behalf of the Group.

Payments to Third Party Associates

Payments to Third Party Associates must be commercially reasonable and commensurate with the tasks they undertake. They may be paid by cheque or electronic transfer only, but never in cash.

All payments should be made pursuant to invoices, receipts or other documentation documenting services rendered in detail, and must be properly reflected in any of the Group's companies accounting books and records and financial statements.

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No payments may be made:

- in relation to services performed by Third Party Associates, to any party other than the Third-Party Associate, unless the Third-Party Associate is able to provide valid justification in writing as to why the Third-Party Associate requires payment to be made to such other party and such payment is approved in advance in writing by the Finance Manager; and
- to an account that is not in the Third-Party Associate's name, or to an account outside of the country in which the services are provided, or where the Third-Party Associate has its primary place of business, unless the Third-Party Associate is able to provide valid justification in writing as to why this is required and such payment is approved in advance in writing by the Finance Manager.

Commercial Terms with Third Party Associates

In addition to the commercial terms of any arrangement with a Third-Party Associate, the following guidelines for contracting with Third Party Associates should be followed in order to reduce risks that a Third-Party Associate will engage in improper conduct on behalf of the Company:

- employees should not enter into any oral agreements or arrangements with a Third-Party Associate; and
- written contracts with Third Party Associates must accurately reflect the substance of the agreement and include a description of the service(s) provided and the price, compensation, commission schedule, and/or bonuses, as well as a list of all bank accounts and bank account owners where any payments to the Third-Party Associate will be sent.

Anti-Bribery Representations and Warranties: The contract with a Third-Party Associate must also contain anti-corruption / anti-bribery provisions, including:

- **Anti-Bribery Representations and Warranties** from the Third-Party Associate;
- **Right to Terminate** if the Third-Party Associate breaches any of these representations and warranties; and
- **Right to Withhold** payment of any invoice (or part thereof) to the Third-Party Associate where there is a bona fide question or dispute as to the propriety of such invoice or

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the amount claimed, where the Third-Party Associate fails to provide adequate supporting documentation, or where there are reasonable grounds to suspect that the Third-Party Associate has breached any of these representations and warranties.

The contract with the Third-Party Associate should also contain provisions on the right to Audit. This is to allow the Group reasonable access to the Third-Party Associate's books and records (which the Third-Party Associate should maintain in accurate form) in order to be able to perform an audit, and that the Group must be allowed to exercise such right yearly and/or in the course of the ongoing business relationship.