

CEPATWAWASAN GROUP BERHAD

CODE OF CONDUCT AND ETHICS

PURPOSE AND SCOPE OF THE CODE

This Code of Conduct and Ethics (“Code”) applies to all employees and directors of Cepatwawasan Group Berhad (“Company”) and its subsidiaries (“Group”), including full-time or permanent employees, part-time employees, employees on probation, trainees and interns (“Employees”).

The Code has been approved by the Board of Directors. Updates or amendments to this Code may be made from time to time to be in line with any change in applicable laws and regulations, or changes to the Company’s vision and mission or other relevant factors. Employees will be informed of any update or amendment to the Code.

CODE OF CONDUCT AND ETHICS

1. COMMITMENT

An employee shall commit himself to ethical and lawful conduct, including proper use of authority.

An employee should at all time act with utmost good faith towards the Company in any transaction and to act honestly and responsibly in the exercise of his powers in discharging his duties.

2. CONFIDENTIALITY

An employee shall respect the confidentiality appropriate to issues of a sensitive nature and he/she shall not use the confidential information obtained by reason of his office for his/her own advantage or that of others.

An employee shall not, during his employment or thereafter, except in the proper course of his duties, divulge to any person and shall use his best endeavours to prevent the publication or disclosure of any trade secret, information concerning the business or finance of the Company, dealings, transactions or affairs which may come to his knowledge during or in the course of his employment.

3. CONFLICT OF INTEREST

An employee must avoid conflict of interest with respect to their fiduciary responsibility.

An employee must present un-conflicted loyalty to the interests of the Company and Group. This accountability supersedes any conflicting loyalty to advocacy or interest groups and membership on other boards or staff. It also supersedes the personal interest of any employee acting as a consumer of the Group’s services.

4. MONEY LAUNDERING

Employees should always ensure that they are conducting business with reputable customers, for legitimate business purposes and with legitimate funds. Employees need to be mindful of the risk of the Group's business being used for money laundering activities and if they suspect money laundering activities, they should report it to their Head of Department or the relevant person designated by the Company

5. BRIBERY AND CORRUPTION

The Group is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates and in implementing and enforcing effective systems to counter bribery and corruption.

6. INSIDER TRADING

Employees who are in possession of market sensitive information are not allowed to trade in securities of the Company if that information has not been made public. Employees are also prohibited from disclosing any non-public price sensitive information to any third party.

7. COMPLIANCE WITH LAWS

The Group will comply with all applicable laws and regulatory requirements. All the Directors and employees are expected to understand, act and comply with the laws, rules and regulations that are relevant to their work and duties.