ARVEX BERHAD

[Registration No. 202501045449 (1646857-P)]

CODE OF CONDUCT AND ETHICS

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1.0 PURPOSE AND SCOPE

Arvex Berhad (the "Arvex" or the "Company") and its subsidiaries (collectively, "**Arvex Group**"), is committed to maintaining a high standard of code of conduct and business ethics. The value of integrity is the cornerstone of this Code of Conduct and Ethics ("**Code**").

This Code sets out the principles to guide standards of professional behaviour and business conduct when Employees deal with a third party. In this context, third party refers to any individual or organisation the Employee comes into contact with during the course of his/her work, and includes actual and potential customers, competitors, suppliers, contractors, distributors, business contacts/partners, agents, advisers, regulators, government and public bodies and officials, shareholders, investors, the environment and the community in which Arvex Group operates in.

This Code applies to all board of directors, executive officers, members of management, regular employees and contractual employees having employment relationships with Arvex Group, as well as temporary staff and seconded employees working under the control and supervision of Arvex Group ("**Employee(s)**").

This Code is not a comprehensive guide that covers every ethical situation Employees may encounter in their course of work. In any circumstance which is not covered by this Code or in case of any doubt, Employees shall refer to his or her Head of Department or Arvex Group's Head of Human Resource Department for clarification or guidance.

2.0 RESPONSIBILITY AND COMPLIANCE WITH THE CODE

It is the responsibility of every Employee to act in accordance with the policies, principles and guidelines detailed in this Code, and any update or amendment which may be issued from time to time by Arvex Group. It is also the Employees' responsibility to support the implementation of this Code.

Any violation or suspected violation of this Code shall be reported to the Chairman of the Board (in the case of any Director) or Arvex Group's Head of Human Resource Department or Employee's Head of Department (in all other cases) or such other officer designated by Arvex Group from time to time.

Non-compliance with this Code will be treated seriously and may result in disciplinary action, including the possibility of suspension or dismissal, and if warranted, legal proceedings against the Employees. Violation of applicable laws may subject Employees to civil and/or criminal penalties imposed by a governmental agency or a court, in addition to disciplinary action.

A. WORKPLACE ENVIRONMENT

3.0 WORKPLACE HEALTH AND SAFETY

Arvex Group is committed to providing a safe and healthy work environment to all Employees. Health and safety support and training will be provided to Employees so that they understand their occupational health and safety obligations and diligently comply with all health and safety requirements, policies and procedures set out by Arvex Group. Safety is everyone's responsibility.

The Company takes appropriate precautions to prevent injuries or adverse working conditions for each and every Employee. Employees are responsible for reporting injuries and unsafe work practices or conditions as soon as they are being discovered or become known.

4.0 HARRASSMENT, THREAT AND VIOLENCE

Arvex Group supports and respects human rights and seeks to provide a work environment where Employees are treated with respect and free from any form of harassment, threat, intimidation, violence or any other inappropriate behaviour.

Arvex Group views sexual harassment as a serious offence and appropriate action will be taken against any Employee found guilty of committing the offence.

Examples of sexual harassment:

- Jokes of a sexual nature;
- Touching or any bodily contact;
- Repeated requests for dates;
- Transmitting e-mails or pictures of a sexual nature; and
- Displaying picture, objects of a sexual nature.

Employees are responsible to report any harassment, intimidation, offensive or inappropriate behaviour to Arvex Group's Head of Human Resource Department. All complaints or grievances will be investigated, and appropriate action will be taken to stop such conduct and prevent future occurrences.

5.0 ENVIRONMENT

Arvex Group conducts operations in a manner that safeguards health, protects the environment and conserves valuable materials. The Company is committed to protecting the environment by minimizing and mitigating environmental impacts throughout the life cycle of operations. Employees should contribute to minimizing the use of finite resources, including energy, water and raw materials. Employees should minimize harmful emissions to environment, including waste, air emissions and discharges to water.

6.0 DRUGS, ALCOHOL AND PROHIBITED SUBSTANCES

Employees are expected to perform their job duties free from the influence of any substance that could impair job performance or pose unacceptable safety risk to the Employees or others. Arvex Group therefore prohibits working under the influence of alcohol, illegal drugs or

controlled substances. In addition, the use, possession, distribution or sale of alcohol, illegal drugs or other controlled substances in the workplace (other than for approved medicinal purposes) is strictly prohibited.

There may be company-sponsored events or functions where the serving of alcoholic beverages is permitted. In these cases, all appropriate liquor laws must be followed.

B. COMPANY INFORMATION, RECORDS AND ASSETS

7.0 USE AND CONTROL OF INFORMATION

Employees will use its IT resources effectively and efficiently to collect, store, control, use, protect and dispose of management, technological, personal and other useful information so that it can be properly and effectively used without jeopardizing confidentiality.

Recognizing the importance of protecting personal information, Employees will gather, store, control, use, process and dispose of personal information appropriately in compliance with relevant laws and regulations. Employees will also seek to prevent the loss, falsification, or leakage of such information.

8.0 PROTECTION AND USE OF COMPANY ASSETS AND RESOURCES

The Company's properties and assets should be managed and safeguarded in a manner which protects their values. Arvex Group provides its Employees a variety of resources and assets including licensed software for Employees to deliver their work.

Employees shall safeguard and make proper and efficient use of the assets and resources in compliance with all applicable laws, company policies and licensing agreements, and take all necessary steps to prevent loss, damage, misuse, theft, fraud or destruction of Arvex Group's assets and resources.

9.0 RECORDS, REPORTING AND INTERNAL CONTROLS

Arvex Group's records must be prepared accurately and honestly, both by accountants who prepare financial statements and by Employees who contribute to the creation of business records, for example, by submitting expense records, time sheets, order and invoice records. The Company takes obligation to maintain business records for operational, legal, financial, historical and other purposes seriously and takes appropriate steps to ensure that the content, context and structure of the records are reliable and authentic.

Reliable internal controls are critical for proper, complete and accurate accounting and financial reporting. Employees must understand the internal controls relevant to their positions and comply with the policies and procedures related to those controls to ensuring that effective and reliable business processes are in place.

Arvex Group has put in place a procedure which sets out the time period to retain and destroy data and records, based on the specific statutory and regulatory requirements. Employees are

responsible to retain and store proper records in compliance with company policy, legal and regulatory requirements.

10.0 PROPRIETARY AND CONFIDENTIAL INFORMATION

Employees are required to protect Arvex Group's confidential information and guard them against unauthorised disclosure or use. Employees are also required to protect confidential information of third party which Employees have access to in the course of their work.

Confidential information includes, but are not limited to, data and technical know-how, business plan and budget, product design, customer list and information, information on current and future projects and work processes, and any non-published financial or other data. Unless required by law or authorised by Arvex Group, Employees shall not make any unauthorized public statement, circulate, divulge or communicate with any customer, member of the public, media or government or statutory bodies on the policies or decision of the Company on any issue, or any other information or details in respect of the Company's business. This applies to disclosures by any medium, including the internet, especially via social media sites (e.g. Facebook, Twitter, YouTube), internet message boards and/ or blogs. All queries from the media or third parties about the Company's business must be directed to Investor Relations/Corporate Communication for a consistent and professional approach in the handling of such matters. This obligation continues both during and beyond the termination of employment.

Personal records and remuneration including the Employee's own remuneration are classified as Private and Confidential information and shall not be divulged.

C. DUTIES OF GOOD FAITH, DILIGENCE AND INTEGRITY

11.0 CONFLICT OF INTEREST

Employees have an obligation to act in the best interest of Arvex Group and are expected to give their fullest attention, dedication and efforts to their duties and the Company at all times. Employees are prohibited from using their position or knowledge gained directly or indirectly in the course of their duties and responsibilities or employment for private or personal advantage.

If an Employee at any time thinks that he or she may have a potential or actual conflict of interest, Employee is obliged to disclose the conflict promptly to the Chairman of the Board (in the case of any Director) or Arvex Group's Head of Human Resource Department or Employee's Head of Department (in all other cases) so that a determination can be made as to the existence and seriousness of an actual conflict. When in doubt, the Employee shall adopt the highest standard of conduct.

Employees must disclose and declare their interest via the "Conflict of Interest Declaration Form" as set out in Appendix 1, in the contemplated transaction or contract of any actual conflict of interest, potential conflict of interest or perceived conflict of interest.

Where the conflict of interest has been appropriately disclosed, the interested director shall be absent from participation in any discussion while the contract or proposed contract is being considered during the meeting and shall not vote on the contract or proposed contract.

Because a conflict of interest (actual or perceived) may be created, directors should not, generally, provide business or professional services of an ongoing nature to the Company. Notwithstanding the general rule, the Company is at liberty to:

i) For the purpose of a special assignment, engage the services of any director having special expertise in the particular field; or

ii) Engage the services of another member of a director's organization; so long as the terms of engagement are competitive, are clearly recorded and all legal requirements for disclosure of the engagement are properly observed.

This should be read in conjunction with the Conflict of Interest Policy of the Company.

12.0 ACCEPTING & PROVIDING GIFTS, ENTERTAIMENT, HOSPITALITY AND TRAVEL ("GEHT")

As a general rule, Employees are discouraged from giving or accepting gifts, entertainment or other benefits to or from its Business Associate who have business dealing with as it may compromise the integrities or affect professional judgement in discharging the full responsibilities to act in the best interest of the Company. Under no circumstances it is acceptable to offer, give, solicit, or receive any forms of bribe, kickback, facilitation payment or gratuities. Employees must not accept gifts if there is reason to believe that its purpose is to improperly influence business decisions or will conflict with the Company's interest and compliance with laws.

Notwithstanding this, Arvex Group recognises that the occasional acceptance or offer of modest gifts and entertainment may be a legitimate custom or practice in business relationships. The exception of the abovementioned no-gift rule applies to:-

(a) Occasional and modest entertainment in normal course of business; and
(b) Occasional and appropriate level of corporate hospitality.

The following guidelines shall be observed:

- Employees should not give or accept gifts or any other benefit or privilege that would in any way influence or appear to influence any business decision or gain an unfair advantage.
- The situation in which the GEHT is received or given should not be connected with contractual negotiations, tender awards or similar circumstances.

13.0 BRIBERY AND CORRUPTION

Arvex 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.

Employees shall familiarise themselves with the contents of the Anti-Bribery and Anti-Corruption Policy ("**ABAC Policy**") and shall not offer, give, solicit or accept bribes or any other improper payment in order to achieve any business or personal advantage or engage in

any transaction that can be construed as having contravened any applicable anti-bribery or anti-corruption laws. Any suspicions on violations of the ABAC Policy are to be raised through the available reporting channel under the Whistleblowing Policy and Procedures.

Employees shall also be cognisant of the fact that bribes may be in any form, monetary or otherwise including but are not limited to unauthorised remuneration such as referral fee, commission or other similar compensation, material goods, services, gifts, business amenities, premiums or discounts of an inappropriate value or of an unreasonable level or that are not generally offered to others or that are prohibited by law or may reasonably be viewed as having crossed the boundaries of ethical and lawful business practice.

Prior to giving or accepting any business amenity or other gifts (in whatever form or value), Employees shall assess the appropriateness of their actions by assessing if the action could influence or could reasonably give the appearance of influencing the business relationship of the Company with that organization or individual or any business decision arising out of that business relationship.

14.0 INSIDER TRADING

Employees who are in possession of market sensitive information of the Company or other listed company gained in the course of employment with the Company are not allowed to trade in securities of the Company or any securities of another listed company if that information has not been made public. Employees are also prohibited from disclosing any non-public price sensitive information to any person (including family members) where such information may be used by such person to his or her profit by trading or in recommending or advising others to trade in any securities of company.

15.0 COMPLIANCE WITH LAWS

Arvex Group is committed to doing business the right way, by acting ethically and consistently with this Code, its policies and all applicable laws, rules and regulations. Employees have a continuing obligation to familiarise themselves with applicable laws relating to their job responsibilities and Arvex Group policies.

16.0 ABUSE OF POWER

The abuse of authority/power is the improper use of a position of influence, power or authority by an individual towards others. Abuse of authority can include a one-time incident or a series of incidents.

Everyone in the Company should be treated with dignity and abuse of power and any form discrimination are strictly not tolerated. Employee shall report incidents of abusing of power, or has reason to believe abusing of power is occurring, to their immediate superior or adhere to the Whistleblowing Policy and Procedures.

17.0 MONEY LAUNDERING

Money laundering is the process of concealing, converting and transferring proceeds from unlawful activities to a legitimate source of income or asset. Money laundering is an offence under the Anti-Money Laundering and Anti-Terrorism Financing Act 2001 in Malaysia.

Employees are expected to be mindful of the risk of the Company's business being use for money laundering activities and to raise any suspicious transactions to their immediate superior and the Board to undertake further investigation. No disclosure should be made to others that would indicate suspicions of money laundering.

18.0 COMMUNICATION AND COMPLIANCE

The Company and the Board should ensure this Code is being communicated to all levels of Employees through staff handbook, notice board, intranet, or corporate website. The Company should include the briefing of this Code to new Employees in the induction programme. The Board should ensure this Code permeates throughout the Company and is complied by all levels of Employees.

19.0 WHISTLE BLOWER

Arvex Group has put in place a Whistleblowing Policy and Procedure to uphold the highest standards of professionalism, integrity and ethical behaviour in the conduct of its business and operations. The policy sets out procedures which enables Employees and members of the public to raise genuine concerns regarding actual or suspected unethical, unlawful, illegal, wrongful or other improper conduct and also sets out the process for managing any action, intimidation or harassment against a whistle blower.

20.0 PERIODIC REVIEW

The Code will be reviewed periodically by the Head of Human Resource Department and evaluated by the Risk Management Committee and updated as and when necessary to ensure that it continues to remain relevant and appropriate.

This Code of Conduct and Ethics has been approved and adopted by the Board on 28 August 2026.

Appendix I

CONFLICT OF INTEREST DECLARATION FORM

Name:

Email address:

Details of Conflict of Interest or Potential Conflict of Interest

(a) Description of conflict of interest or potential conflict of interest

(b) Nature and extent of such conflicts

(c) Impact / potential impact of such conflicts

(d) Measures taken to resolve, eliminate, or mitigate such conflicts