

UNITED ASIAPAC ENERGY BERHAD

[Registration No. 202401042682 (1588527-T)]
(Incorporated in Malaysia)

CODE OF CONDUCT AND ETHICS

Purposes

1. United Asiapac Energy Berhad (“**United AsiaPac**” or “**the Company**”) and its subsidiaries (“**the Group**”) are committed to conduct its business operations in a manner that is efficient, effective and fair. The Code of Conduct and Ethics (“**Code**”) shall apply to all Directors, officers and employees of the Group.
2. The purpose of the Code is to establish fundamental guiding principles and standards applicable to all Directors and all employees of the Group, based on high standards of professional and ethical practices. All Directors and employees shall always observe and ensure compliance with all applicable laws, rules and regulations to which they are bound to observe in the performance of their duties.

Compliance with Laws, Rules and Regulations

1. The Group operates in a highly regulated business environment and its activities are subject to local, state and federal laws, regulations and licensing conditions. All Directors and employees have a duty to act within these laws.
2. No Director or employee can be directed to carry out an illegal act, and no Director or employee can justify an illegal act by claiming to be acting under the order of a superior/senior management, or to be simply complying with a certain policy or instruction.

Human Rights

The Group supports and respects human rights. The Group treats all employees with dignity and respect in the workplace, promotes equal employment opportunities, fosters a safe and harmonious work environment, and refrains from any form of discrimination.

Health, Safety and Environment

1. The Group provides a work environment that is safe, secure and free of danger, harassment, intimidation, threats and violence. The Group takes appropriate precautions to prevent injuries or adverse working conditions for all employees by providing safe and conducive work environment.
2. Effective training and support will be provided by the Group to the employees to assist them in fulfilling their responsibilities in maintaining a safe workplace and minimising the environmental impacts of their activities.

Gifts and Prevention of Corruption

1. All employees are prohibited from giving or accepting gifts, entertainment and/or other benefits to or from business partners (including potential customers or suppliers).
2. Notwithstanding the above, the Group recognises that the occasional acceptance or offer of modest gifts and entertainment may be a legitimate contribution to a good business relationship. Please refer to the Group’s Anti-Bribery and Corruption Policy for occasional acceptance circumstances.
3. Prior to giving or accepting gifts, entertainment and/or other benefits (in whatever form or value),

employees shall assess the appropriateness of their actions by exercising proper care and judgement and apply the general principles in determining the appropriateness of the gift, in particular when dealing with public officials, bodies and/or authorities.

4. Employees are required to make declaration(s) to Human Resource Department/ Directors who will then decide whether to approve the acceptance of the gift or require the gift to be returned.

Professional Conduct

All employees must uphold the highest standards of professional conduct. Employees should, in all respect and at all times, conduct themselves with integrity, propriety and decorum, and must not under any circumstances, commit any act or omission that would bring damage to the Group, its property, reputation or general interests.

Employees are expected to have respect and tolerance for other cultures and religions different from their own, both locally and internationally, and shall conduct themselves in accordance with accepted standards of behaviour. The Group does not tolerate any form of abusive or coercive behaviour whether verbal or otherwise, physical violence or sexual harassment among its employees.

An employee who is in breach of the above Code of Conduct & Ethics will render himself / herself liable to disciplinary action. Stern disciplinary action will be taken against any employee for non-compliance of such laws, rules and procedures.

Confidentiality

1. All Directors and employees are required to exercise caution and due diligence to safeguard any information of a confidential nature relating to the Group which is acquired during their employment and are strictly prohibited to disclose to any person, unless the disclosure is duly authorised or legally mandated. It is the responsibility of the Company and individual employees to protect these information.
2. Employees shall not duplicate confidential documents or records without Management's approval except for file/record keeping within the Group. All classified information shall be securely stored or be disposed of in a manner that will not pose a security risk.

Conflict of Interest

1. The Directors and employees should avoid involving themselves in situations where there is real or apparent or potential conflict of interest between them as individuals and the interest of the Group. Directors and employees must not use their positions or knowledge gained directly or indirectly in the course of their duties or employment for private or personal advantage, whether directly or indirectly.
2. Employees of the Group must fulfill their responsibilities with loyalty and in the best interest of the Group. They should manage their personal and business affairs so as to avoid actual, potential or perceived conflict of interest with the Group, and promptly disclose any such actual, potential or perceived conflicting interests to the Group.
3. Any situation that involves, or may reasonably be expected to involve a conflict of interest must be disclosed promptly to the Management/ Human Resource Department so that a determination

can be made as to the existence and seriousness of an actual conflict; or in the case of a Director, to disclose the conflict to the fellow Board of Directors of the Company ("**Board**") members at the Board meeting of the Company or by notifying the Company Secretary. When the circumstances of the situation are permitted by the Management or the Board, it shall not be deemed a breach of this Code. When in doubt, employees shall adopt the highest standard of conduct.

Harassment & Abusive Language

1. The Group is committed to maintaining a work environment free of discrimination and harassment of any form. The Group will not tolerate any actions, words, jokes, or comments made by any employee that are based on, among others, individual's sex, race, religion, disability, and any other characteristics. This includes language used over the phone, via e-mail, or through other forms of communication.
2. Employees must refrain from using abusive or discriminating words, jokes, comments or gestures as well as acts which include touch the body of opposite sex unnecessarily and/or tease an employee of the other sex indecently.
3. The Company considers harassment and discrimination to be unjust and damaging to the Company's work environment. The Company encourages the prompt reporting of any acts or words of harassment, whether directed at the person making the report, or against another person. All complaints are taken seriously and are addressed through informal intervention or formal resolution procedures.
4. Disciplinary action will be taken in all cases where there is a finding of responsibility through a formal procedure.

Use of Company's Assets and Resources

1. All employees and the Board are responsible to protect the Company's assets. 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 the Group's assets and resources.
2. The types of assets that shall be protected are defined as, but not limited to:-
 - i. Physical Assets such as equipment, systems, facilities, inventories, supplies, etc. These shall be used only for conducting the Company's business or for purposes authorised by Management.
 - ii. Information and Communication Systems including connections to the internet shall be used for conducting the Company's business or for other incidental purposes authorised by the Management of the Company.
 - iii. Proprietary Information where all information (whether in written or spoken form and whether on paper or electronic form) relating to technical, product and services, financial data and projections, marketing strategies and business plans, organisational and employee information, decisions by the Company's Board, trade secrets, pricing guidelines, methodology or prices of products and services, profit sharing arrangements, customer information, databases, records and any non-published financial or other data that is not

public information. The Company's ownership of such proprietary information shall continue even after the employee leaves the Company.

- iv. Intellectual property rights including all ideas, inventions or copyright produced by employees as a result of the work performed for or on behalf of the Company during their employment. Employees must understand their responsibility to protect the Company's intellectual property and should seek advice from the relevant function/department when they have any doubts about their obligations in this area. The Company's ownership of such intellectual property shall continue even after the employee leaves the Company.
3. Employees are prohibited from using the Company's assets including equipment, resources, and proprietary information for any work unrelated to the Company. Additionally, employees are not allowed to perform non-Company-related work or solicit such business on the Company's premises or during working hours.
4. The computer network is the property of the Group and is intended for legitimate business purposes. Users are granted access to the computer network to assist them in performing their jobs. All users have a responsibility to use the Group's computer resources and the Internet in a professional, lawful and ethical manner.
5. Employees must protect their access credentials and not share them under any circumstances. Information must be classified according to their confidentiality and only handled, stored, and shared as prescribed. Employees should work on assigned hardware and approved software only and exercise caution when using email and the internet and avoid phishing exploits and malware. Employees shall consult the IT Department of the Group when in doubt on the right action to take on cyber security issues.
6. The Group will not tolerate any form of abuse of cyberspace. Directors or employees who have access to emails or internet access provided by the Group are required to use such services exclusively for work, business and matters of the Group. The use of such services for personal reasons is not permitted. The Group's computer network may not be used to disseminate, view or store commercial or personal advertisements, solicitations, promotions, destructive code (e.g., viruses, malware, Trojan horse programs, etc.) or any other unauthorised materials.

Violations of Code of Conduct

1. A breach of the Code shall be construed as misconduct and may be subjected to disciplinary action.
2. Any known or suspected illegal or unethical behaviour or misconduct should be reported to the immediate supervisor, their respective head of department or Head of Human Resource Department. Additionally, employees are encouraged to use the channels as set out in the Whistleblowing Policy without the fear of retaliation.
3. In line with Guidance 3.2 of the Malaysian Code on Corporate Governance 2021, the Board should encourage employees to report genuine concerns in relation to breach of a legal obligation (including negligence, criminal activity, breach of contract and breach of law), miscarriage of justice, danger to health and safety or to the environment and the cover-up of any of these in the workplace.

Review and Revision of the Code

1. This Code will be reviewed periodically or as and when required by the Board.
2. Document history is as tabulated:-

Version	Date of Board Approval	Implementation Date	Description
1	24 November 2025	24 November 2025	1 st version of Code
