



# PROPEL GLOBAL BERHAD

Registration No. 202001023868 (1380188-P)

## CORPORATE CODE OF CONDUCT AND ETHICS

<b>Reference No.</b>	CORP_CO001
<b>Version</b>	1.0
<b>Effective Date</b>	27 October 2022
<b>Document Owner</b>	Corporate Office/Group Compliance Officer

Please be informed that the proprietary rights (including the intellectual property rights) of the document belong to the Propel Global Berhad and no part of the document shall be reproduced or transmitted in any form or by any means to any third party, unless written consent has been duly obtained from the relevant document owner or head of documents custodian

## DOCUMENT CHANGE HISTORY

Version	Date	Summary of Changes	Approved By
1.0	27 Oct 2022	New	BOD of PGB

## APPLICABILITY

This document is applicable This Policy applies to all individuals working for the Group at all levels and grades. This includes employees, senior managers, managers and all individual working at all levels and grades (the “Employees”) and the Board (whether full time, part-time, contract or temporary) and any third parties associated with us.

## CAUTION

The details described in this document are not exhaustive to the extent of excluding the personnel from exercising good judgement and discretion.

However, all personnel must always bear in mind that the underlying principle is to always safeguard the company’ interest and to avoid occurrence of any financial loss and/or incidences which could adversely impact the Company’s good name and image.

## 1. INTRODUCTION

Our Corporate Code of Conduct and Ethics ("the Code") forms an integral part of our corporate governance framework and is part of our commitment to observe and adhere to high standards of corporate responsibility and conduct ourselves rightly.

## 2. OBJECTIVES

The Code applies to every employee at every level of Propel Global Berhad (PGB) and its subsidiaries ("collectively the Company"), as well as the directors. The Code is intended to provide guidance for behaving ethically and responsibly and never to be compromised for the sake of results.

## 3. OUR CONDUCT, YOUR RESPONSIBILITY

You are responsible for understanding the following the spirit and letter of the Code, as well as the Company policies and laws that apply to the work that you do. Incorporate the principles of the Code into your work. The Code and Company policies provide the information you need to perform your job ethically, responsibly and compliance with law.

- **We must act honestly and in good faith**

We have a duty of care and diligence in fulfilling the powers and functions of our roles. We should never engage in conduct that is likely to bring discredit upon the Company.

- **We must not disclose confidential information**

In the normal course of our employment at the Company, we may learn confidential information about the Company and/or whom it does business with. We must not use or disclose this confidential information to any party unless authorised to do so.

We should never use or share confidential information obtained for stock trading purposes or for any other purpose. All non-public information about the Company should be treated as confidential information.

- **We must make proper use of company assets**

Company assets are specifically provided to employees for use in the course of their work. Prior authorisation must be obtained before any asset is used outside the scope of an employee's course of work.

We are responsible for all Company property or documents issued to us. All such property and documents should be returned immediately upon request or upon termination of employment.

- **Business Records and Control**

Accurate, timely and reliable records are necessary to meet the Group's legal and financial obligations and to manage the affairs of the Group. All books, records and accounts shall conform to generally accepted and applicable accounting principles and to all applicable laws and regulations.

- **Health, safety and environment implications must be regarded before making any business decision**

We must ensure that our business decisions do not compromise our commitment, to avoid any injury to people or damage to the environment and ensuring we comply at all times with the appropriate laws.

The Company does not tolerate bullying, abuse, or any behaviour that interferes with someone's work or that creates a hostile or uncomfortable work environment. We have a responsibility to know what bullying and harassment are so we can report it promptly when we see it by providing this information to the Group Chief Executive Officer or Group Human Capital.

While at work or while attending business-related activities on or off Company premises, employees are strictly prohibited from manufacturing, possessing, storing, distributing, transferring, purchasing, selling, using or being under the influence of alcohol or illegal drug.

- **We must understand how company policies and procedures relate to our work**

We must be aware of company policies and procedures, and how the policies relate directly in the course of our work. This includes a working knowledge of the company and divisional delegations of authority, to ensure no employee exceeds their respective limits in committing the Company verbally or in writing.

- **We must avoid conflict of interests**

In instances where our personal interest conflicts with those of the Company, we must remove or manage the conflict so as to avoid loss to the Company or the Company's customers. Circumstances would include but not be limited to, the receipt of secret commissions or other payments not directly from the Company.

- **We must not involve in any corruption acts**

The Company has a strict zero-tolerance with corruption. All employees of the Company are expected to comply with the applicable corruption laws. Essentially, all employees are prohibited from:

- i. giving or promising or offering directly or indirectly to any person anything that could be regarded or considered or viewed as a gratification; or
- ii. soliciting or receiving or agreeing to receive directly or indirectly by himself or any other person; or
- iii. make or submit false, inaccurate, misleading or exaggerated records, invoices, claims with the intention to deceive the principal. Regardless whether for the benefit of that himself or of another person including his family. All employees are expected to report as soon as possible to the Chairman of Audit Committee or Chief of Internal Auditor if he/she knows or suspects a breach of any applicable

corruption laws. Failure to do so may lead to a sanction under the applicable laws. All employees are also expected to familiarise themselves with the Company's Anti-Bribery and Corruption Policies and act in accordance with them.

- **We must comply with all laws and regulations**

The Company takes seriously its obligations as a company to comply with all relevant laws and regulations affecting its business. All employees of the Company are expected to comply at all times with all laws and regulations relevant to their functions and tasks within the organisation. Employees should report any breaches of relevant laws or regulations to the Chairman of Audit Committee or Chief Internal Auditor for further action. The Company had on 25 May 2022 adopted the Whistle-blowing Policy. The Whistleblowing Policy is intended to provide protection for staff who raise concern in relation to irregular and unlawful practices.

- **We promote and maintain a culture of lawful and ethical behaviour**

The Company encourages all employees to react promptly in good faith, any violations or suspected violations of the Code.

#### **4. CONSEQUENCES OF BREACHING THE CODE**

Any employee who breaches the Code will face disciplinary action which, depending on the severity of the breach, could result in a dismissal or a legal action being initiated against the person, or both.

----- END -----