

ETHICS AND INTEGRITY POLICY

1. Introduction

ABLE-SPEED SDN BHD and its subsidiaries (“Able-Speed”) are committed to applying the highest standards of ethical conduct and integrity in its business activities. All Associated Persons must comply with this Ethics and Integrity Policy.

Able-Speed takes a zero-tolerance approach against all forms of bribery, corruption and unethical business approach and is committed to compliance with all applicable laws in relation to anti-bribery and corruption, advertising and competition. Any breach of the policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned.

2. Definitions

“**Associated Persons**” are partners, employees, directors of Able-Speed, including temporary, contract staff or interns, and such other parties engaged by Able-Speed or performing work or services for or on behalf of Able-Speed.

“**Bribery**” is the act of offering, promising, giving, receiving or soliciting of undue advantage/gratification of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), to/from a person in authority, in violation of applicable law, as an inducement or reward for a person to do or not to do an act in relation to the performance of that person’s duties. Bribery and corruption are closely related. However, corruption has a wider remit.

“**Gratification**” is defined to mean the following:

- a) money, donation & sponsorship, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
- b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- e) any forbearance to demand any money or money’s worth or valuable thing;
- f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and
- g) any offer, undertaking or promise, whether conditional or unconditional, of any Gratification within the meaning of any of the preceding paragraphs (a) to (f)

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“**Corruption**” is the abuse of entrusted power for private gain. In addition of giving or receiving ‘gratification’ as above, corruption may also include acts of extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.

“**Facilitation payments**” is a payment or other provision made personally to an individual in control of a process or decision. It is given to secure or expedite a routine or administrative duty or function.

“**Gifts**” can be in the form of goods or services, including anything that can be of value to the person receiving it.

“**Hospitality**” includes providing travel, transportation, lodging, as well as entertainment in the context of conventional, cultural and sporting events.

“**Kickback**” is a form of negotiated bribery in which a commission is paid to the bribe-taker in exchange for services rendered.

3. Solicitation, Bribery and Corruption

All Associated Persons are not permitted to pay, offer, accept or receive a bribe in any form. Associated Persons are strictly NOT allowed to:

- Offer, pay or give anything of value to any parties in order to obtain business or anything of benefit to Able-Speed.
- Act illegally including bribes, blackmail, inducements, secret commissions, other rewards and similar improper actions.
- Attempt to induce any parties to do something illegal, unethical and permit any parties to violate the rules.
- Give some advantage inconsistent with law and wrongful or unlawful use of official position to procure some benefit or personal gain.
- Corruptly give, promise or offer to any person gratification with the intent to secure business or an advantage for Able-Speed.
- Offer, give, receive or solicit, directly or indirectly, anything of value to influence improperly the actions of another party.

4. Facilitation Payments and Kickbacks

Associated Persons are prohibited from, directly or indirectly, accepting or obtaining or attempting to accept or obtain or offering or attempting to offer facilitation payments or kickbacks from/to any person for themselves or for any other person subject to this policy.

Facilitation payments and kickbacks do not necessarily involve cash or other financial asset, it may be in the form of any gratification with the intention to influence the recipients in carrying out their duties towards the payer’s advantage.

Able-Speed strictly prohibits accepting or giving, whether directly or indirectly, any Facilitation payments or kickbacks.

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5. Commissions, Discounts and Secret Profits

Associated Persons must not, directly or indirectly, receive or obtain, in respect of any goods or services purchased or other business transacted (whether or not by them) by or on behalf of Able-Speed, any discount, rebate, commission, service, interest, consideration of value or other benefit or payments of any kind (whether in cash or in kind) which is not authorised by Able-Speed's policies.

6. Gifts, Entertainment and Hospitality

Giving and receiving of all such gifts and entertainment must be exercised with good judgement, be for genuine purposes without the intention of creating any improper advantage, given in the ordinary course of business.

Hospitality may be offered and accepted as part of business networking as well as a measure of goodwill towards the recipients. All acts of hospitality must:

- be made in good faith and exercised with good judgement;
- not influence/implicate business decisions or trigger any prohibitions under law; and
- be in line with Able-Speed's Code of Conduct and all other policies of Able-Speed.

Each department shall ensure that all employees and directors are aware and adhere to the Able-Speed's Code of Conduct & this Policy.

7. Political Contributions

Able-Speed does not make or offer monetary or in-kind political contributions to political parties, political party officials or candidates for political office.

No Director or Employee shall make any political contribution on behalf of Able-Speed or use the Able-Speed's resources for the same purpose or use their position with the Able-Speed to try to influence other person to make political contributions.

8. Sponsorships and Donation

Providing funding or other support to third parties, such as through sponsorships and donations, may create a heightened risk if such support is provided – or may reasonably be perceived to be provided – in exchange for an improper business advantage. Accordingly, funding or support to third parties may only be provided if permitted by applicable laws, are of a reasonable value, made in direct support of a legitimate business purpose, and follows this Policy.

Funding or support to third parties may not be provided with the intent to obtain an improper business advantage for Able-Speed.

9. Fair Business Practice

Able-Speed operates within the principles laid down by the domestic and international rules put in place to protect free competition and therefore, in carrying out its business, operates by promoting

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fair competition. Able-Speed also recognize the importance and its responsibility to ensure that its business practices to fully comply with applicable Competition Law in Malaysia. Activities that might give rise to violations of laws and a breach of this policy include, but are not limited to, price fixing agreements, illegal boycotting of suppliers or clients, bid rigging, cartel conduct, predatory practices, exclusive dealing, misuse of market power, controlling the output or limiting the supply of goods and services, price fixing to eliminate a competitor, exchanging confidential information, etc.

10. Advertising and Marketing

Able-Speed are committed to responsible advertising and marketing of our products and services. Able-Speed adhere to all relevant advertising and marketing laws and guidelines applicable in the jurisdictions in which Able-Speed operate and follow high international standards. Advertising and marketing communications shall adhere to the following principles, and are not limited to:

- Accurate and truthful information
- No exaggerated environmental or social claims
- Marketing with care to vulnerable segments
- Observe fair competition
- Protect customer data and ensure privacy
- Ethical marketing channels
- Prioritise customer health and safety
- Transparent pricing and promotions
- Socially responsible

In the event that any unintentionally erroneous information is included in Able-Speed's marketing and advertising content, it will immediately be withdrawn and corrective statement shall be issued.

11. Confidentiality, Information Security, Proprietary Information and Intellectual Property

Able-Speed are committed to business information confidentiality, integrity and accessibility. Proprietary information includes all non-public information that might be harmful to the company or its customers, business partners if disclosed to unauthorised parties. All Associated Persons must handle any such information as secret. It also covers that, no one is entitled to trade with securities while in possession of non-public information or deliver non-public information to others that could have impact on the securities. Every rule ensuring information security must be followed all times.

Able-Speed respect the property rights of others. Able-Speed will not acquire or seek to acquire trade secrets or other proprietary or confidential information by improper means, also will not engage in unauthorized use, copying, distribution or alteration of software or other protected intellectual property.

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12. Conflicts of Interest

Conflicts of interest occurs when an individual or organization is involved in multiple interests, one of which could possibly corrupt, or be perceived to corrupt, the motivation for an act in another.

It is the responsibility of Able-Speed and all Associated Persons, that any ethical, legal, financial or other conflicts of interest be avoided and that any such conflicts (where they do arise) do not conflict with the obligations to Able-Speed. Able-Speed requires all Associated Persons to:

- Avoid any situation or activity that compromises, or may compromise, their judgement or ability to act in the best interest of Able-Speed.
- Avoid being in a position where their personal interests are in conflict (or could be in conflict) with the interests or business of Able-Speed.
- Avoid engaging in activities that will bring direct or indirect profit, commercial or business advantages to the Able-Speed's competitor.
- Avoid acting in ways that may compromise Able-Speed's legality.
- Identify and disclose any conflicts of interest

13. Reporting of Policy Violation

All Directors, Employees including Associated Persons, as well as Third Parties are encouraged to report any real and/or suspected unethical or integrity misbehaviour in accordance with the established Able-Speed's **Whistleblowing Policy**.

It is the Able-Speed's policy that all reports, complaints or disclosures made shall be kept strictly confidential. Anyone who makes a report, complaint or disclosure in good faith shall be protected from any retaliation and discrimination, regardless of the investigation outcome. However, filing groundless or malicious complaints is an abuse of this policy and will be treated as a violation.

Able-Speed reserves the right to report any action or activity suspected to be in criminal nature to the relevant authorities.

14. Policy Review

Able-Speed reserves the right to review and amend this Policy from time to time to ensure that it continues to remain relevant, adequate and up to date.

Any deviation or waiver from this Policy must be approved by Directors.

- signed -

CHU KUM WENG
(MANAGING DIRECTOR)

Date: 15 Jan 2025