ETHICS, INTEGRITY, AND RESPONSIBLE SOURCING POLICY

1. Purpose and Scope

Able-Speed Group is committed to maintaining high standards of ethical conduct, integrity, respect for human rights, and environmental responsibility. This Policy establishes a common framework for ethical business practices and responsible sourcing across Able-Speed entities in Malaysia (ASMY) and the Philippines (ASMPI).

This Policy applies to employees, management, directors, suppliers, contractors, and other business partners engaged with Able-Speed Group.

2. Policy Statement

2.1. Ethics & Integrity

2.1.1. Able-Speed takes a zero-tolerance approach to bribery, corruption, and unethical practices. Employees and relevant business partners are expected to comply with this Policy and applicable laws, as applicable to their respective roles and activities. All individuals are expected to act with honesty, fairness, and accountability in business operations.

2.2. Responsible Sourcing

2.2.1. Able-Speed expects suppliers and relevant business partners to uphold applicable standards relating to ethical business practices, human rights, and environmental responsibility.

2.3. Conflict Minerals

2.3.1. We are concerned about violence and human rights violations in the mining of certain minerals from the Democratic Republic of the Congo (DRC) and surrounding countries, as well as the social and environmental impacts of cobalt extraction.

2.4. Air Emissions

2.4.1. Relevant air emissions, including emissions associated with chemicals, aerosols, particulates, and other regulated substances, should be identified, monitored, and appropriately controlled in accordance with applicable requirements. Where applicable, ozone-depleting substances shall be managed in accordance with applicable legal and regulatory requirements.

3. Prohibited Conduct

Conduct prohibited under this Policy includes, but is not limited to:

- Bribery, corruption, fraud, or unethical practices, facilitation payments, kickbacks, or secret commissions.
- Discrimination, harassment, or retaliation.

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- Use or sourcing of conflict minerals without appropriate due diligence, where applicable to the relevant products, materials, or supply chain.
- Child labour, forced labour, or unsafe working conditions in the supply chain.
- Misuse of confidential information, insider trading, or intellectual property violations.
- Acceptance of gifts, entertainment, or hospitality without prior approval.

4. Implementation Activities

Able-Speed will:

- Require suppliers, where appropriate, to provide reasonable evidence of compliance with applicable legal and ethical requirements.
- Take appropriate corrective action, which may include termination of the business relationship, where suppliers are unwilling or unable to comply.
- Ensure employees sign an acknowledgment of the Code of Ethics and adhere to conduct standards.
- Communicate this Policy to relevant stakeholders through appropriate communication channels.
- Assess and, where appropriate, investigate concerns received from employees, suppliers, or business partners regarding potential violations of this Policy.

5. Confidentiality and Protection from Retaliation

Reports of misconduct or violations under this Policy will be treated confidentially and accessed only by authorized persons. Retaliation against individuals who raise concerns in good faith is strictly prohibited.

6. Roles and Responsibilities

- Employees and stakeholders are encouraged to raise concerns in good faith.
- Management and designated personnel shall take reasonable measures to maintain confidentiality, avoid conflicts of interest, and refer concerns to the appropriate process.
- Suppliers are expected to comply with this Policy as applicable to their business relationship with Able-Speed and subject to applicable contractual requirements.

7. Case Management and Records

Reports shall be managed in accordance with applicable laws, Group requirements, and the Investigation SOP. Records will be retained and disposed of in line with legal and company requirements.

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8. Compliance and Review

Violations of this Policy may result in corrective or disciplinary action. This Policy shall be reviewed periodically and updated when required by changes in legislation, business operations, or Group governance.

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