Code of Conduct

ETHICS • INTEGRITY • ACCOUNTABILITY
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Message From

Anwar Syahrin Abdul Ajib
Managing Director/Chief Executive Officer
UEM Sunrise brings together the talented and skilled, the imaginative and the courageous. We create sustainable environments loved by homeowners, acclaimed by investors and recognised by industry. We believe in being innovative and acting quickly to unlock potential; to thrive in a changing world.

Personally, I deliver my strongest commitment always when it comes to customer service, product quality, employee development, and shareholder value – and I expect the same of you. When we deliver the right results, it is because of the effort and dedication that we put in every day. Key to our performance in these areas is an equally strong commitment to doing business ethically and with integrity. UEM Sunrise’s reputation and continued success depend largely on our support – yours and mine – to this commitment. However, success is hollow if it is not achieved by doing what is right.

Being true to ethical and professional behaviour to set the highest standards of integrity, honesty and trust is not just a policy at UEM Sunrise – it is part of our deep-rooted values. The UEM Sunrise Code of Conduct, which has been adopted by our Board members, is the cornerstone of our culture and explains the principles that define our Company. I urge you to read, understand and appreciate the Code by pondering its true meaning. When you sign it, you are renewing your personal promise to me and to UEM Sunrise – a promise that in everything that you do, you will abide by the Code, with no exceptions.

If you have questions about the Code – or if you have concerns about possible ethical violations in the workplace – I urge you to immediately contact your line manager or Head of Department or raise your concerns through the available reporting channels. All communications will be treated confidentially and without retaliation.

Every Board member, Management and Employee, regardless of location or position in the Company, has an obligation to follow the values outlined in this Code of Conduct. We want everyone in UEM Sunrise to feel confident about our high ethical standards, our honesty, and our integrity, and that can only happen by living our values of embracing teamwork, integrity and passion with a focus on success. The UEM Sunrise Code of Conduct is a living document – your exemplary professionalism is what gives it life.
Vision

Building communities of the future with you and for you

To continuously provide infrastructure and related services that connect communities and improve their lives. We realise this by being a trusted provider of world-class products and service

Mission

UEM Sunrise brings together the talented and skilled, the imaginative and the courageous. We create sustainable environments loved by home owners, acclaimed by investors and recognised by industry. We believe in thinking big and acting quickly to unlock potential; to thrive in a changing world
Values

We are an ENTERPRISING entity that embraces TEAMWORK, INTEGRITY and PASSION with a focus on SUCCESS

Enterprising
We are enterprising and competitive with a mind-set geared towards creating greater value for our stakeholders

Teamwork
We practice teamwork, mutual respect, open communications and empowerment while embracing diversity and inclusiveness to foster internal and external collaborations

Integrity
We hold true to ethical and professional behaviour to set the highest standards of integrity, honesty and trust

Passion
We are passionate, driven, competent and committed to gain knowledge and improve skill sets to achieve personal growth and exceptional performance

Success
We achieve success by pushing boundaries, thinking creatively resulting with out-of-the-box innovative ideas and solutions
Structure and Key Components

Code of Conduct Revised 2019

In the workplace
- Work culture
- Conflict of interest

Regulations
- Anti-Competition
- Data Privacy & Protection
- Intellectual Property & Confidential Information
- Money Laundering & Terrorism Financing

Working with external stakeholders
- Bribery & Corruption
- Gifts & Hospitality
- Dealing with Government and Local Authorities
- Working with Business Partners
Our Code Of Conduct

Purpose
Our customers, business partners, communities, regulators and stakeholders expect us to be a reliable partner. Similarly, our entire business ecosystem is built on trust.

UEM Sunrise Code of Conduct (“The Code”) expresses our personal commitment to build this trust every day in our business ecosystem and it outlines ethical behaviour standards in our business activities.

Scope
The Code outlines ethical behaviour standards accompanied by important policy statements.

The Code explains employee responsibilities and the obligation to report any potential violations and cooperate in any investigation that may follow. Employees are required to read and annually sign that they have read the Code.

This document should be read in conjunction with the respective Code of Conduct Handbook and Code of Conduct for Business Partners as to embrace the spirit of our commitment to integrity and our same high ethical standards as set out in the Code of Conduct for Business Partners.

Applicability
The Code applies to Board members, Management and Employees of UEM Sunrise (“The Company”) and its subsidiaries. The Company will use its best efforts to ensure third parties, key stakeholders and business partners such as contractors, consultants, suppliers, agents, joint venture partners and other business partners including their employees, agents, representatives, suppliers, subcontractors and non-profit organisations to adhere to the Code. Any infringement of the Code will attract disciplinary action to be taken against the concerned Board members, Management and Employees.
In The Workplace
Work Culture

What we need to know & do

Enterprising
We understand and evaluate business/compliance risk and opportunity to ensure business sustainability

Teamwork
We respect each other and work as a team

Integrity
We choose to make ethical decisions and act with integrity. We are responsible for ensuring healthy and safe working conditions for all

Passion
We are passionate about doing the right thing, even when it is hard

Success
We respect diversity and we aim to celebrate our achievement together

What we need to watch out for or avoid

• Ignore business/compliance risk without taking appropriate measures to manage the risks

• Discrimination based on gender, race, disability, nationality, religion and/or age

• Unwelcome verbal, visual, psychological, physical or other conduct that are intimidating, offensive, abusive or hostile

• Non-compliance with laws, rules and regulations including, but not limited to, laws related to anti-corruption, competition, occupational health and safety, work rules and procedures, safety-related signs and safety equipment requirements, privacy and data protection, and any other prescribed laws

• Immoral behaviour and criminal activities such as gambling, indecency, obscenity, vulgarity, pornography, threats and violence as well as possession of illegal items

• Harmful or hazardous use of psychoactive substances including alcohol and illicit drugs that affects our health and productivity at work

• Make unethical decisions that disrupt operations and put the Company at risk

• Non-accountability for services rendered/goods provided and dishonour the commitment in the contract
We act in the best interest of the company, and we avoid any activities that might damage the reputation of the company. We declare promptly any interests that might be perceived as affecting our decision-making process.

**What we need to know & do**

- We operate and make business decisions in the best interest of the Company and we must avoid situations where there may be real, potential or perceived conflict of interest.
- A conflict of interest arises when the Company’s interests and our personal interests collide.
- Board members, Management and Employees must declare all such interests upon joining the Company, or as and when a potential conflict arises, on an annual basis based on calendar year i.e. 1 January and on a quarterly basis for shareholding disclosure.
- If we find ourselves in a situation of conflict before the annual declaration exercise, we must declare it in writing within 5 business days.
- We must abstain from participating in the Company’s decision-making process or involve in activities that are hindering us from acting in the best interest of the Company.

**What we need to watch out for or avoid**

- Use our position in the Company for personal advantage or financial interest.
- Make use of the Company’s confidential information for personal or pecuniary interest.
- Use our authority over an employee of the Company to gain undue advantage over a third party.
- Interested or engaged in activities which adversely interfere with the time and attention in performing our employment duties and responsibilities to act in the best interests of the Company.
- Own directly or indirectly, shares in any land, equipment or privately held business enterprises which derive any income, receive any payment from contractual or other business arrangements with the Company.
- Own directly or indirectly, a significant interest in any publicly held business enterprises which derive any income, receive any payment from contractual or other business arrangements with the Company, or competes directly with the Company.
- Involve directly or indirectly in the management or business activities of any publicly listed business enterprise or competitor without consent from the Company.
Regulations
We aim to compete fairly in the marketplace and we are committed to comply with competition laws everywhere we operate.

**What we need to know & do**
- We must seek competitive advantage through lawful means while driving the success of our business.
- Companies that are considered dominant should not abuse their position. We should put in place necessary procedures if our companies are viewed as dominant in a given market.
- We have a responsibility to understand and comply with Competition Act 2010 (Competition Act) and other relevant laws and regulations.

**What we need to watch out for or avoid**
- Enter into exclusive arrangements or non-competition agreements to prevent, restrict or distort competition in the market.
- Bid-rigging or boycotts.
- Directly or indirectly impose unfair purchase or selling price or other unfair trading condition on any supplier or customer.
- Refuse to supply to a particular company or group of companies.
- Discourage new market entry or expansion or investment by an existing competitor.
- Force an existing competitor from the market or seriously damage it, where the existing competitor is no less efficient than the dominant enterprise.
Data Privacy & Protection

We respect privacy and we take appropriate safeguards to protect personal data against unauthorised use or disclosure

What we need to know & do

• We respect privacy and protect Personal Data obtained with consent in the course of our business as required by the Personal Data Protection Act 2010 (PDPA)

• We must endeavour to keep Personal Data accurate and up to date

• We must ensure that we collect, use and retain Personal Data to only minimum amount necessary for business needs. Disclosure is only on a need-to-know basis

• In the event of transferring Personal Data to third parties, extra care and diligence must be taken to avoid risk of causing harm to individuals. Where consent is required under local laws, we must obtain consent for the purpose

• We must ensure all Personal Data is to be kept for any commercial requirements or regulatory compliances

What we need to watch out for or avoid

• Obtain, store, transfer or use Personal Data without a legitimate business purpose

• Non-compliance with the Personal Data laws requirements in transferring personal data to jurisdictions outside of Malaysia

• Unnecessary Personal Data not being shredded and destroyed

• Improper procedures in transmitting, processing or storing personal data in protected environments

• Leave personal, employee, customer and vendor data at a printer, on a shared server or on a publicly accessible site

• Disclose Personal Data to any unauthorised persons or organisations
Our investments in intellectual properties are valuable assets, and we actively protect our intellectual property. We respect the valid intellectual property and confidential information of our stakeholders in the business ecosystem.

**What we need to know & do**

- We are committed to protect our Intellectual Property ("IP") such as trademarks, copyrights, patents, trade secrets and other proprietary information.
- We respect the IP of our customers, business partners, competitors and other external parties.
- We must safeguard Confidential Information of the Company and we are only allowed to disclose the information to third parties who have signed non-disclosure agreements.
- We are committed to a clean desk culture and keep our working desks free from sensitive content at all times.
- At the end of working day and at known extended periods away from our working desks, we shall keep all Confidential Information in hardcopy or electronic secured.
- We abide by all applicable laws on insider trading and on securities market abuse.

**What we need to watch out for or avoid**

- Usage of devices or tools that are alleged to infringe the intellectual property of others.
- Give license, rights or access to our IP or other information without authorisation.
- Disclose, divulge or discuss Confidential Information of the Company with external parties or in public area, or on social media.
- Leave Confidential Information unattended, or unsecured including leaving Company’s laptop unsecured or unattended in office or in public areas.
- Share passwords with your colleagues or external parties.
- Involve in insider trading activity or use any non-public information of the Company obtained in the course of our duty for own benefit or for the benefit of others.
- Involve in spreading false information or engage in activities to manipulate the market.
Money Laundering & Terrorism Financing

Money laundering and terrorism financing are financial crimes with economic effects. We take appropriate measures for detecting and preventing money laundering and terrorism financing.

**What we need to know & do**

- We are committed to comply with Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 ("AMLATFA")
- We must conduct due diligence to understand the business and background of our business partners
- We do not aid in money laundering and terrorism financing activities

**What we need to watch out for or avoid**

- Red flags on the third parties’ reputation
- Third parties who are reluctant to provide detailed information about their businesses
- Inability to verify documents during the due diligence process
- False documentation provided by the third parties
- Suspicious transactions to/from locations of concern
- Unusual requests to split total payment in several separate transactions
- Transactions that are unusual and non-transparent
- Transactions that are not conducted on a face-to-face basis
- Recipients of funds are unclear and do not involve actual beneficial owners
- Large cash transactions
Working With External Stakeholders
It is our policy to conduct all of our businesses in an honest and ethical manner and we take a zero-tolerance approach to bribery and corruption.

**What we need to know & do**

- We develop business relationships free of corruption and bribery.
- We are committed in conducting our business in an open, transparent, honest and ethical manner.
- We and our Business Partners must comply with applicable anti-bribery and anti-corruption laws.
- We must not offer or accept bribes or kickbacks and must not participate in or facilitate corrupt activity.
- We do not allow facilitation payments to gain access, secure or expedite the performance of a routine function.
- The requirements of this section apply to all stakeholders.
- Report potential or actual bribery and corruption incidences to our line manager, Head of Governance, Risk & Compliance or People and Corporate Services Division.
- No employee will suffer demotion, penalty or other adverse consequences for refusing to pay bribes even if such refusal may result in the Company losing business.

**What we need to watch out for or avoid**

- Make or accept bribes either in the form of cash or non-cash as an inducement to gain any commercial, contractual, regulatory and/or personal advantages:
  - hospitality
  - entertainment
  - gifts such as branded accessories, jewellery, gadgets
  - holidays and travel packages
  - cruises
  - tickets to sporting events
  - shares/securities
  - debts write-off
  - special “discounts”
  - “massages terms & padding” of contracts
  - medical check-up at prestigious hospital
- Make facilitation payments as an incentive for relevant authorities to complete some action or process expeditiously.
- Offer business or employment opportunities for our personal benefits or for the benefit of third party prior to the awarding of contract.
Our business decisions should never be based on gifts and hospitality provided through our business relationships. We do not solicit or receive gifts and entertainment from any third party.

### What we need to know & do

- We are committed to a “No Gift Policy”. We do not accept or receive or offer or provide gifts.
- We and any of our immediate family members must not accept any form of gifts or favours or gratuities or kickbacks from current and potential vendors, contractors, suppliers, clients, or any other party.
- We may accept or offer:
  (i) reasonable hospitality such as business meals or refreshment provided during a business meeting with legitimate business reasons
  (ii) inexpensive token of appreciation after a presentation or speaking engagement
- The most senior person from the Company in presence shall pay for the business meals.

### What we need to watch out for or avoid

- Give or accept cash or any form of gifts.
- Accept lavish meals or entertainment or paid holiday from the current and potential vendors, contractors, suppliers, clients or government agencies.
- Accept personal services that may put ourselves in a position of conflict or influence our decision.
- Ask a representative, such as business partner, agent, or sub-contractor to give gifts, hospitality, or travel on our behalf.
- Accept or offer products/services at discounted rates that are not made available to the general public.
- Give donation for a charity or organisation to induce decisions in favour of our business.
Dealing With Government & Local Authorities

When interacting with the officers, we follow high ethical standards and act in a transparent manner while maintaining good working relationships.

What we need to know & do

• We strive to protect the Company’s interests through lawful and transparent advocacy with the government and local authorities.

• We comply with the applicable laws and regulations in all countries in which we operate.

• Employees can participate as individuals in the political process on their own accord, own volition, own time and with own resources. Political opinions are personal opinions and must not represent the Company.

• Those who wish to hold a position as an office bearer in any political party must disclose and obtain approval from the Company’s People and Corporate Services Division.

What we need to watch out for or avoid

• Not providing information to the officers when they have a right to such information in line with the local relevant laws and procedures.

• Provide donations to charities or organisations that may be afflicted with the officers.

• Pay facilitation fees for “fast” clearance of goods and services.

• Authorise a third party to make payment to expedite a service on our behalf.

• Non-compliance with the public procurement or tender process.

• Offer gifts, hospitality, entertainment or travel to the officers or their families beyond our policies and procedures.
We want to work with business partners who share our values and commitment in ethics and integrity and comply with our Policies and all applicable legal requirements.

- We conduct due diligence to understand the business and background of our business partners before agreeing to appointment.

- It is important that we choose to work or engage business partners who do not cause reputational damage to the Company.

- We are accountable for the works or services delivered by our business partners.

- Engage business partners implicated in bribery acts.

- Engage business partner without proper selection and due diligence process.

- Business partners that resist our standards and requirements, such as Code of Conduct, Anti-Corruption Statement, Health, Safety and Environment Policy.

- Business partners that do not address concerns, take corrective actions proactively or highlight audit findings in a timely manner.

- Business partners owned or controlled by government officials who claim that it can exert an improper influence over the decision making of the government and/or its officials.

- Make any misrepresentation with regard to the Company’s capabilities or products for the purpose of securing contracts or getting customers.
Raising Concerns

• You are obligated to raise a concern promptly should you become aware of a potential or suspected violation of the Code or any Policies or applicable laws and regulations

• Violations of our Code of Conduct erodes the trust we have built with our shareholders, customers and other stakeholders

• By raising concerns promptly, you are taking prompt action to tackle the causes of concern and manage reputational risk

• The Company will not tolerate any adverse action against an employee who raises a concern in good faith

• Any form of reprisal or retaliation will itself be regarded as serious misconduct
Reporting Channels

Talk to your line manager or Head of Department; or

Send a report through online Secured Postbox; or

Write to Whistleblowing Committee Chairman through online Direct Message

For more information on UEM Sunrise Whistleblowing Policy, visit whistleblower.uemsunrise.com