

ANALABS RESOURCES BERHAD

CODE OF CONDUCT

The Directors and Management of Analabs Resources Berhad and its group of companies (“the Group”) are committed to adhering to the best practice in corporate governance and observing the highest standards of integrity and behavior in activities conducted by the Group, including the interaction with its customers, suppliers, shareholders, employees and business partners.

All employees of the Group are expected to discharge their respective duties with highest level of integrity in line with the relevant laws and regulations and the Group’s policies, guidelines and best practices and failure to comply may result in the commencement of disciplinary proceedings that may lead to termination of employment and/or appointment.

Conflict of interest

The Group expects that employees will perform their duties conscientiously, honestly, and in accordance with the best interests of the Group. Employees must not use their positions or the knowledge gained as a result of their positions for private or personal advantage. Regardless of the circumstances, if employees sense that a course of action they have pursued, or are presently pursuing, or are contemplating pursuing may involve a conflict between their personal interests and interests of the Group, they should immediately communicate all the facts to their supervisor.

Group Funds and Other Assets

Employees who have access to Group funds in any form must follow the prescribed procedures for recording, handling, and protecting money as detailed in the Group’s policies and procedures or other explanatory materials, or both. The Group imposes strict standards to prevent fraud and dishonestly. If employees become aware of any evidence of fraud and dishonestly, they should immediately advise their supervisor or seek appropriate legal guidance so that the Group can promptly investigate further.

When an employee’s position requires spending Group funds or incurring any reimbursable personal expenses, that individual must use good judgment on the Group’s behalf to ensure that good value is received for every expenditure.

Group funds and all other assets of the Group are purposed for the Group only and not for personal benefit. This includes the personal use of organizational assets, such as computers.

Relationships with Clients and Suppliers

Employees should avoid investing in or acquiring a financial interest for their own accounts in any business organization that has a contractual relationship with the Group, or that provides goods or services, or both, to the Group if such investment or interest could influence or create the impression of influencing their decisions in the performance of their duties on behalf of the Group.

Kickbacks and Secret Commissions

Regarding the Group’s business activities, employees may not receive payment or compensation of any kind, except as authorised under the Group’s business and payroll policies. In particular, the Group strictly prohibits the acceptance of kickbacks and secret commissions from suppliers or others. Any breach of this rule will result in immediate termination and prosecution to the fullest extent of the law.

Group Records and Communications

Accurate and reliable records of many kinds are necessary to meet the Group's legal and financial obligations and to manage the affairs of the Group. The Group's books and records must reflect in an accurate and timely manner all business transactions. The employees responsible for accounting and record keeping must fully disclose and record all assets, liabilities, or both, and must exercise diligence in enforcing these requirements.

Employees must not make or engage in any false record or communication of any kind, whether internal or external, including but not limited to:

- False expense, attendance, production, financial, or similar reports and statements
- False advertising, deceptive marketing practices, or other misleading representations

Privacy and Confidentiality

When handling financial and personal information about customers or others with whom the Group has dealings, observe the following principles:

- Collect, use, and retain only the personal information necessary for the Group's business. Whenever possible, obtain any relevant information directly from the person concerned. Use only reputable and reliable sources to supplement this information.
- Retain information only for as long as necessary or as required by law. Protect the physical security of this information.
- Limit internal access to personal information to those with a legitimate business reason for seeking that information. Use only personal information for the purposes for which it was originally obtained. Obtain the consent of the person concerned before externally disclosing any personal information, unless legal process or contractual obligation provides otherwise.