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# **CODE OF CONDUCT AND BUSINESS ETHICS**

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## 1. INTRODUCTION

RedPlanet Berhad and its subsidiaries (collectively, **RedPlanet Group**) uphold the highest standards of ethical conduct, legal compliance, and responsible business practices. This Code of Conduct & Ethics (“Code”) articulates the principles that guide our operations and interactions with all internal and external stakeholders, including employees, contractors, suppliers, customers, regulators, and the public. This Code applies universally to all individuals and entities representing or working with RedPlanet Group and serves as a foundational document reflecting our commitment to integrity, transparency, respect, and accountability in every aspect of our business.

## 2. PURPOSE

The purpose of this Code is to cultivate a corporate culture grounded in integrity, accountability, and ethical conduct. It is designed to ensure full compliance with all applicable laws, regulations, and internal policies, to promote responsible corporate citizenship and sustainable business practices, to safeguard RedPlanet Group’s reputation and assets, and to provide clear and practical guidance on ethical and professional behavior for all stakeholders associated with the Group.

## 3. CONDUCT OF BUSINESS AND FAIR DEALING

No Director or employee shall:

- Compete with the Group by providing services to a competitor, whether as an employee, officer or Director;
- Profit, or assist others to profit from any business opportunities that he/she gains by virtue of his/her position in the Group;
- Profit, or assist others profit from confidential information of the Group;
- Improperly influence or attempt to influence any business transaction between the Group and another entity, in which a Director has a direct or indirect financial interest or acts as an employee, officer or Director;
- Take unfair advantage of any customer, supplier, competitor or other person through manipulation, concealment, misrepresentation of material facts and/or other unfair practice: or
- Indulge in or found to be in possession of drugs.

## 4. COMPLIANCE WITH LAWS AND REGULATIONS

RedPlanet Group strictly adheres to all applicable laws, rules, and regulations in the countries where it operates. This includes, but is not limited to, compliance with anti-bribery and anti-corruption laws, competition and antitrust regulations, labor and employment statutes, environmental laws, occupational health and safety regulations,

and data privacy legislation. Any failure to comply with these legal requirements is regarded as a serious breach of this Code and will be subject to prompt investigation and corrective action.

## **5. ANTI-CORRUPTION AND BRIBERY**

The Group maintains a zero-tolerance stance on corruption and bribery in all forms. Employees and business partners must neither offer nor accept bribes, kickbacks, facilitation payments, or any other form of improper benefit. Hospitality and gifts, if offered or received, must be reasonable, transparent, and in compliance with applicable laws and RedPlanet Group's policies. These actions are intended to avoid even the appearance of impropriety and maintain the highest standards of ethical business conduct.

## **6. CONFLICTS OF INTEREST**

All personnel must proactively avoid situations where personal interests could conflict with the interests of RedPlanet Group. This includes financial interests, external business activities, family or personal relationships, or any circumstance that might impair impartiality. Employees and associates are required to disclose any actual or potential conflicts of interest promptly to their supervisors or the compliance department. Where conflicts exist, affected individuals must refrain from participating in related decisions or actions to maintain objectivity and fairness.

## **7. CONFIDENTIALITY AND DATA PROTECTION**

Protecting confidential and sensitive information is critical to the Group's success and reputation. All employees, contractors, and partners must safeguard such information from unauthorized disclosure, loss, or misuse, and comply with applicable data protection laws such as the Personal Data Protection Act (PDPA) and the European Union's General Data Protection Regulation (GDPR), where relevant. Disclosure of confidential information to third parties is strictly prohibited unless authorized and necessary for legitimate business purposes, with appropriate safeguards in place.

## **8. HUMAN RIGHTS, LABOR, AND WORKPLACE STANDARDS**

RedPlanet Group is dedicated to upholding internationally recognized human rights and labor standards throughout its operations and supply chains. We categorically reject child labor, forced labor, and human trafficking. We are committed to providing a workplace free from discrimination, harassment, bullying, and retaliation. Employees must be treated fairly and with dignity, receiving equitable wages, lawful working hours, and a safe, healthy working environment. The Group supports freedom of association and collective bargaining rights where permitted by law.

## **9. ENVIRONMENTAL RESPONSIBILITY**

Recognizing our responsibility to protect the environment, RedPlanet Group actively pursues sustainable business practices. We comply with all environmental laws and regulations and continuously strive to reduce our environmental impact through initiatives that promote resource conservation, energy efficiency, waste minimization, pollution prevention, and biodiversity protection. We also encourage our suppliers and partners to adopt environmentally responsible practices consistent with our sustainability goals.

## **10. USE OF COMPANY ASSETS**

Company assets, including physical property, financial resources, technology, intellectual property, and data, must be used ethically, securely, and exclusively for legitimate business purposes. Employees and stakeholders must avoid waste, theft, or unauthorized use of resources. The Group maintains strict controls to safeguard its assets and expects all users to comply with relevant policies and procedures.

## **11. RELATIONS WITH CUSTOMERS**

RedPlanet Group commits to building and maintaining customer trust through transparency, reliability, and quality. We deliver products and services that meet or exceed customer expectations and prioritize customer safety and privacy. The Group values customer feedback and is dedicated to addressing complaints swiftly and fairly, while ensuring the confidentiality of customer information.

## **12. RELATIONS WITH SUPPLIERS AND BUSINESS PARTNERS**

Engagement with suppliers and partners is conducted on principles of fairness, merit, quality, price competitiveness, and ethical conduct. RedPlanet Group expects its suppliers and partners to comply with all relevant laws and uphold ethical standards, including respect for labor rights, environmental protection, and anti-corruption measures. We conduct due diligence and monitoring to ensure compliance and reserve the right to terminate relationships with those who violate our standards.

## **13. COMMUNITY ENGAGEMENT AND PUBLIC INTERACTION**

As a responsible corporate citizen, RedPlanet Group is committed to positively contributing to the communities in which we operate. We engage with the public and community stakeholders transparently and respectfully. The Group supports initiatives that promote social welfare and sustainable development while protecting its reputation through responsible public communications.

## **14. REPORTING VIOLATIONS AND WHISTLEBLOWER PROTECTION**

RedPlanet Group encourages all employees and stakeholders to report any suspected violations of this Code, unlawful activities, or unethical conduct through designated confidential reporting channels. Reports may be made without fear of retaliation or adverse consequences. The Group ensures that whistleblowers acting in good faith are protected and that all reports are thoroughly investigated with confidentiality and due process.

## **15. ACCOUNTABILITY AND ENFORCEMENT**

The responsibility to uphold this Code rests with every individual associated with RedPlanet Group. Non-compliance will result in appropriate disciplinary measures, including termination of employment or contracts, and may entail legal penalties. Managers and leaders are entrusted with promoting and enforcing compliance while fostering an ethical culture. The Compliance team oversees training, investigations, monitoring, and support for ethical conduct across the Group.

## **16. REVIEW AND AMENDMENTS**

This Code is reviewed periodically to reflect evolving legal requirements, best practices, and business circumstances. The Board of Directors and senior management bear responsibility for overseeing the Code's implementation, effectiveness, and continual improvement to maintain the highest ethical standards.

## **17. WAIVER OF THE CODE**

In extraordinary circumstances and where it is clearly in the Group's best interest to do so, the Chairman of the Board, upon recommendation by the Audit Committee and approval by the Board, may waive the compliance with any provision of this Code on a case-to-case basis.

## **18. CONCLUSION**

RedPlanet Group is committed to operating with integrity, fairness, and respect for all stakeholders and the environment. We expect all who engage with us to honor these principles and support our mission to build a sustainable, responsible, and trusted business.