



99 SPEED MART RETAIL HOLDINGS BERHAD

[Registration No. 202301017784 (1511706-T)]

CODE OF CONDUCT AND BUSINESS ETHICS (COBE)

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PART A: OVERVIEW

1. INTRODUCTION

1.1 99 Speedmart (“99” or the “Group”) developed this Code of Business Ethics (“Code”) to ensure that its employees and business partners adhere to the Group’s commitment to the highest ethical standards and law in day-to-day business operation. The success of the Group’s business is dependent on the trust and confidence earned from its employees, business partners and customers.

1.2 The Group gains credibility by adhering to its commitments, displaying honesty and integrity, and reaching Group goals solely through honorable conduct.

1.3 This Code defines the Group’s standards and expectations as they relate to ethical business and serves as a guide to appropriate conduct.

1.4 This Code is not a comprehensive guide that covers all ethical situations. In any circumstances which are not covered by this Code or in case of any doubt, you may refer to your respective Head of Department or the Directors for clarification or guidance.

2. SCOPE

2.1 This Code applies to all Directors and employees (whether temporary or permanent) of 99 Speedmart.

2.2 The Group strongly encourages its business partners to act consistently with this Code, when working on the Group’s behalf and/or in collaboration with 99 Speedmart.

2.3 The Group and its employees are bound by the law. Compliance with all applicable laws and regulations must never be compromised. Additionally, employees shall adhere to internal rules and regulations as they apply in a given situation. Those internal rules are specific to the Group and may go beyond what is required by the law.

2.4 This Code should be read in conjunction with other applicable policies of the Group. It is everyone’s responsibility to be familiar with this Code, policies, guidelines, and any supplemental policies.

PART B: GROUP’S ASSETS, INFORMATION AND DATA

3. DATA PROTECTION AND USE OF GROUP’S DATA

3.1 The Group has put in place its Privacy Policy, and everyone shall record, manage, store and/or transfer all data and records in compliance with the policy and applicable laws and regulations, in particular Personal Data Protection laws.

3.2 In the course of business, the Group may provide its employees with a variety of resources and assets including any licensed applications and/or software for its employees to deliver their work. It is the responsibility of the employees to safeguard and make proper use of the resources and assets in compliance with all applicable laws, the Group's policies, and licensing agreements. Employees shall also take all reasonable and necessary steps to prevent the loss, damage, misuse, theft or fraud of the Group's resources and assets.

4. CONFIDENTIALITY

4.1 Confidential information consists of any information that is not or is not yet public information. It includes trade secrets, business, marketing and service plans, consumer insights, engineering and manufacturing ideas, product recipes, designs, databases, records, salary information and any non-published financial or other data.

4.2 Each employee must maintain the confidentiality of confidential information provided or given access by the Group and/or its customers, except when disclosure is authorized by the law or regulations. Confidential information includes all non-public information that, if disclosed, might be useful to competitors or harmful to the Group or its customers. It also includes information that suppliers and customers have entrusted to the Group.

4.3 The obligation to preserve confidential information continues beyond the termination of employment.

5. PROTECTION AND PROPER USE OF GROUP ASSETS

5.1 All employees should endeavor to protect the Group's assets and to ensure efficient use of the same. Any suspected incident of fraud or theft shall be immediately reported for investigation. Except for incidental personal use, the Group's equipment should not be used for purposes that do not relate to its business.

5.2 The obligation of employees to protect the Group's both tangible and intangible assets include its proprietary information, which includes but is not limited to intellectual property, such as trademarks, copyrights, patents, designs, and trade secrets, as well as business or marketing strategic plans, ideas, databases, records, salary information and any unpublished financial data and reports.

5.3 Any unauthorized use or distribution of this information is a violation of the Code of Conduct and this Code and therefore may attract disciplinary proceedings.

PART C: DUTY OF GOOD FAITH, DILIGENCE AND INTEGRITY

6. CONFLICT OF INTEREST

A Conflict of Interest occurs when personal interests of an employee or the interests of a third party compete with the interests of the Group. In such occurrence or if an employee faces a situation that may involve or lead to a Conflict of Interest, the employee shall disclose it to the HR or Legal & Compliance department to resolve the situation in a fair and transparent manner. Employees shall avoid Conflicts of Interest situations whenever possible.

7. ANTI-BRIBERY AND ANTI-CORRUPTION

7.1 The Group takes a strong stance against bribery and corruption. No one should directly or indirectly, privately, or publicly accept any kind of bribes, money, loan, kickbacks or any other unlawful or unethical benefits that might be seen to be an activity or behavior that could give rise to suspicion of such conduct.

7.2 The Group has put in place its Anti-Bribery and Anti-Corruption Policy and other related policies such as its No Gift Policy. All employees shall adhere to and comply with all the relevant and applicable policies and laws.

7.3 The giving or accepting of gifts may create the perception of a conflict of interest or other impropriety that could ultimately affect the reputation and standing of the Group. As such, subject only to certain limited exceptions as allowed in the No Gift Policy, all directors and employees are prohibited from directly or indirectly receiving or providing gifts.

7.4 It is the responsibility of all employees to inform external parties involved in any business dealings with the Group that the Group practices a “No Gift Policy” and to request the external party’s understanding and adherence to its policy.

8. INSIDER TRADING

8.1 Employees who have access to confidential information and/or market sensitive information are not allowed to use or share that information for stock trading purposes or for any other purpose except to conduct the business of 99 Speedmart.

8.2 All non-public information in relation to the Group should be considered confidential and the use of non-public information for personal financial benefit or to “tip” others who might make an investment decision on the basis of this confidential information is not only unethical but also illegal.

9. ANTI-MONEY LAUNDERING

Money laundering is defined as the process of converting illegal proceeds to appear legitimate and is not limited to only cash transactions. Involvement in such activities undermines the Group’s integrity, damages its reputation, and may expose the Group and the perpetrators to severe

sanctions and legal consequences. All employees shall report to their respective Head of Department, Finance Department or Legal & Compliance Department any suspicious financial transactions and activities.

10. WHISTLEBLOWING

10.1 The Group has put in place its Whistleblowing Policy to uphold the highest standard of professionalism, integrity, and ethical behavior in the conduct of the Group's business and operations.

10.2 The Whistleblowing Policy sets out the reporting channel, guidelines and procedures which enables anyone including employees and members of the public to lodge any genuine concerns pertaining to any actual or suspected unlawful, illegal, wrongful, or improper conduct.

10.3 The Group will not retaliate nor condone any retaliation against employees who made such whistleblowing report in good faith.

11. HUMAN RIGHTS, DISCRIMINATION, AND HARASSMENT

The Group respects the personal dignity, privacy and personal rights of every employee and is committed to maintaining a workplace free from discrimination and harassment. Therefore, all employees must not discriminate on the basis of origin, nationality, religion, race, gender, age or sexual orientation, or engage in any kind of verbal or physical harassment based on any of the above or any other reason. The "Code of Practice on the Prevention and Eradication of Sexual Harassment in the Workplace" issued by the Ministry of Human Resources shall also be complied. The Group is committed to respecting human rights in all areas of its business and this commitment is applicable to all employees and business partners, which involves prohibition of using child labor and prohibition of human trafficking.

PART D: SUSTAINABLE DEVELOPMENT

99 Speedmart is committed to conducting our business with the highest standards of sustainability. It is not only a responsibility but also an opportunity to create a long-term value for our stakeholders, including employees, business partners, and our customers.

PART E: REVIEW

This Code is dated 6th November 2023 and may be reviewed periodically subject to the Group's discretion and changes in law.