

CYL CORPORATION BERHAD
200001013537 (516143-V)
(Incorporated in Malaysia)

CODE OF CONDUCT

1. Introduction

The Board of Directors of CYL Corporation Berhad (“the Company”) and its subsidiaries (“the Group”) is committed to creating an environment whereby ethics and professionalism are placed in the highest priority in line with good corporate governance practices. This Code of Conduct (“Code”) establishes the guiding principles and expected standards of behavior for all Directors, employees, and representatives of the Group to ensure alignment with ethical and responsible business conduct, good corporate governance practices, and applicable laws and regulations.

2. Objective

Our Code aims to promote a culture of honesty, integrity, and accountability across the Group, while guiding ethical decision-making at all levels of the organization. It seeks to ensure full compliance with all applicable legal and regulatory obligations, safeguard the reputation and long-term sustainability of the Group, and support Directors in fulfilling their fiduciary duties responsibly and effectively.

3. Applicability

Our Code applies to all individuals associated with the Group, including the Board of Directors (both Executive and Non-Executive), management, employees at all levels, as well as contract staff, consultants, and business representatives. All parties are expected to understand, adhere to, and consistently uphold the principles and standards always set out in this Code.

4. Core Areas of Conduct

4.1 Integrity and Professionalism

We are expected to act in good faith, responsibly, and with due care in the performance of our duties. We must carry out our responsibilities with competence, diligence, and a high level of professionalism, while consistently always upholding the best interests of the Group in every decision and action.

4.2 Corporate Governance

Our directors and management are responsible for ensuring effective governance, oversight, and accountability within the Group. We must remain well informed of the Company's affairs and all relevant regulatory obligations, actively participate in meetings and decision-making processes, and exercise independent judgment in carrying out our duties, always acting for proper and lawful purposes.

4.3 Corporate Disclosure

We are committed to ensuring timely, accurate, and transparent disclosure of material information in accordance with applicable laws, regulations, and listing requirements. All disclosures to shareholders, regulators, and the public must be consistent, not misleading, and appropriately authorized. Confidential and price-sensitive information must be safeguarded until it is properly released to the public to ensure fairness and prevent insider trading. Only designated spokespersons are permitted to communicate with external parties on behalf of the Group.

4.4 Customer Relations and Responsibility

We are committed to conducting all customer interactions with integrity, transparency, and accountability, recognizing that customer trust is essential to long-term sustainability. All products and services shall comply with applicable quality, safety, and regulatory standards, while communication, including marketing, must be accurate and not misleading. Customer information is safeguarded in accordance with applicable data protection laws, and feedback or complaints are addressed in a timely and fair manner.

4.5 Supplier and Business Partner Conduct

We are committed to maintaining ethical, transparent, and professional relationships with our suppliers and business partners. Procurement activities shall be conducted fairly and based on objective criteria, while suppliers are expected to comply with applicable laws, anti-corruption requirements, and recognized environmental and social standards. Conflicts of interest must be disclosed and managed appropriately, and confidential information must be safeguarded. We also promote responsible sourcing and monitors supplier performance to ensure compliance. These practices support supply chain integrity, risk mitigation, and sustainable long-term partnerships aligned with good corporate governance.

4.6 Conflicts of Interest

4.6.1 General Principles

We must avoid situations where personal interests conflict or conflict with the interests of the Group.

4.6.2 Requirements

We are required to disclose any actual, potential, or perceived conflicts of interest promptly to the appropriate authority within the Group. We must abstain from participating in any decision-making process where such conflicts exist and obtain prior approval before engaging in any external activities that could give rise to a conflict with the Group's interests.

4.6.3 Prohibited Conduct

No individual shall use their position within the Group for personal gain or benefit, nor divert business opportunities away from the Group. Additionally, we must not misuse company assets, information, or influence for personal advantage, and must refrain from engaging in external activities that could impair our objectivity, independence, or performance of duties.

4.7 Confidentiality and Information Protection

All confidential, proprietary, and sensitive information of the Group must be safeguarded against unauthorized access or disclosure. Such information shall only be used for legitimate business purposes and must be handled in strict compliance with applicable laws and regulatory requirements. Under no circumstances should inside information be used for personal advantage, including activities such as insider trading.

4.8 Personal Data Protection (PDPA) Policy

We are committed to protecting personal data in compliance with the Personal Data Protection Act (PDPA) and all applicable data protection laws. All personal data must be collected, processed, used, stored, and disclosed responsibly and only for legitimate business purposes. We must ensure that personal information is secured against unauthorized access, misuse, or disclosure, and handled with strict confidentiality. Any breach or suspected breach of personal data must be reported promptly in accordance with the Group's policies.

4.9 Anti-Corruption and Bribery

We adopt a zero-tolerance approach towards bribery and corruption in all forms. No individual shall offer, give, receive, or solicit any form of bribe or improper advantage. Any gifts, entertainment, or hospitality must be reasonable, lawful, and not intended to improperly influence business decisions.

4.10 Workplace Behaviors and Respect

We respect internationally recognized human rights and are committed to maintaining ethical labour practices across all operations. Equal opportunities are provided to all individuals regardless of gender, race, religion, age, nationality, disability, or any other protected characteristic. We strictly prohibit all forms of harassment, including sexual harassment, bullying, intimidation, and any verbal, physical, or psychological abuse. All individuals must be treated with dignity, fairness, and respect always.

4.11 Sexual Harassment

We adopt a zero-tolerance approach towards sexual harassment in any form. Sexual harassment refers to any unwelcome conduct of a sexual nature whether verbal, non-verbal, physical, or visual that is offensive, intimidating, or creates a hostile working environment. This includes inappropriate remarks, jokes, gestures, advances, or requests for sexual favors. We are expected to behave professionally and always treat others with dignity and respect. Any reported incident will be handled confidentially, investigated promptly, and may result in disciplinary action, without fear of retaliation against the complainant.

4.12 Health, Safety, and Well-being

We provide a safe and healthy working environment for all employees. This includes complying with all applicable occupational health and safety laws and standards, implementing appropriate safety measures, and fostering a culture that promotes overall employee well-being.

4.13 Environmental Responsibility

We are committed to operating in an environmentally responsible manner by complying with all applicable environmental laws and regulations. Efforts will be made to minimize environmental impact, promote sustainable practices, and increase awareness of environmental responsibility throughout the organization.

4.14 Protection of Company Assets

All company assets, including physical, financial, digital, and intellectual property, must be used responsibly and solely for legitimate business purposes. We are responsible for safeguarding these assets from misuse, loss, theft, or unauthorized use always.

5. Board Appointment and Governance

The Board ensures effective leadership through structured nomination and selection processes that evaluate candidates based on their skills, experience, independence, and ability to contribute to the Group. Continuous efforts are undertaken to strengthen the Board's composition. The Nomination Committee plays a key role in reviewing and recommending suitable candidates, as well as conducting background checks and thorough assessments to ensure the integrity and competence of Board members.

6. Reporting and Whistleblowing

We have a responsibility to report any violations of this Code, as well as any unethical or illegal conduct. Reports may be made through appropriate channels, including immediate supervisors, Executive Management, or directly to the Chairman of the Audit Committee. We are committed to protecting whistleblowers from any form of retaliation and ensuring that all reports are handled and investigated fairly, promptly, and confidentially.

7. Compliance and Enforcement

We are required to fully comply with our Code. Any breach of the Code will result in appropriate disciplinary action, which may include termination of employment or legal proceedings where necessary. We will also provide ongoing training and awareness programs to ensure that all personnel understand and adhere to the Code.

8. Review and Updates

Our Code shall be reviewed periodically by the Board to ensure its continued relevance and effectiveness. It will be updated as necessary to reflect changes in regulatory requirements, industry standards, and best global practices.

The Code of Conduct is approved by the Board of Directors on 22 June 2026.