



PSP Group

CODE OF CONDUCT & ETHICS

Updated as at 22/10/2025



CODE OF CONDUCT & ETHICS

1.0 INTRODUCTION

1.1 PSP Energy Berhad ("**PSP Energy**" or the "Company") is committed to conducting business with integrity, professionalism, and in compliance with all applicable laws and regulations, including the requirements set by Bursa Malaysia Securities Berhad ("**Bursa Securities**"). This Code of Conduct & Ethics ("**Code**") sets out the principles and standards of ethical behavior expected from all employees, directors, and stakeholders of the Company.

2.0 OBJECTIVES

2.1 The objectives of this Code are to:

- a) Foster a culture of integrity, transparency, and accountability within the Company.
- b) Ensure compliance with applicable laws, regulations, and industry best practices.
- c) Promote ethical decision-making and responsible corporate behavior.
- d) Safeguard the Company's reputation and stakeholder confidence.

3.0 SCOPE

3.1 This Code applies to all employees, directors, officers, and representatives of the Company and its subsidiaries (collectively, the "**Group**"). It also extends to third-party vendors, contractors, and business partners engaging with the Group.

4.0 PRINCIPLES OF BUSINESS CONDUCT

4.1 Compliance with Laws and Regulations

The Company and its employees shall comply with all applicable laws, regulations, and corporate policies. Employees must not engage in any activities that violate the Bursa Malaysia ACE Market Listing Requirements ("**AMLR**") or the Capital Markets and Services Act 2007 ("**CMSA**").



4.2 Integrity and Anti-Corruption

The Company has a zero-tolerance policy for corruption, bribery, and fraudulent activities. Employees must not offer, solicit, or accept any form of bribe or unethical advantage. Any suspected cases of bribery or corruption must be reported to the appropriate compliance officer or whistleblowing channel.

4.3 Conflict of Interest

Employees must avoid situations where personal interests conflict with the Company's interests. Any potential or actual conflict of interest must be disclosed to management for assessment and resolution. This includes:

- a) Holding financial or ownership interests in competitors, suppliers, or clients.
- b) Engaging in external employment or business activities that compete with the Company.
- c) Making business decisions that benefit personal relationships over Company interests.

4.3 Insider Trading

Employees who have access to confidential or material non-public information regarding the Company must not use such information for personal gain. The following actions are strictly prohibited:

- a) Trading the Company's securities based on insider information.
- b) Sharing material non-public information with third parties for investment purposes.
- c) Using Company knowledge to influence market transactions unfairly.

4.4 Money Laundering Prevention

The Company is committed to preventing money laundering and ensuring compliance with all applicable anti-money laundering ("**AML**") laws and regulations. Employees must:

- a) Conduct due diligence on business transactions and counterparties.
- b) Report any suspicious financial transactions to the relevant authorities.
- c) Avoid dealing with parties involved in illicit financial activities.



4.6 Confidentiality and Data Protection

Employees must safeguard confidential information and proprietary data of the Company. Disclosure of sensitive information to unauthorized parties is strictly prohibited.

4.7 Fair and Ethical Business Practices

The Company is committed to fair competition and ethical business dealings. Employees must not engage in deceptive, misleading, or anti-competitive practices.

5.0 WORKPLACE CONDUCT

5.1 Respect and Non-Discrimination

The Company promotes a workplace free of discrimination, harassment, and bullying. Employees must treat colleagues, clients, and business partners with respect and dignity.

5.2 Health, Safety, and Environment

The Company prioritizes workplace safety and environmental sustainability. Employees must adhere to all health, safety, and environmental policies to prevent workplace hazards.

5.3 Use of Company Assets

Employees must use Company assets responsibly and for legitimate business purposes only. Misuse or misappropriation of Company resources is strictly prohibited.

6.0 REPORTING VIOLATIONS AND WHISTLEBLOWING

6.1 Employees are encouraged to report any violations of this Code through the Company's whistleblowing channels.

6.2 The Company ensures confidentiality and protection against retaliation for whistleblowers who report in good faith.



7.0 DISCIPLINARY ACTION

- 7.1 Any breach of this Code may result in disciplinary action, including termination of employment.
- 7.2 The Company reserves the right to take legal action against employees or stakeholders who engage in unethical or unlawful conduct.

8.0 REVIEW AND AMENDMENT

- 7.1 The Board of Directors shall review this Code periodically to ensure its continued relevance and effectiveness.
- 7.2 Amendments to this Code shall be communicated to all employees and stakeholders as necessary.

The Code of Conduct and Ethics has been approved and adopted by the Board of Directors on 22 October 2025.