

CODE OF ETHICS AND CONDUCT

To sustain good corporate governance, the Board of Directors has formulated and adopted a code of ethics and conduct.

Through the Code of Ethics and Conduct ('CEC'), we create a culture in which people act as a team, toward the greater goal of the Company.

The CEC is applicable to all Directors and employees (including full time, probationary, contract, part time and temporary staff) of the Group.

I. Principles

Compliance with Laws

All directors and employees shall always observe and ensure compliance with all applicable laws, rules and regulations to which they are bound to observe in the performance of their duties. In addition, all directors and employees must comply with the ethical and technical requirements of any relevant regulatory or professional body.

Confidentiality

It is pertinent that all directors and employees exercise caution and due care to safeguard any information of confidential and sensitive nature relating to the Group during their course of duties. They must not disclose official or confidential information to others or third parties, unless proper authorisation is given or legally mandated.

Confidential information received by each director in the course of the exercise of directorial duties shall be kept confidential and will not be disclosed or released to any person other than Board members, except as required by law or as agreed by the Board.

Conflicts of Interest

All directors and employees shall not conduct themselves in such manner as likely to bring their private personal matters into conflict with their duties to the Group or to subordinate their duties in favour of their private personal matter.

Harassment in the workplace

The Company is committed to providing a work environment that is free of discrimination and unlawful harassment.

Actions, words, jokes or comments based on an individual's sex, race, ethnicity, age, religion, or any other legally protected characteristic will not be tolerated.

If directors and employees believe that they have been made a victim of harassment, or know of another employee who has, the employee is to report it immediately. Employees can raise concerns and make reports without fear and reprisal.

Dealings in securities

No director or employee shall use price sensitive non-public information, which can affect the prices of the securities of the Company and/or related listed companies when it becomes publicly known ("Inside Information"), for personal benefit. Directors and employees are prohibited to trade in securities or to provide information to others to

trade in securities of the Company and/or related listed companies until the Inside Information is publicly released.

Environment, health and safety

The Group will use its best endeavours to ensure a safe workplace and maintain proper occupational health and safety practices to commensurate with the nature of the Group's businesses and activities.

II. Reporting Violation of The CEC

Any employee who knows of, or suspects, a violation of the CEC, is encouraged to whistle blow or report their concerns through the Whistleblowing Policy. The provision, protection and procedure of the Whistleblowing Policy for reporting of the violations of the CEC are available on the Company's website, www.magnaprima.com.my. No individual will be discriminated against or suffer any act of retaliation for reporting in good faith on violations or suspected violations of the CEC.

II. Review of the CEC

The CEC may be reviewed regularly by the Board to ensure that it continues to remain relevant and appropriate and will be published on the Company's website, www.magnaprima.com.my.