
CODE OF BUSINESS CONDUCT & ETHICS

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CODE OF BUSINESS CONDUCT & ETHICS

1. INTRODUCTION

At LBS Bina Group Berhad (“**LBS**” or “**Company**”) and its subsidiaries (collectively be referred to as “**The Group**”), we are committed to conducting business with integrity, respect, and accountability. Our reputation is built on trust of our customers, employees, and the communities we serve. This Code of Business Conduct and Ethics (“the Code”) outlines the ethical principles and standards that guide our actions and decisions.

All internal stakeholders and external stakeholders of The Group are expected to uphold these principles in their daily work. By adhering to the Code, we aim to foster a culture of transparency, fairness, and compliance with all the relevant applicable laws, rules, and regulations.

Together, we can uphold the highest standard of integrity and contribute to the long-term success of The Group.

2. OBJECTIVE

The objective of the Code is to establish a clear framework of ethical standards and professional behaviour expected from all our internal and external stakeholders. It serves to promote integrity, accountability, and respect within the workplace while ensuring compliance with legal and regulatory requirements. By adhering to this Code, we collectively uphold the values and reputation of the company, fostering a positive and responsible work environment.

3. OUR CORE VALUES



3. SUSTAINABLE DEVELOPMENT

The Group is committed to integrating sustainability into its core operations, focusing on environmental stewardship, social responsibility, and robust governance. Guided by The Group's Sustainability Policy, we align our practices with the United Nations Sustainable Development Goals (UNSDGs) to balance community needs, shareholder interests and environmental considerations.

Our Board has approved four key Sustainability Goals to guide our strategic direction and operational practices. LBS has articulated a comprehensive sustainability development framework centred around four key goals: -

- (a) Economic Prosperity - LBS is committed to advancing economic growth through innovation, operational excellence, and long-term value creation. We strive to enhance supply chain resilience by integrating sustainable procurement practices and collaborating with suppliers who share our ethical and operational standards. Through these efforts, we support inclusive economic development while fostering a more resilient and responsible business ecosystem.
- (b) Climate Resilience – In support of the nation's Net Zero Carbon Emissions roadmap by 2050, LBS is committed to conducting its business in an environmentally responsible and sustainable manner. Our commitment includes strategic initiatives such as the development of solar farms, adoption of Industrialized Building System, and the integration of green practices across our operations.
- (c) Social Enrichment – LBS focuses on enriching communities and the workplace through ethical engagement. As part of this commitment, LBS has implemented a formal Grievance Mechanism to provide a clear, fair, and transparent process for raising concerns or reporting of misconduct. This mechanism supports a safe and supporting work environment, promotes trust and reinforces our dedication to uphold human rights, equity, and ethical labour practices. Additionally, LBS also actively engages in community outreach initiatives and programmes to create a lasting social impact.

(d) Good Governance – LBS emphasizes strengthening ethical excellence, accountability, and strong governance across the organization. This includes promoting transparency in decision-making and operations, implementing effective compliance frameworks to uphold laws and regulations, ensuring active board oversight to give strategic direction and risk management. We, at LBS also values meaningful stakeholder engagement, fostering open communication and trust with our internal and external stakeholders to support sustainable and responsible growth.

These sustainability goals are supported by various policies, including the Group Sustainability Policy and the Environmental Policy Statement, which guide LBS's efforts in integrating sustainable practices into our business operations.

Our journey as a sustainable developer is underscored by the following key achievements as of year 2025:

- **Established a RM750.0 million Sukuk Wakalah Programme**
Becoming the first real estate developer in Malaysia to issue a social sukuk under the ASEAN Sustainable Finance Taxonomy. Successfully raised RM200.0 million through the inaugural tranche of the ASEAN Social SRI Sukuk Wakalah to finance affordable housing projects.
- **Driving Construction Efficiency with LBS**
Through our subsidiary, MGB Berhad, we adopt the Industrialised Building System (IBS) across its developments, significantly enhancing construction efficiency, minimizing waste, improving build quality, and promoting sustainable practices. This strategic approach underscores our commitment to innovation and environmentally responsible development
- **Empowering Employee Experience for a Sustainable Success**
LBS's commitment to sustainable growth is demonstrated through the launch of an integrated HR system that enhances data transparency and empowers employees. Additionally, LBS invests an average of RM300,000 annually in learning and

development initiatives and employee engagement activities. One of our key achievements is our Star Talent program, which continuously fosters high-potential employees by equipping them with skills to excel. Our commitment to talent development and a supportive workplace has earned us the Graduates' Choice Award for three consecutive years (2022–2024).

- **Established a Net Zero Carbon Emissions by 2050 Roadmap**

In recognition of the urgent need to combat climate change, we have charted a clear and actionable path towards net zero carbon emissions by year 2050.

- **Championing Gender Diversity in Leadership**

We have achieved a significant milestone in board diversity, with more than 30% of our board members are being women. This reflects our belief and our commitment to driving a meaningful change in corporate governance and representation.

- **Empowering Communities through LBS Foundation**

The LBS Foundation was established as a dedicated platform to advance our Corporate Social Responsibility (CSR) agenda. Through this foundation, we champion impactful programs focused on health, education, environment, and community.

These accomplishments are a testament to our ongoing commitment to sustainability, transparency, and innovation. As we continue to grow, we remain steadfast in our purpose with our four key goals as our pillars.

4. GOVERNANCE AND PROCEDURES – to act with integrity and ethics

- (i) **ANTI-BRIBERY AND CORRUPTION**

The Group prohibits all forms of bribery, corruption and money laundering which may take the form of anything of value, such as money, goods, services, property(ies), privilege(s), employment position or preferential treatment in connection with all its operations.

We are committed to conduct our business ethically and in accordance with the Malaysian Anti-Corruption Commission (MACC) Act 2009 and the MACC (Amendment) Act 2018, Malaysian Penal Code (revised 1977) (and its amendments), Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 and the Companies Act 2016 (Malaysia) and any other applicable laws. (Reference: *Anti-Bribery and Corruption Policy* [<https://lbs.com.my/policies/anti-bribery-and-corruption-policy/>])

(ii) GIFT, ENTERTAINMENT AND HOSPITALITY

The Group adopts a “No Gifts, Entertainment and Hospitality policy” whereby all members, including but not limited to the Directors, employees, their family members, representative and/or business associates of The Group are prohibited from, directly or indirectly receive, or provide gifts, entertainment and hospitality save and except in certain situations mentioned in this policy.

It is our collective responsibility to inform any third parties involved in any business dealings with The Group of the “No Gifts, Entertainment and Hospitality policy” and to request all parties to understand, respect and adhere to the policy. (Reference: *Gift, Entertainment and Hospitality Policy* [<https://lbs.com.my/policies/gift-entertainment-hospitality-policy/>])

(iii) DONATIONS AND SPONSORSHIPS

The Group makes donations to LBS Foundation, a registered non-profit organization with the sole aim to give back to the community, structured around its 4 main pillars: Health, Education, Environment, and Community. Apart from that, we also continuously seek opportunities to contribute more to the community through other donations, sponsorships, and corporate responsibility programs. Thus, it is your collective responsibility to understand that payments for donations, sponsorships and corporate responsibility programs are made in full compliance with our Donations and Sponsorship Policy, Anti-Bribery and Corruption Policy and any applicable laws and regulations. (Reference: *Donations and Sponsorship Policy*. [<https://lbs.com.my/policies/donations-sponsorships-policy/>])

Any charitable and/or political donations and sponsorships provided by The Group must be ethical, legal under applicable laws and not with intention to influence, to retain, or gain improper advantage of a business deal or decisions or cause others to perceive it as such.

(iv) CONFLICT OF INTEREST

Conflict of interest occurs when you have or appear to have a competing interest or loyalty that could interfere with your ability to make fair, objective, or ethical decision as an employee of The Group. You shall avoid such conflict and/or situations that may or be perceived to compromise or influence your judgment during the discharge of your duties and responsibilities as an employee or a professional. You must not exploit your position, working hours, company resources, assets, relationships, or any information obtained, directly or indirectly, through your job for your personal benefits.

It is your direct responsibility to disclose and declare any conflict of interest related to financial benefit, personal relationship, personal gains, or involvement. This should be done through the company's onboarding exercise of Conflict-of-Interest Declaration process. Your failure to do so may result in disciplinary action to be taken, including but not limited to termination of employment, as well as potential legal actions in the interest of The Group. *(Reference: Conflict of Interest. [<https://lbs.com.my/policies/conflict-of-interest/>])*

(v) REMUNERATION POLICY

The Group has formulated this policy to ensure payment of equitable, competitive remuneration to key managerial personnel, senior management, and all employees of The Group based on individual performance, Company's benchmark, industry practice and performance of the Company as a whole.

The compensation would be guided by the external competitiveness and internal party through annual benchmarking surveys wherein the remuneration structure is broadly divided into fixed and variable components. The fixed component comprises of salary, allowances, perquisites, and benefits-in-kind. The variable

component comprises of annual performance bonus of the individual employee and LBS's overall performance.

Internally, performance ratings of all employees would be spread across a normal distribution bell curve. The rating obtained by an employee will be used as an input to determine bonus payout and annual pay increases. Variable and annual pay increase will be calculated using a combination of individual performance and organizational performance. Compensation may also reflect critical skill sets essential to our organizational success. It is determined as per management's review of market demand and supply, Industry benchmarks etc.

The competitive comparator is selected based on Industry Relevance, Task relevance and Size of Organization. *(Reference: Remuneration Policy [https://lbs.com.my/policies/remuneration-policy/])*

5. STRENGTHENING OUR WORKING ENVIRONMENT - to foster a safe, inclusive, and productive workplace

(i) HUMAN RIGHTS POLICY

We endeavour to provide a conducive working environment that characterize mutual respect. The Group is committed to respecting and abiding internationally recognized human rights standards and fair labour practices according to relevant international treaties and/or convention and local statutory laws within The Group operations ("Human Rights Laws").

The Group recognises the significance of fair labour practices and maintaining a positive, respectful relationship with employees to promote high morale and enhance employee engagement. We strictly prohibit any practices, events or activities that violate the Human Rights Laws.

In our pursuit to uphold the same, The Group undertakes the following:

- (a) The Group has a zero-tolerance policy against discrimination in any form and employees of LGBG Group are provided with equal and merit-based career opportunities regardless of gender, race, caste,

nationality, religion, age, physical condition, marital status, union membership/ affiliation/ activity, employment status or political affiliation;

- (b) The Group operates in full compliance to applicable wage, work hours, overtime, and benefits laws. The Group provides recognition based on performance and contribution of the employee towards The Group's success;
- (c) The Group provides a safe and healthy workplace environment for employees. The Group complies with applicable health and safety laws, regulations, and requirements. The Group is dedicated in maintaining a safe, productive workplace and strive to take every measure to prevent job-related injuries and illnesses.
- (d) We strive to provide a safe and mutually respectful workplace environment free from violence, harassment, humiliation and intimidation of any nature which includes but is not limited to physical, verbal, gesture and any other form;
- (e) The Group does not recruit child labour and is committed to strictly comply with applicable child labour laws as legislated under the Children and Young Persons (Employment) Act 1966. In the event The Group decides to incorporate young workers into The Group, it would be via various forms of internship programs and/or otherwise. The Group strictly condemns all forms of child exploitation, slavery and/or any forms which violate the children's rights;
- (f) The Group supports the elimination of forced labour, modern slavery, debt bondage and human trafficking. The Group takes the stand that the foregoing constitutes a severe violation of human rights and restriction of human freedom;
- (g) The Group respects freedom of association as part of our commitment to support fair and equitable treatment of The Group's employees regardless of gender, race, caste, nationality, religion, age, physical condition, marital status, union

membership/affiliation/activity, employment status or political affiliation;

(h) The Group's working hours are regulated under the employment contract with the respective employee, Malaysia Employment Act 1955 and/or the Employment (Limitation of Overtime Work) Regulations 1980; and

(i) The Group is committed to comply with the local statutory laws on minimum wages and ensures that all wages are paid in a timely manner.

(Reference: Human Rights Policy [<https://lbs.com.my/policies/human-rights-policy-2/>])

(ii) DIVERSITY

We are committed to inculcate diversity and equal opportunity in our workplace which allows us to gain a competitive edge through embracing workforce diversity as well as providing fair treatment to all our employees to foster improved morale and loyalty towards The Group.

The Group shall ensure that all employees receive equal and fair treatment based solely on merits and competency regardless of any form, whether based on gender, race, caste, nationality, religion, age, physical condition, marital status, union membership/affiliation/activity, employment status or political affiliation throughout the organisation. *(reference: Diversity Policy [<https://lbs.com.my/policies/diversity-policy/>] and Human Rights Policy [<https://lbs.com.my/policies/human-rights-policy-2/>])*

(iii) WORKPLACE HARASSMENT

The Group aims to provide a safe, healthy and harassment-free work environment for all employees as every employee should be treated with dignity, decency, and respect. To ensure a secure and comfortable workplace for the employees, this policy has been developed to reflect the Company's zero-

tolerance approach against all forms of unlawful discrimination or harassment in the workplace.

We treat harassment as a misconduct and shall be subject to The Group's Disciplinary Procedures. If the Investigation reveals evidence that supports the complaint and is eventually upheld, the harasser will be dealt with in accordance with the Disciplinary Procedures. (reference: *Workplace Harassment Policy* [<https://lbs.com.my/policies/workplace-harassment-policy/>])

(iv) DRESS CODE

All employees of The Group are required to project a professional outlook representing the Company. Therefore, employees must be suitably always attired as staff of The Group whilst at work. Employees are not allowed to wear clothing that is too revealing or cause uneasiness to other staff of the same or different gender, who observe reasonable standards of decency.

As such, it is important the employees must adhere to the following dress code :-:-

- (a) Male employees : Business shirt (long sleeve or short sleeve), long pants and dress shoes.
- (b) Female employees : Dress, blouse or a shirt matched with a skirt, ladies' business suit (with pants or skirt), and dress shoes.

(v) OCCUPATIONAL SAFETY AND HEALTH

The Group strives to create and promote a safe and healthy work environment for all employees, visitors, and related stakeholders. You are to comply with the Occupational Safety and Health Act 1994 (Act 514), as amended by the Occupational Safety and Health (Amendment) Act 2022 and all applicable requirements and regulations where we operate as set by The Group.

It is our collective responsibility to create a proactive working culture where all occupational safety and health risks associated with our daily business activities

are minimised to the lowest level as reasonably practicable. (Reference: *Occupational Safety and Health Policy* [<https://lbs.com.my/policies/occupational-safety-and-health-policy/>])

(vi) CORPORATE DISCLOSURE POLICY

The Group maintains a robust corporate disclosure framework to ensure transparency, and accountability to all its stakeholders including but not limited to shareholders, investors, analysts, media, regulatory authorities, and purchasers. The disclosures encompass several key areas such as our Integrated Annual Report (“IAR”), Sustainability Report (“SR”), Corporate Governance Report such as announcement to Bursa Malaysia, general meetings with shareholders, and press releases and updates.

Through these disclosures, The Group ensures stakeholders are well-informed about its financial health, governance standard, sustainability efforts and corporate developments

Accordingly, all The Group’s employees shall act in accordance to the following guidance: -

- a) For confidential information, all person involved, both internal staff, advisor or consultants engaged, must be explicitly informed about the importance of maintaining confidentiality;
- b) It is the responsibility of every employee handling confidential information to safeguard the security of that information and to take all necessary precautions to prevent leakage;
- c) Any person who possesses insider knowledge or undisclosed material information (“Insiders”), is prohibited from trading in The Group’s securities until after the information has been publicly disclosed. The provisions of the Listing Requirements, Capital Market Services Act 2009 and other relevant rules, regulations and act apply to all Insiders; and

- d) No comments on rumours or speculation, unless obliged to do so in compliance with the Listing Requirements. In cases of misinterpretations, clarification shall be provided via the appropriate channels to Bursa Malaysia.

(Reference: Corporate Disclosure Policy [<https://lbs.com.my/policies/corporate-disclosure-policy/>])

(vii) ENVIRONMENTAL POLICY STATEMENT

The Group has declared its unwavering commitment to comply with the environmental laws and regulations. Beyond compliance, we are dedicated to the relentless pursuit of continuous improvement in every facet of The Group's development project sites. We have taken this commitment a step further by actively raising awareness among The Group's internal and external stakeholders, fostering a collective sense of environmental responsibility.

(Reference: Environmental Policy Statement and Group Sustainability Policy [<https://lbs.com.my/policies/environmental-policy-statement/>])

6. SUSTAINABLE PROCUREMENT PRACTICES (OUR SUPPLY CHAIN) - to serve as a guide for suppliers in adopting and maintaining good business ethics

(i) GROUP SUSTAINABILITY POLICY

We recognise the importance of sustainability and its increasing relevant impact to the business. The Group aspires to integrate sustainable practices into its daily operations, balancing various needs and requirements of the local community and all stakeholders while improving environmental footprints and economic success, aligning The Group's commitment towards the United Nations Sustainable Development Goals ("UNSDGs").

The Group expects its external stakeholders especially the suppliers to also aspire the same standards to promote the integration of the Economic, Environmental, Social and Governance ("EESG") principles in their business operations. *(Reference: Group Sustainability Policy [[to insert link](#)])*

(iii) **GROUP SUSTAINABLE PROCUREMENT POLICY**

This policy serves as a guiding framework for The Group's procurement activities as well as the procurement practices of our supply chain partners and are applicable to all The Group's employees and external stakeholders including but not limited to intermediaries, suppliers, vendors, and business partners. The purpose of this policy is to support The Group's overarching strategy to ensure that the employees involved in any procurement of, including but not limited to goods, services and works, consider appropriate environmental, social, and economic factors in their procurement practices.

In accordance with The Group's commitment to implement best practice on sustainable procurement, The Group also expects all its external stakeholders to aspire the similar standards in their business operations. (*Reference: Group Sustainable Procurement Policy* [<https://lbs.com.my/policies/group-sustainability-policy/>])

Prior to any onboarding, our suppliers are also required to read, understand, and adhere to our Anti-Bribery and Corruption Policy, Whistle Blowing Policy, Gift, Entertainment and Hospitality Policy, Donations and Sponsorship Policy, Human Rights Policy, and Group Sustainability Procurement Policy in its entirety. Further, our suppliers shall also demonstrate full cooperation during our due diligence process. This includes providing accurate and complete information, maintaining transparency, and upholding ethical standards that align with our operational principles.

7. COMPLIANCE OF LAW AND GOVERNANCE - to uphold legal and ethical standards)

The Group is committed to adhering all applicable laws, regulations, and requirements set by relevant authorities. It is your responsibility to stay informed and take necessary actions to ensure compliance with the laws, rules, and regulations relevant to your role and responsibilities.

(i) ACCURACY AND INTEGRITY OF FINANCIAL INFORMATION

You are responsible to ensure that The Group's financial statements are prepared promptly, accurately, and in compliance with the Generally Accepted Accounting Principles ("GAAP") and applicable accounting standards. You shall also ensure that The Group's books and records accurately, fairly, and reasonably reflect the true nature of the transactions.

It is essential to adhere to The Group's accounting policies and internal control requirements in all financial matters. Any deliberate misrepresentation of information or activities in The Groups' documents or reports may be considered as falsification or fraud, which is a serious offence.

The Group reserves the right to report any suspected criminal misrepresentation to any law enforcement or authorities. Falsifying any financial records, or misrepresenting information may constitute fraud and may result in civil and/or criminal liabilities for Directors, employees, and The Group. You are obligated to report any false entries, omissions, or suspicious accounting practices in The Group's books and records to the relevant parties.

(ii) INTERNAL CONTROLS AND RECORD MANAGEMENT

The Group's documents and records are intended solely and strictly for business purposes and must comply with all legal, tax, accounting, and regulatory requirements. You are responsible for managing and maintaining these records to ensure they are accurate, up-to-date, legible, easily identifiable, and readily accessible.

Additionally, all records, must be handled with strict confidentiality, adhering to applicable policies, procedures, and relevant laws and regulations. (*reference: LBS Employee Handbook*)

(iii) PROPRIETARY AND CONFIDENTIAL INFORMATION

You are obligated to exercise caution and diligence in protecting information that is confidential and sensitive in nature related to The Group which you acquired or will be acquiring during your employment. Disclosure, whether directly or indirectly to any third party, any of such information such as the Company's trade secrets, confidential operations processes or dealings, or any information concerning the business, finances, transaction, or affairs which may come to your knowledge during your employment or dealings with The Group is strictly prohibited unless explicitly authorised or legally required.

If you become aware of any material information that could impact The Group that has not been publicly disclose, you must keep it strictly confidential until it is officially released. In addition, proprietary or confidential information should only be shared with other employees on a need-to-know basis.

Your obligation to safeguard proprietary and confidential information continues even after your employment or appointment ends unless disclosure is required by any order from the court of competent jurisdiction, government, or relevant authorities. Any violation of this may result in civil and/or criminal actions. *(reference: LBS Employee Handbook)*

(iv) PRIVACY POLICY AND PERSONAL DATA PROTECTION

The Group is committed to ensuring your Personal Data is stored securely. To prevent unauthorised access, disclosure, or other similar risks, we endeavour, where practicable, to implement appropriate technical and organisation measures in accordance with the applicable laws such as the Personal Data Protection Act 2010 ("PDPA Act") to safeguard against and prevent unlawful processing of your Personal Data.

In event you have access to any personal data, you are expected and required to read understand our PDPA Notice, which is created to assist you in handling any personal data in the manner which comply with the PDPA Act. The PDPA Notice provides a comprehensive guidance on the responsible handling of persona data in compliance with the PDPA, including detailed instructions on

data management, retention, and disposal thereof. (Reference: *Privacy Policy* [<https://lbs.com.my/pdpa-notice/>])

8. INFORMATION TECHNOLOGY - to enhance efficiency through reliable and ethical digital practices

(i) INTERNET ACCESS

Access to restricted websites related to gambling, illegal trade, auction, pornography are strictly prohibited. No adult material is allowed to be stored, transferred, coded, or downloaded into any desktop PCs, notebooks, or storage media of The Group. Stern disciplinary action will be taken against offenders. (Reference: *LBS Employee Handbook*)

(ii) DATA PRIVACY AND CYBERSECURITY

The Group places a high priority on safeguarding customers' data privacy and confidentiality of its customers' data. We comply with the Personal Data Protection Act 2010, by collecting only relevant data with explicit consent and using it solely for engagement purposes. We do not share or sell with or to any third party, except where required by authorities.

Our cybersecurity framework is based on four key pillars: preventive, detective, corrective, and recovery. Our goal is to uphold cybersecurity excellence, protect digital assets, and foster a secure business environment.

All employees are expected to help safeguard our digital infrastructure, stay vigilant against cyber threats, and promote a culture of security awareness. (Reference: *LBS SR2023* [<https://lbs.com.my/wp-content/uploads/Sustainability-Report-2023.pdf>]).

(iii) SECURITY VIOLATIONS AND INVESTIGATIONS

Any unauthorised attempts to access restricted sites or other reported security violations will be investigated and may result in disciplinary action. The Group reserves the right to conduct investigations and access the contents of users'

desktop PC, notebooks, or storage media at any time without prior notice.
(reference: *LBS Employee Handbook*)

(iv) INTELLECTUAL PROPERTY

Any inventions, designs, trademarks, trade secrets, patents, copyrights, or other intellectual property (“IP”) created, developed, or conceived by you during your employment that relate to The Group’s business shall be the exclusive property of The Group.

Employees of The Group are obligated to respect and protect ’s IP. Without prior written consent, employee or you must not reproduce, adapt, modify, use, or disclose any such IP to any third party, except to authorised persons as instructed by the Company.

9. NON-COMPLIANCE OF THE LAWS, REGULATIONS AND THE CODE

All internal stakeholders and external stakeholders of The Group are to comply with all Federal and State laws, rules, and/or regulations applicable to your work and responsibilities. If you are found to have violated any of the applicable laws, rules and regulations, disciplinary action, including but not limited to termination of employment, contracts and/or appointment shall be taken.

Non-compliance of the laws, regulations and the Code will be treated with utmost seriousness and may lead to disciplinary action, including but not limited to termination of employment, and/or initiation of civil or criminal proceedings against you.

The Group reserves the right to report any actual or suspected breach of applicable laws, regulations, or regulatory requirements to the relevant authorities. Such reporting may be undertaken without prior notice to the party involved, where deemed necessary to comply with legal obligations or to protect the interest of The Group and its stakeholders.

10. REPORTING OF VIOLATIONS OF THE CODE

If you become aware of any actual or potential violations of the Code, you are expected to promptly report your concerns to The Group through our Whistleblowing channel. This platform enables you to report any improper conduct in accordance with the procedures and provides protection from any reprisal as consequences of making such disclosure.

A disclosure of Improper Conduct shall be made to the Investigating Team in writing by completing the Whistleblowing Form. The form shall be emailed to ***whistleblowing@lbs.com.my*** which is accessible by all the Designated Persons in the Investigating Team, or hand over to the Designated Persons or post/courier to :

LBS BINA GROUP BERHAD
The Whistleblowing Investigating Team
Level 1-4, Plaza Seri Setia, No.1, Jalan SS9/2, 47300 Petaling Jaya,
Selangor.

(Reference: Whistleblowing Policy [<https://lbs.com.my/policies/whistle-blowing-policy/>])

11. REVIEW OF THE CODE

The Code shall be reviewed every two years and may be evaluated by the Board whenever necessary to always ensure its continued relevance and effectiveness.

12. DEFINITION

TERMS	DESCRIPTIONS
“Code of Business Conduct and Ethics”	refer to as “The Code” which is a set of guidelines that outlines the company’s standards for ethical behaviour, legal compliance, and professional conduct expected from all internal and external stakeholders.
“Internal stakeholders”	refer to individuals within The Group who are directly engaged in or affected by its operations and ethical conduct. This includes all employees, senior management, and Board of Directors.
“External stakeholders”	refer to individuals, groups, or organizations outside The Group who are affected by, or have an interest in The Group’s activities, decisions, and ethical conduct. This includes, but not limited to intermediaries (<i>which are entities that facilitate The Group’s business activities such as contractors, agents, wholesalers, distributors, and retailers</i>), suppliers (which are entities within The Group’s upstream supply chain that provide goods and/or services to The Group) brokers, consultants, distributors, independent contractors, licensees, manufacturers, and subcontractors.
“United Nations Sustainable Development Goals” (SDGs)	refer to a set of seventeen (17) global objectives adopted in 2015 to end poverty, protect the planet, and ensure peace and prosperity for all by 2030. It is a shared blueprint for countries to balance social, economic, and environmental sustainability.