COMPUGATES®

# COMPUGATES HOLDINGS BERHAD

## CODE OF ETHICS

Reviewed and Adopted by Board of Directors on 27 Nov 2025

The Group has in place codes of ethics for Directors and employees based on four elements which are sincerity, integrity, corporate and fiduciary responsibilities. In the performance of the directors' duties, the Board / employees should at all times observe the following codes:

a. Have a clear understanding of the aims and purposes, capabilities and capacity of the Company;

b. Devote time and effort to attend meetings and know what is required of the Board and each of its Directors, and to discharge those functions;

c. Ensure at all times that the Company is properly managed and effectively controlled;

d. Stay abreast of the affairs of the Company and be kept informed of its compliance with the relevant legislation and contractual requirements;

e. Insist on being kept informed on all matters of importance to the Company in order to be effective in corporate management;

f. Have access to the advice and services of the Company Secretary, who is responsible to the Board to ensure proper procedures, rules and regulations are complied with;

g. Exercise their powers for the purposes they were conferred, for the benefit and prosperity of the Group;

h. Disclose immediately all contractual interests whether directly or indirectly with the Group. Avoid situations that may give rise to actual, potential or perceived conflicts of interest and declare such interests promptly to the Board;

i. Shall neither divert to their advantage any business opportunity that the Group is pursuing, nor use confidential information obtained by reason of their office for their own advantage or that of others;

j. With utmost good faith towards the Company in any transaction and to act honestly and responsibly in the exercise of their powers in discharging their duties;

k. Be conscious of the interest of shareholders, employees, creditors and customers / clients of the Group;

l. Promote professionalism and improve the competencies of management and employees.

m. Ensure adequate safety measures and provide proper protection to workers and employees at the workplace.

n. Ensure the effective use of natural resources, and improve quality of life of employees and the community at large by promoting corporate social responsibilities.