



Linergy Power Sdn. Bhd.

## Business Ethics Policy

### 1. Purpose

To enhance the level of business ethics management at Linergy Power Sdn. Bhd. (hereinafter referred to as “the Company” “we” or “Linergy”) and to reduce associated risks, this policy has been established. This policy outlines Am-pace’s principles regarding the prohibition of commercial bribery, prevention of conflicts of interest, anti-fraud measures, anti-money laundering efforts, opposition to unfair competition, information security, and privacy protection, among others, and clarifies the overall requirements for the Company. This policy aims to establish procedures for business ethics management, to handle incidents related to business ethics, and to guide employees in understanding and protecting the Company’s integrity and viability in terms of business ethics.

### 2. Scope of Application

Applies to all members of Linergy and its subsidiaries and branches (including directors, supervisors, senior management personnel, managers in charge of various departments, and employees), as well as partners.

### 3. Organizational Structure

The Company has established a “Code of Conduct Committee (COC)” which is directly under the jurisdiction of the Linergy Board of Directors. The chairperson of the COC is appointed by the Board of Directors and is accountable to it directly. The committee members are composed of heads from the Legal Affairs Department, Human Resources Department, President Support Office, and Purchasing and Supply Chain Management Department. A “COC Advisory Office” is also set up under the committee to oversee the specific implementation of this policy and to conduct regular reviews.

### 4. Anti-bribery and Combating Corruption

4.1 The Company strictly complies with the United Nations Convention against Corruption and the Foreign Corrupt Practices Act (FCPA). For individuals holding sensitive positions that are particularly prone to corruption, measures are taken to prevent such occurrences. Accounting and auditing standards are reinforced, and effective, appropriate, and deterrent civil, administrative, or criminal penalties are prescribed as appropriate for any non-compliance with these measures.

4.2 The Company strictly complies with relevant laws and regulations against commercial bribery. No member of Linergy shall offer any illegal or improper benefits to domestic or foreign government officials in relation to work performance.

4.3 The Company strictly enforces the “Six Prohibitions”:



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- (a) It is strictly prohibited to receive or give gifts or cash in violation of laws and company regulations
- (b) It is strictly prohibited to have any shareholding, hidden shareholding, or cooperative management with suppliers or other partners.
- (c) It is strictly prohibited to engage in any acts that violate the Company's property, such as embezzlement of duties, misappropriation of funds, or occupation of public assets.
- (d) It is strictly prohibited for employees or their relatives to accept benefits from suppliers or other partners by taking advantage of their positions.
- (e) It is strictly prohibited to take advantage of one's position to accept, in violation of company regulations, arrangements for meals, travel, entertainment or lodging provided by suppliers or other partners for employees and their relatives.
- (f) It is strictly prohibited to disclose any confidential information of the Company.

**4.4 Linergy commits to taking the following measures to prevent bribery and corruption :**

- (a) Regularly organize integrity promotion activities, training sessions, and examinations to enhance the awareness of integrity among all employees.
- (b) Establish and improve the Company's internal control system, and strengthen supervision and auditing of key areas such as finance, procurement, and sales.
- (c) Each department appoints supervisors for integrity and self-discipline to comprehensively oversee and promote the department's efforts in building a culture of integrity.
- (d) Encourage both internal and external stakeholders to report and complain about corrupt activities, and provide protection and rewards for those who do so.
- (e) Sign Integrity Agreements with relevant parties such as employees and suppliers, clearly defining the standards and requirements for integrity.

## **5. Prevent Conflicts of Interest**

**5.1** All members of Linergy shall avoid any situation that may involve, or has already involved, a conflict of interest between their personal interests and those of Linergy. In their interactions with current and potential customers, suppliers, contractors, and competitors, Linergy members must set aside their personal interests and prioritize the highest interests of Linergy.

**5.2** Each Linergy member shall declare any family relationships to the Company and must promptly provide a full written disclosure to their supervisor or manager whenever a



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situation involving a potential or actual conflict of interest is identified. Situations involving a conflict of interest include:

- (a) The employee or a family member has a significant interest in external companies that have business dealings with Linergy (or wish to establish business relationships with Linergy) or that are competitors of Linergy.
- (b) Employees or their family members hold positions such as directors, senior staff, partners, consultants, or other key roles in external companies that have business dealings with Linergy (or intend to establish business relationships with Linergy), or that are competitors of Linergy.
- (c) The employee himself/herself or a member of his/her family acts as a broker, finder, or other intermediary for third-party interests in transactions involving Linergy or its interests.
- (d) Other circumstances, including family or personal relationships that may prevent the employee from bringing the greatest benefit to Linergy.

## **6. Combating Fraud**

6.1 The Company resists any form of fraudulent behavior. No employee of Linergy may, in their business activities, mislead or deceive others by means of fabricating or concealing information, distributing false data, signing fraudulent contracts, or engaging in exaggerated promotional practices, with the intent of obtaining undue benefits.

6.2 Common fraudulent practices include, but are not limited to: falsifying accounts, overstating expenses, misappropriating public funds, manipulating data, collusive bidding, bid rigging, insider trading, forging contracts, privately engraving official seals, and issuing false invoices to obtain funds for team activities.

## **7. Anti-money Laundering**

7.1 The Company adopts a zero-tolerance stance towards money laundering activities and has established strict mechanisms for prevention, detection, and re-reporting to ensure that its business operations comply with international Anti-Money Laundering (AML) regulations and Malaysian's Anti-Money Laundering Law, thereby maintaining financial order and social justice.

7.2 Linergy employees must strictly comply with anti-money laundering regulations and conduct appropriate due diligence on business partners as well as on any property received by the Company (such as funds, goods, raw materials, equipment, etc.). If any suspicious issues regarding the ownership of business partners or payment transactions are identified, they must be reported promptly to the legal and finance departments. It



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is essential to avoid receiving illegal funds or participating in activities and transactions involving such funds.

## **8. Maintaining and Promoting Fair and Free Competition**

8.1 The Company strictly complies with the Competition Law of Malaysia, explicitly prohibiting employees from using methods such as commercial espionage, bribery, theft, or eavesdropping to obtain competitive intelligence, or from maliciously spreading false information regarding competitors or their products and services. The Company is committed to maintaining a healthy economic development environment, resolutely upholding fair competition, and eliminating any form of unfair competitive practices.

8.2 The Company consistently strives to create a diverse and inclusive work environment and continues to build a workforce that is both diverse and varied in its makeup.

## **9. Information Security and Personal Privacy Protecting**

9.1 Linergy establishes an information security system in accordance with the ISO/IEC 27001 standard, and all employees are required to consciously comply with the Company's information security management regulations.

9.2 All non-public information related to Linergy, its business, employees, customers, and suppliers is considered confidential information. Linergy employees are entrusted with the use of this confidential information, which may only be used for the intended business purposes of Linergy. Members of Linergy are not permitted to share confidential information with anyone outside of Linergy, including family members and friends, nor with individuals who do not need such information for their work. All members of Linergy are required to sign a Non-Disclosure Agreement and must fulfill their obligations of confidentiality, both while employed and after leaving the Company. Any public or media communication involving Am-pace must obtain prior approval from the senior management of the relevant Am-pace organizations. Confidential information includes, but is not limited to:

- (a) Material information and non-public financial data regarding Linergy.
- (b) Trade secrets, including business and technical information such as procedures, methods, technologies, compilations, and information that is valuable because it is not generally known.
- (c) Inventions and processes that are deemed to be service inventions under the applicable laws regarding intellectual property rights, are owned by Linergy, and were developed by Linergy employees using Linergy equipment or trade secrets during their employment with Linergy or in work related to Linergy's business.
- (d) Proprietary information, such as customer lists.



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(e) Other non-public information.

9.3 It is strictly prohibited for Linergy employees to:

- (a) Seeking personal gain by taking advantage of business opportunities uncovered through Linergy's properties, contact lists, information, or job positions.
- (b) Accepting or engaging in business activities (including consulting or similar work) that may affect their performance or responsibilities at Linergy, or the commercial interests of Linergy.
- (c) To request, demand, accept, or agree to accept anything of value from anyone related to one's performance or responsibilities at Linergy.
- (d) Participate in any transactions on behalf of Linergy that may result in direct or indirect financial benefits for Linergy or its immediate family members.

9.4 The Company respects the privacy of each employee and takes careful measures to properly manage their personal information. We commit to using employee's information only for compliant purposes that have been clearly communicated to them, and we implement strict technical and managerial measures to ensure data security. Without the employee's authorization, we will not disclose personal information to any third parties, except in cases required by laws and regulations. Additionally, we regularly review and optimize our personal information management systems to continuously improve the level of protection for employees' personal data.

## **10. Rewards and Punishments**

10.1 For any violations of this policy, disciplinary actions will be taken in accordance with the Employee Handbook, Employee Discipline Management Rules, and Code of Conduct. In serious cases, the matter may be referred to the judicial authorities by COC committee.

10.2 Employees who voluntarily admit to violations will be given a lighter punishment, and such voluntary admission will be taken into consideration as a factor for mitigating the disciplinary action.

10.3 The Company has established a whistleblowing reward fund, which is managed by the COC Consulting Office. The amount of the reward is determined based on the nature of the alleged violations or criminal acts, the circumstances involved, and the value of the information provided by the whistleblower.

## **11. Supervise Transparency**



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- 11.1 Linergy has established a consultation hotline and email address to enable its employees, partners (customers, suppliers, etc.), as well as members of the public, to submit complaints, reports, opinions, or inquiries to the COC Consultation Office.
- 11.2 The informant must ensure the accuracy of reported facts; they shall not falsely accuse others or distort the facts.
- 11.3 The department responsible for receiving reports must respond promptly and follow the Company's rules to handle the matter accordingly. At the same time, it is essential to maintain confidentiality regarding both the report information and the person who made the report. Any act of disclosing the identity of the reporter or retaliating against them will be dealt with seriously.

## **12. Policy Signing**

All members of Linergy are required to solemnly commit by signing the Integrity Agreement and Confidentiality Contract.