

CODE OF CONDUCT AND ETHICS

Introduction

In pursuant with Practice 3.1 Malaysian Code on Corporate Governance 2021, this Code of Conduct and Ethics (“Code”) is formalised to articulate acceptable practices and guide the behaviour of directors, management and employees of Apollo Food Holdings Berhad and its subsidiaries (“Apollo Group”). This Code includes fundamental guiding principles and standards to encourage ethical behaviours practiced by Apollo Group over the years.

This Code is not intended to be exhaustive and it should be read in conjunction with the existing framework of all relevant laws and regulations. There may be additional obligations that directors and employees are expected to behave and conduct when performing their duties.

Ethical Principles

This Code is formulated based on below principles:

- **Integrity**

The directors, management and employees shall have the quality of being honest and having strong moral principles when discharging their duties.

- **Accountability**

The directors, management and employees shall own the quality of being accountable and responsible on the jobs or authorities assigned.

- **Duty to Act in the Public Interest and Best Practices of the Company**

All employees of Apollo Group have statutory duty to act in the public interest to prevent any negative loss on company’s reputation. Further, directors and board members have statutory duty to ensure the maintenance of fair, orderly and transparent market.

Code of Conducts

The Code covers the following areas:

I. Compliance with Laws, Rules and Regulation

Apollo Group is committed to comply with relevant laws, rules and regulations that govern the conduct of the business. Failure to comply with laws and regulation will result fines, penalties, damages and losses to the Company. As Apollo Group is operating in food industry, any non-compliance with laws and regulations will cause negative image to Apollo Group’s operation.

Directors, management and employees shall familiarise themselves on relevant laws and regulation to prevent any potential losses bring to the Company. If there is any

noncompliance issue in the workplace:

- Employees shall highlight the issue immediately to supervisor or head of department.
- Directors and management shall discuss the issues and settle the issues as soon as possible.

II. Conflict of Interest

A conflict of interest is a situation in which a person is involved in multiple interests, either direct or indirect, one of which could possibly corrupt the motivation or decision making of the person against what is the best for the organisation. Conflict of interest may arise when you, a family member or a friend:

- Engage in activities that compete with Apollo Group's interests
- Use Apollo Group's property and information for personal benefit or the benefit of others
- Have outside employment that negatively affects your job performance
- Have a financial interest in or receive any personal benefit from a supplier, customer, competitor, or a company that wish to do business with Apollo Group

Directors, management and employees are obligated to disclose any potential or actual conflict of interest promptly so that conflicts can be solved in time. If there is any conflict of interest arise:

- Employees shall bring up the conflict of interest to head of departments or management for their attention. Material conflict of interest will be discussed by the management for a solution.
- Management shall highlight any material conflict of interest to board of directors for their attention and solution.
- Directors must disclose any potential or actual conflict of interest to the board members and notify company secretary for their further action and solution.

III. Anti-Corruption

Corruption is a form of dishonest or unethical conduct by a person entrusted with a position of authority to acquire for personal gain. This includes bribery, extortion, kickbacks, corrupt payments, facilitation payments, and inappropriate gifts to government officials or any commercial person or commercial entity.

Apollo Group prohibits any form of corruption as corrupt activities not only a code violation but also a violation of the Malaysian Anti-Corruption Commission Act practiced in Malaysia. If there is any form of corruption aware in the workplace:

- Employees shall bring up the issues to the higher management for their attention.
- Management shall bring up the issues, if the issues are material to the Apollo Group's reputation, to the board of directors for their actions.
- If there is any form of corruption practiced by any of the directors, the board members shall bring up the issues to the relevant regulatory body and seek for their advices and solutions.

IV. Confidentiality

Directors, management and employees might acquire certain information about Apollo Group, its customers, suppliers, or business partners that is confidential, competitively sensitive and proprietary during their employment. Confidential information includes non-public information that you are expected to safeguard from disclosure to the public.

Confidential and proprietary information can be in physical form (paper, email, or diskette) or in verbal form (conversations to which you are a party or that you overhear). Directors, management and employees shall maintain confidentiality of information entrusted to them unless this is specifically required to disclose under laws and regulations. The following practices should be followed to help prevent the misuse of confidential information:

- Avoid discussing confidential matters in places where you may be overheard by people who do not have a valid need to know such information
- Always put confidential documents away when not in use
- Avoid unnecessary copying of confidential documents
- Use shredders to dispose confidential documents
- Never distribute internal use only documents outside the company
- Refer request for information on Apollo Group's financial and investment information from financial community, regulators, or media and press to Executive Directors

If employees are uncertain as to whether the information is confidential, employees shall seek advices from supervisor or management for guidance. Management shall seek advices and solutions from directors if material confidential information is believe to disclose to somebody who does not have a valid to know it.

Confidentially also includes insider trading and improper use of company's assets as elaborated below:

- **Insider Trading**

Insider Trading is the trading of a public company's stocks or securities by individuals with access to non-public information about the company for personal interests. Under section 188 of Capital Markets & Services Act 2017, a person who is involve in insider trading can face an imprisonment of up to 10 years and a fine of at least RM1 million.

The directors, management and employees of Apollo Group shall not disclose any material non-public information to third parties who may trade stocks or securities based on the information given as this will result unforeseen losses to Apollo Group. Persons who hold higher positions in Apollo Group has to be more aware especially during the conversation with third parties to prevent the use of non-public information by others for stocks or securities trading.

Apollo Group also prevent the use of non-public information by own directors, management and employees for personal gain. Disciplinary actions will be taken on this illegal practice. Any illegal practices shall report by the employees immediately to the top management and board members.

- **Improper Use of Company's Assets**

Fraud, theft, abuse or improper use of company's resources and assets are unacceptable in Apollo Group as these practices will cause waste of assets and direct impact to the company's profitability. The company's resources and assets include facilities, supplies, equipment, machineries, spare parts, raw materials, vehicles, company funds, company times, intellectual property, and information systems.

All employees including the directors shall protect the Apollo Group's assets, either tangible or intangible, to ensure the assets and resources are used efficiently. Examples of improper use of company's resources and assets are:

- Use company's vehicles for unauthorised personal transportation needs
- Resell scraps or wastes for personal gain
- Charge unauthorised personal expenses on company's expenses
- Take products or supplies for personal use

Employees shall report to their head of department if there is any improper use of company's resources and assets aware in the workplace. The same responsibility goes to the management and directors.

Review

This Code will review by the Board when deemed necessary to ensure the Code is in line with Apollo Group's objectives.

This Code is reviewed and approved by the Board on 29 March 2022.