SENDORA GROUP SDN. BHD.
[200901030134(873240-K)]

CODE OF CONDUCT

CORPORATE POLICY

Document number	SGR/COC/001
Version	1.0
Document status	Approved
Policy owner	Managing Director
Approved by	Wong Wei Xiang (Managing Director)
Approval date	03 January 2026
Effective date	03 January 2026
Next review date	02 January 2028

1.0 PURPOSE

This Code of Conduct ("Code") sets out the standards of behaviour expected of all persons working for Sendora Group Sdn. Bhd. ("Company"). It supports a workplace and business culture based on integrity, accountability, respect, fairness and compliance with applicable law.

The Code provides practical principles for day-to-day decisions. It does not replace applicable law, an employment contract or a more specific Company policy. Where a stricter lawful requirement applies, that requirement must be followed.

2.0 SCOPE AND APPLICATION

This Code applies to:

- all directors, officers, managers and employees of the Company, including temporary, probationary, part-time and contract personnel;
- interns, trainees, secondees and any person working under the Company's direction or control; and
- conduct at Company premises, during working time, on business travel, at Company functions, when using Company systems, and whenever a person represents or may reasonably be associated with the Company.

Contractors, suppliers, agents, distributors, consultants and other business partners are expected to observe equivalent standards when dealing with or acting for the Company. Specific contractual or policy obligations may also apply to them.

3.0 OUR CORE PRINCIPLES

Everyone covered by this Code is expected to:

- act honestly, ethically and in the Company's legitimate interests;
- treat colleagues, customers, suppliers and the public with dignity and respect;
- comply with applicable laws, Company policies and authorised instructions;
- protect the Company's reputation, information, property and resources;
- make decisions fairly and without improper personal influence;
- speak up promptly when misconduct or a risk to the Company is suspected; and
- take responsibility for their actions and cooperate with legitimate reviews or investigations.

4.0 RESPONSIBILITIES

Board and top management: approve this Code, demonstrate ethical leadership, provide appropriate resources and oversee material conduct risks.

Managers and department heads: explain the Code, lead by example, maintain suitable controls, address concerns fairly and escalate serious matters promptly.

All personnel: read and follow the Code, ask when unsure, complete required declarations or training, and report suspected breaches in good faith.

5.0 COMPLIANCE WITH LAW AND COMPANY POLICIES

Personnel must comply with all laws and regulatory requirements relevant to their duties, including applicable requirements concerning employment, workplace safety, anti-bribery and corruption, competition, personal data, consumer dealings, taxation and financial records.

Personnel must also comply with Company policies, procedures, approval limits and lawful instructions. A person who is uncertain about a legal or policy requirement must seek guidance from a manager or the relevant authorised person before acting.

6.0 RESPECTFUL AND FAIR WORKPLACE

The Company is committed to a professional workplace in which people are treated with dignity and respect. Employment-related decisions should be based on legitimate business requirements, merit, performance, qualifications and other lawful considerations.

The following conduct is not acceptable:

- harassment, sexual harassment, bullying, intimidation, humiliation or victimisation;
- unlawful discrimination or unfair treatment;
- threats, fighting, violence or deliberate damage to property;
- abusive, insulting, obscene or persistently disruptive behaviour; and
- retaliation against a person who raises a concern or participates in an investigation in good faith.

Managers who become aware of possible harassment, violence or other serious misconduct must act promptly and refer the matter through the appropriate Company process.

7.0 PROFESSIONAL CONDUCT AND WORK RESPONSIBILITIES

Personnel must:

- perform their duties carefully, competently, honestly and within their authority;
- attend work punctually and comply with attendance, leave and reporting requirements;
- follow reasonable and lawful instructions and maintain proper cooperation with colleagues;
- deal courteously and truthfully with customers, suppliers and other stakeholders;
- maintain a professional appearance appropriate to their role and workplace; and
- not work while impaired by alcohol, illegal drugs or any substance that makes the person unsafe or unfit for duty.

Possession, use, sale or distribution of illegal drugs at Company premises or during Company activities is prohibited. Alcohol may only be consumed where specifically permitted and must never affect safety, judgement, attendance or performance.

8.0 HEALTH, SAFETY AND SECURITY

Everyone must take reasonable care of their own health and safety and that of others who may be affected by their actions. Personnel must follow safety procedures, use required protective equipment, attend required training and report hazards, injuries, unsafe conditions and security incidents promptly.

No person may bypass a safety control, interfere with safety equipment, conceal an incident or instruct another person to work in an unsafe manner. Any person who reasonably believes there is an immediate and serious danger should stop the activity, move to safety and notify the responsible manager without delay.

9.0 ANTI-BRIBERY AND CORRUPTION

The Company has zero tolerance for bribery and corruption. No person may offer, promise, give, request, receive or authorise a bribe, kickback, secret commission, facilitation payment or other improper advantage, directly or through another person.

All personnel must comply with the Company's Anti-Bribery and Corruption Policy (SGR/ABC/001), including its requirements on gifts, hospitality, business associates, accurate records and reporting concerns.

10.0 GIFTS, HOSPITALITY AND ENTERTAINMENT

Gifts, meals, entertainment, travel and hospitality must never be used to influence, reward or appear to influence a business decision. Cash and cash equivalents must not be offered or accepted.

Prior written approval, declarations and records must be completed as required by SGR/ABC/001. Particular care is required during tenders, quotation evaluations, contract negotiations, disputes and dealings with public officials.

11.0 CONFLICTS OF INTEREST

Personnel must avoid situations in which personal, family, financial or outside interests conflict, may conflict, or appear to conflict with the Company's interests. A conflict is not necessarily misconduct, but failing to disclose and manage it may be.

Examples include:

- participating in a decision involving a relative, close friend or personal associate;
- having a financial interest in a supplier, customer, competitor or contractor;
- accepting outside work that competes with, disrupts or improperly uses the Company's time or resources;
- using a Company opportunity, position or information for personal gain; and
- directing Company business to a connected party without transparent disclosure and approval.

Actual, potential or perceived conflicts must be declared promptly to the person's manager or the Managing Director. The person must not take part in the relevant evaluation, negotiation, approval or decision until appropriate safeguards have been documented.

12.0 FAIR DEALING, CUSTOMERS AND BUSINESS PARTNERS

Personnel must deal honestly and fairly with customers, suppliers, contractors, competitors and other stakeholders. Products, services, prices, warranties, capabilities and commitments must be described accurately. No person may mislead, conceal material information, misuse confidential information or take unfair advantage through manipulation or improper pressure.

Supplier and contractor selection must be based on legitimate commercial considerations and follow the Company's procurement, quotation, approval and due-diligence requirements. Personal preference or benefit must not influence a selection.

13.0 FAIR COMPETITION

The Company competes independently and fairly. Personnel must not agree or coordinate with competitors on prices, discounts, customers, territories, bids, production or other competitively sensitive matters. They must not exchange confidential commercial information with competitors unless a lawful purpose has been reviewed and approved.

Any approach by a competitor involving bid coordination, market sharing, price fixing or another suspicious arrangement must be rejected and reported immediately.

14.0 CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

Personnel must protect confidential information belonging to the Company and to customers, employees and business partners. Confidential information includes non-public commercial, financial, technical, pricing, design, product, customer, supplier, employee and strategic information, whether in paper, verbal, electronic or other form.

Personnel must:

- access and use confidential information only for authorised work purposes;
- share it only with persons who are authorised and have a legitimate need to know;
- store, send and dispose of it securely;
- avoid discussing sensitive matters in public or unsecured places; and
- return Company information and materials when requested or when employment ends.

Intellectual property created, obtained or used in the course of work must be protected and handled in accordance with contractual and legal requirements. Third-party materials, software, images and designs must not be copied or used without proper authority.

15.0 PERSONAL DATA AND PRIVACY

Personal data must be collected, accessed, used, disclosed, retained and disposed of only for legitimate and authorised purposes and in accordance with applicable data-protection requirements and Company procedures.

Personnel must limit access to those who need the information, apply appropriate security, avoid unauthorised copying or sharing, and report any suspected loss, misuse, disclosure or security breach promptly. Personal data must not be used for personal benefit or curiosity.

16.0 COMPANY ASSETS, SYSTEMS AND TECHNOLOGY

Company money, products, inventory, equipment, vehicles, facilities, records, accounts, passwords, software, email and other resources must be used responsibly, securely and mainly for authorised business purposes. Limited personal use is permitted only where allowed, reasonable and not disruptive, unlawful or costly to the Company.

Personnel must not:

- steal, misuse, damage, conceal or remove Company property without authority;
- share passwords, disable security controls or install unapproved software;
- use Company systems to access, create or distribute unlawful, offensive, discriminatory or sexually explicit material;
- conduct unauthorised business, political campaigning or excessive personal activity using Company resources; or
- enter confidential or personal data into public artificial-intelligence services or other unapproved tools.

Use of Company systems may be monitored, accessed or reviewed for legitimate business, security and compliance purposes, subject to applicable law and Company procedures.

17.0 ACCURATE RECORDS AND FINANCIAL INTEGRITY

All business records, claims, invoices, orders, inventories, expenses, working-time records, accounts and approvals must be complete, accurate, timely and supported by genuine documentation. No person may create or approve a false or misleading record, conceal a transaction, maintain an undisclosed fund or deliberately bypass an approval or control.

Records must be retained and disposed of according to legal and Company requirements. Documents relevant to an audit, investigation, dispute or legal hold must be preserved.

18.0 COMMUNICATIONS, SOCIAL MEDIA AND PUBLIC STATEMENTS

Only authorised persons may speak, publish or make commitments on behalf of the Company. Business communications must be accurate, professional and respectful. Personnel must not disclose confidential information, personal data or internal matters through social media, messaging platforms or other public channels.

When expressing personal views, personnel must not suggest that they represent the Company. Use of the Company's name, logo, images, premises or products for external publication requires appropriate authority.

19.0 POLITICAL, COMMUNITY AND OUTSIDE ACTIVITIES

Personnel may participate in lawful political, community, charitable or professional activities in their personal capacity, on their own time and at their own expense. They must not use Company funds, resources or identity, or imply Company support, unless formally authorised.

Outside employment, directorships or business activities must not compete with the Company, create a conflict, misuse confidential information or materially interfere with work duties. Relevant conflicts must be declared before the activity begins.

20.0 ENVIRONMENTAL RESPONSIBILITY

Personnel must comply with applicable environmental requirements and Company procedures, use materials and energy responsibly, prevent avoidable waste or pollution, and report spills, improper disposal or other environmental concerns promptly.

21.0 REPORTING CONCERNS

Anyone who knows of or reasonably suspects misconduct, an unsafe practice, retaliation or a breach of this Code should raise the concern promptly with a manager, department head, Human Resources or either of the following Designated Directors:

Reporting contact	Director 1	Director 2
Name and title	Wong Wei Nian (William)	Wong Wei Xiang (Lance)
Email	sendora.williamwong@gmail.com	sendora.lance@gmail.com

Concerns may also be reported confidentially through the Company's dedicated Integrity Reporting Channel at:

integrity.sendora@gmail.com

If a concern involves one Designated Director, it should be reported to the other Designated Director or another uninvolved Board member. A report should contain the available facts and supporting documents, but the reporter should not investigate personally or confront the persons involved.

Reports will be handled as confidentially as reasonably possible. Retaliation against a person who raises a genuine concern or assists an investigation in good faith is prohibited. Knowingly making a false or malicious allegation may itself be misconduct.

22.0 INVESTIGATIONS AND COOPERATION

The Company may review or investigate suspected misconduct and may appoint suitable internal or external persons to assist. All personnel must cooperate honestly, preserve relevant information, maintain confidentiality and avoid interfering with witnesses or evidence.

The Company may refer suspected unlawful conduct to the police, Malaysian Anti-Corruption Commission or another competent authority where appropriate.

23.0 BREACHES AND CONSEQUENCES

A breach of this Code is a serious matter. Subject to the circumstances, Company procedures and applicable law, consequences may include counselling, retraining, a warning, reassignment, suspension, dismissal, recovery of losses, termination of a business relationship, civil action or referral to the authorities.

Disciplinary decisions will be made fairly and proportionately, taking account of the seriousness of the conduct, the person's responsibilities, intent, cooperation, previous conduct and other relevant circumstances.

24.0 TRAINING, ACKNOWLEDGEMENT AND REVIEW

The Company will communicate this Code to personnel at induction and periodically thereafter. Personnel may be required to attend briefings and sign an acknowledgement confirming that they have read, understood and will comply with the Code.

This Code will be reviewed at least every two years and earlier where there is a material legal, business or risk change, a significant incident or an identified control weakness.

25.0 QUESTIONS AND INTERPRETATION

Questions about this Code or a proposed action must be raised with a manager, Human Resources or a Designated Director before acting. No manager may direct or pressure anyone to breach this Code.

APPROVAL RECORD

26.0 APPROVAL AND EFFECTIVE DATE

This Code will take effect when approved by the authorised management of Sendora Group Sdn. Bhd. Once approved, it will remain in force until replaced or withdrawn in writing.

Approved by	Wong Wei Xiang (Lance)
Job title	Managing Director
Signature	***Signed original retained by the Company***
Approval date	03 January 2026
Effective date	03 January 2026