	<b>STRATUS GLOBAL HOLDINGS BERHAD</b>	DOC. NO.	SGH-007-CCE
		REV. NO.	00
	<b>CODE OF CONDUCT AND ETHICS</b>	EFF. DATE	28/11/2025
		PAGE	1 of 15

## 1.0 Purpose


- 1.1 The Board of Directors (“Board”) of Stratus Global Holdings Berhad (the “Company” or “STRATUS”) and its subsidiaries (collectively, the “Group”) has established and adopted this Code of Conduct and Ethics (“Code”) which reflects the Group’s commitment in upholding the highest standards of transparency, integrity and ethics in the conduct of its business operations.
- 1.2 This Code sets out the principles and provides guidance on the standards of behaviour in which Directors, Employees and Business Partners should conduct themselves when dealing with one another, other stakeholders of the Group and the community.
- 1.3 This Code aligns with the principles of the Malaysian Code on Corporate Governance and the corporate liability provisions under Section 17A of the Malaysian Anti-Corruption Commission Act 2009.
- 1.4 This Code is formulated with intention of achieving the following aims:
  - a) To emphasise the Group’s commitment to high standards of business ethics and compliance with the applicable laws and regulations in all jurisdictions where the Group operates;
  - b) To establish a foundation for basic standards of ethical behaviours within the Group;
  - c) To foster a corporate identity and culture that supports the thriving of ethics within the Group;
  - d) To create an environment where Employees feel confident in sharing ethical dilemmas and voicing concerns about potential misconduct; and
  - e) To prevent practices that could compromise the Group’s integrity, impartiality and reputation.
- 1.5 This Code shall read in conjunction with the Code of Ethics for Company Director and Company Secretary issued by Companies Commission of Malaysia on 11 September 2023.

## 2.0 Scope

- 2.1 This Code is applicable to all entities within STRATUS Group of Companies.
- 2.2 This Code is applicable to the following parties:
  - a) Board members including all independent or non-independent directors and alternate directors of the Group (collectively, the “Directors”);
  - b) Senior Management, managers and employees, who are employed full time, part-time, on probation, contractually or temporarily by the Group (collectively, the “Employees”) and
  - c) Suppliers, contractors, agents, consultants, outsourced personnel, distributors, advisers, government and public bodies including their advisors, representatives and officials, as well as any other person associated with or acting on behalf of the Group (collectively, the “Business Partners”).
  - d) For joint ventures and non-controlled entities, the Group shall use reasonable efforts to ensure similar ethical standards are adopted.

## 3.0 Responsibility and Compliance with the Code


- 3.1 Directors, Employees and Business Partners are responsible to familiarise themselves with this Code and act in accordance with the principles and provisions of this Code, including any updates or further amendments from time to time.

	<b>STRATUS GLOBAL HOLDINGS BERHAD</b>	DOC. NO.	SGH-007-CCE
		REV. NO.	00
	<b>CODE OF CONDUCT AND ETHICS</b>	EFF. DATE	28/11/2025
		PAGE	2 of 15

- 3.2 All new Directors, Employees and Business Partners must read and declare adherence to this Code within one (1) month from the date of their appointment by the Group via a signed copy of this Code. Existing Directors, Employees and Business Partners are required to, on annual basis, declare adherence to this Code. Human Resources Department is responsible for the completeness and compliance of the above declaration.
- 3.3 If there is a conflict between the provisions of this Code, the regulatory and legislative promulgations, and other governance policies of the Group, the stricter provisions shall apply.
- 3.4 In the event of ambiguity concerning the stipulations contained in this Code, or uncertainty as to whether a provision in this Code conflicts with the law, Directors, Employees or Business Partners should consult with their immediate manager/supervisor, Human Resources Department, Company Secretary (for Directors) or the Designated Recipient(s) provided for in the Group’s **Whistleblowing Policy and Procedures**, rather than disregarding the Code without prior consultation.
- 3.5 Directors, Employees and Business Partners are required to immediately report any concerns or violations of this Code to their immediate manager/supervisor, Chief Executive Officer (“CEO”) or Audit Committee Chairman, as the case may be. However, where any individual who feels uncomfortable in raising their concern in this manner, wish to remain anonymous or unsatisfied with the response received, the concern can be raised using the procedures provided for in the Group’s **Whistleblowing Policy and Procedures**.
- 3.6 Non-adherence to the stipulations in this Code will result in serious consequences, depending on the severity of the breach. In some cases, this could lead to the dismissal, termination of contracts and reporting to the relevant law enforcement agencies.
- 3.7 This Code is not intended to be exhaustive and does not address every possible situation. There may be additional obligations and expectations for Directors, Employees and Business Partners when performing their duties. Hence, Directors, Employees and Business Partners must always exercise sound judgement in making the right decisions.


#### 4.0 Definition

- 4.1 **“Bribery”** refers to the act of corruptly authorising, providing, agreeing to provide, promising, offering, soliciting, requesting, accepting or agreeing to accept any bribe or gratification, whether directly or indirectly, with the intention to induce or reward a person to act or refrain from acting in relation to that person’s duties, action or decision.
- 4.2 **“Corruption”** refers to the abuse of entrusted power for personal gain or to obtain an undue advantage for oneself or others and / or for the Group.
- 4.3 **“Counterparty”** means any party that the Group is currently having business relationship with or intends to do business with, either on a regular or once-off basis, which includes customers, suppliers, contractors, agents, consultants, distributors, joint venture partners and any other business partners.
- 4.4 **“Donation”** refers to voluntary contribution in the form of monetary or non-monetary gifts to a fund or cause for which no return service or payment is expected or made typically to a non-profit organisation, or charitable cause.
- 4.5 **“Entertainment”** refers to the benefit of attending conferences, concerts, sports events, recreational or leisure activities, including accommodation or travel in connection with or for the purpose of facilitating such events or activities. Entertainment may be provided with or without payment, whether in cash or in kind, and is typically offered to promote or facilitate trade, business activities and/or transactions.
- 4.6 **“Facilitation Payment”** refers to inducements or incentives provided to secure or expedite the performance of a routine action that an individual is ordinarily obliged to perform. These are usually unofficial, improper

	<b>STRATUS GLOBAL HOLDINGS BERHAD</b>	<b>DOC. NO.</b>	<b>SGH-007-CCE</b>
		<b>REV. NO.</b>	<b>00</b>
	<b>CODE OF CONDUCT AND ETHICS</b>	<b>EFF. DATE</b>	<b>28/11/2025</b>
		<b>PAGE</b>	<b>3 of 15</b>

and small sums of payments paid to speed up routine administrative processes such as licenses, permits or visas.

- 4.7 **“Family Members”** means spouse, parent, siblings, child (including adopted or stepchild), grandparents, grandchildren, in-laws, nephews, nieces, uncles or aunts.
- 4.8 **“Fraud”** means a false representation of a matter of fact, whether by words or by conduct, by false or misleading allegation, or by concealment of what should have been disclosed, that deceive or is intended to deceive another person.
- 4.9 **“Gift”** refers to any form of monetary or non-monetary benefits such as goods, services, cash or cash equivalents, club membership, rewards, facilities, hampers, jewellery and decorative items provided to or accepted by Directors, Employees and Business Partners, or their family members on his or her behalf.
- 4.10 **“Harassment”** means any direct or indirect action, conduct or behaviour which any individual or group of individuals finds abusive, humiliating, intimidating or hostile, whether verbal, physical or visual.
- 4.11 **“Hospitality”** refers to friendly and generous provision or acceptance of care to or from Business Partners. Business lunches or dinners are accepted modes of hospitality. The provision or acceptance of hospitality should be infrequent and non-lavish. The sole purpose must be for the enhancement of a business relationship and not for reciprocity.
- 4.12 **“Intellectual Property”** refers to proprietary business or technical information of value protected by patent, trademark, copyright, or trade secret laws.
- 4.13 **“Kickbacks”** refers to any form of payment intended as compensation for favourable treatment or other improper services. This includes the return of a sum already paid or due as a reward for awarding of furthering business.
- 4.14 **“Money laundering”** refers the process of concealing the identity of money or properties obtained from criminal activities by passing it through legitimate business channels.
- 4.15 **“Proliferation Financing”** refers to to the act of raising, moving, or making available funds, assets or other economic resources, or financing, in whole or in part, to persons or entities for purposes of weapons of mass destruction proliferation, including the proliferation of their means of delivery or related materials (including both dual-use technologies and dual-use goods for non-legitimate purposes).
- 4.16 **“Proprietary Information”** refers to information held by a person or entity concerning the know-how, trade secrets or other information of any kind, whether in printed or electronic format, including but not limited to Intellectual Property rights, technical information, business processes, sales forecasts, marketing strategies, customer lists or potential customer information, financial records or operations which is regarded as being confidential in nature (whether or not labelled as confidential) that belongs to and owned by the Group.
- 4.17 **“Public Official”** refers to:
- a) Any person holding a legislative, administrative or judicial office of a country, government, state, province or municipality, whether appointed or elected;
  - b) Any person exercising a public function for a country, government, state, province or municipality, including for a government agency, board, commission, corporation, or other body or authority;
  - c) Any official or agent of a public international organisation; or
  - d) Any political party or official of a political party or a candidate for public office.
- 4.18 **“Sponsorship”** refers to provision of monetary or non-monetary support to a third party or an external organisation primarily in exchange for advertising, marketing and promotional opportunities (e.g. to an event, a sports team, a charity organisation, etc.).

	<b>STRATUS GLOBAL HOLDINGS BERHAD</b>	DOC. NO.	SGH-007-CCE
		REV. NO.	00
	<b>CODE OF CONDUCT AND ETHICS</b>	EFF. DATE	28/11/2025
		PAGE	4 of 15

4.19 **“Terrorism Financing”** refers to carrying out transactions involving funds or property, whether from a legitimate or illegitimate source, that may or may not be owned by terrorists, or those have been, or are intended to be used to assist the commission of terrorist acts, and/or the financing of terrorists and terrorist organisations.

4.20 **“Travel”** refers to any form of transportation provided for a legitimate business trip, including incidental benefits such as meals, accommodation, airport transfers, taxi and ride-hailing fees.

## 5.0 Workplace Culture and Environment

### 5.1 General Conduct

5.1.1 Directors, Employees and Business Partners shall exercise due care and diligence in discharging their duties to the best interest of the Group and conduct themselves in a professional manner with uncompromising integrity and utmost confidentiality.

### 5.2 Equal Opportunity and Non-Discrimination

5.2.1 The Group strives to provide equal opportunities to all and endeavours to ensure that employment-related decisions are made based on relevant qualifications, skill, knowledge, merit, performance and other job-related factors and in compliance with all applicable laws and regulations.

5.2.2 Directors, Employees and Business Partners shall treat each other with respect and value each other’s differences and diverse perspectives. Directors, Employees and Business Partners shall be responsible to create a conducive working environment that is non-discriminatory towards race, religion, gender, age, social status, disability, sexual orientation or nationality.

### 5.3 Harassment and Violence


5.3.1 The Group strictly prohibits its Directors, Employees and Business Partners from engaging in any form of harassment and violence. These actions or behaviours are typically made based on age, race, gender, disability, nationality, religion, or sexual orientation include, but not limited to:

- a) Derogatory comments on any material of works or forms of communication channels such as racial slurs, sexual jokes, pornographic materials, posting offensive statements, distribution of inappropriate jokes; and
- b) Sexual harassment includes behaviour such as solicitation of sexual favours, unwelcomed sexual advances or other verbal, visual or physical conducts of a sexual nature.

### 5.4 Workplace Health and Safety

5.4.1 The Group strives to provide a safe, secure and healthy working environment. Directors, Employees and Business Partners are responsible for creating and maintaining a safe and healthy workplace by:

- a) Complying with occupational safety and health regulations of all countries in which the Group operates, as well as the Group’s environmental, safety and health policies and procedures;
- b) Using all protective equipment or devices provided;
- c) Ensure all plants and machineries are well maintained and in safe working condition; and

	<b>STRATUS GLOBAL HOLDINGS BERHAD</b>	DOC. NO.	SGH-007-CCE
		REV. NO.	00
	<b>CODE OF CONDUCT AND ETHICS</b>	EFF. DATE	28/11/2025
		PAGE	5 of 15

d) Reporting immediately accidents, injuries and unsafe equipment, practices or conditions to the appropriate department.

5.4.2 Reckless or violent behaviour that endangers the safety of others will not be tolerated and may result in disciplinary action, including termination.

5.4.3 The onus is on the Directors, Employees and Business Partners to immediately declare any dangerous and contagious disease, that he/she is afflicted with to their immediate manager/supervisor, or any designated person appointed by the Group.

## 5.5 Human Rights

5.5.1 Directors, Employees and Business Partners shall respect, support and uphold the fundamental dignity of every human being and their rights.

5.5.2 The Group strictly prohibits the use of forced labour, child labour, slavery, human trafficking and sexual exploitation in its business conduct. The Group also expects all Business Partners to uphold this principle and adhere to similar commitments within their own business practices.

## 5.6 Alcohol and Illegal Drugs

5.6.1 The Group strictly prohibits the consumption, possession, purchase or sale of alcohol, illegal drugs or other prohibited substances in the Group's premises.

5.6.2 Directors, Employees and Business Partners shall not be under the influence of alcohol, illegal drugs or other prohibited substances when reporting for work in the Group's premises or during the course of work, which could negatively impact sound decision making process.


## 5.7 Abuse of Power

5.7.1 The Group does not tolerate any form of abuse of power in the workplace that may result in undermining morale, endangering the job or performance of Employees, or in any way interferes with or influences the performance or career of Employees.

5.7.2 Directors, Employees and Business Partners are expected to possess high accountability and responsibility in performing their duties, without abusing power and position for personal gain or for the benefit of other interested parties.

5.7.3 Abuse of power may occur both internally among Employees and externally with stakeholders. There are many forms of abuse of power. Examples include:

- a) Allocating the Group's resources for personal gain;
- b) Using the Group's letterhead to draw inappropriate personal request;
- c) Giving discount without due diligence and proper authorisation;
- d) Bullying or harassing behaviours;
- e) Withholding information that could be vital in the success of an assignment or project;
- f) Setting unrealistic goals causing extra stress to the subordinates;
- g) Requesting subordinates to perform personal favours or errands; or

	<b>STRATUS GLOBAL HOLDINGS BERHAD</b>	DOC. NO.	SGH-007-CCE
		REV. NO.	00
	<b>CODE OF CONDUCT AND ETHICS</b>	EFF. DATE	28/11/2025
		PAGE	6 of 15

h) Pressuring subordinates to distort facts or break rules.

## 5.8 Personal Data Protection

- 5.8.1 The Group respects the privacy and confidentiality of personal data provided by its stakeholders and ensures that such data is kept private and protected, except when access is granted to authorised personnel for legitimate business purposes.
- 5.8.2 Any person with access to such data shall comply with the applicable laws, such as Personal Data Protection Act, and the Group's policies. Appropriate measures must be taken when dealing with personal data in terms of collection, processing, disclosure, security, storage and retention.


## 6.0 Conducting Business with Integrity

### 6.1 Complying with Laws

- 6.1.1 The Group is committed to complying with applicable laws and regulations in all jurisdictions where it operates. Failure to adhere to these laws may subject its Directors, Employees and Business Partners to prosecution, legal penalties, fines and imprisonments. This may also result in reputational damage to the Group, impact on operations, loss of trust and loss of business.
- 6.1.2 It is the responsibility of Directors, Employees and Business Partners to familiarise themselves with the laws, by-laws, ordinances, rules, regulations, directives, license/permit conditions, codes, standards and terms and conditions of agreements and contracts applicable to their business function and roles.
- 6.1.3 Directors, Employees and Business Partners must not engage in or become involved in any behaviour or activities that may be categorised as subversive, or commit any wrongdoing, criminal or otherwise, that is punishable under the laws of any country. If found guilty by a court of law or found to be involved in subversive activities or commit a criminal offence, the concerned Director, Employee or Business Partner will be dealt with in accordance with the Group's policies and procedures.
- 6.1.4 The Group reserves the right to report any actions or activities suspected of being criminal in nature to the police or other relevant authorities.

### 6.2 Anti-Bribery and Anti-Corruption

- 6.2.1 The Group adopts a strict policy towards all forms of bribery and corruption, including but not limited to acts of extortion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.
- 6.2.2 The Group is committed to:
- Upholding the highest standards of transparency, integrity and ethics in all business dealings and across all jurisdictions where the Group operates;
  - Never offering bribes, whether directly or indirectly, to gain a business advantage;
  - Never accepting bribes, whether directly or indirectly, to gain business advantage;
  - Implementing and enforcing an effective system to counter bribery and corruption; and
  - Providing full and consistent support to zero-corruption programs.
- 6.2.3 The Group is dedicated to upholding its anti-bribery and anti-corruption principles and expects the same commitment from all its internal and external stakeholders.

	<b>STRATUS GLOBAL HOLDINGS BERHAD</b>	DOC. NO.	SGH-007-CCE
		REV. NO.	00
	<b>CODE OF CONDUCT AND ETHICS</b>	EFF. DATE	28/11/2025
		PAGE	7 of 15

6.2.4 The Group strives to build transparent and fair relationship with Public Officials. Caution must be exercised when dealing with Public Officials.

6.2.5 Directors, Employees and Business Partners are prohibited from, directly or indirectly, provide or accept facilitation payments (commonly known as “grease payment”) or kickbacks to any local or foreign Public Officials with the intent to gain any form of advantage. Directors, Employees and Business Partners must avoid any activity that might lead to the provision or acceptance of facilitation payments or kickbacks.

*Refer to the Group’s **Anti-Bribery and Anti-Corruption Policy** for detailed guidelines and requirements on managing bribery and corrupt practices that may arise in day-to-day business operations.*

### 6.3 Gifts, Entertainment, Hospitality and Travel

6.3.1 The Group strictly prohibits its Directors, Employees and Business Partners from providing or accepting gifts (in cash or in kind), entertainment, hospitality, or travel to/from third parties and stakeholders on the Group, which may be viewed as a bribe or with the intention to:

- a) Secure or award an improper business advantage;
- b) Facilitate, expedite, or reward any action or procedure;
- c) Solicit business and favours; or
- d) Influence business decisions.

6.3.2 Directors, Employees and Business Partners shall not provide, agree to provide, promise, offer, solicit, request, accept or agree to accept, whether directly or indirectly, any gifts, entertainment, hospitality or travel that will give rise to a conflict of interest situation or create the appearance of conflict of interest, which may adversely affect the Group’s reputation.

6.3.3 Gifts, entertainment, hospitality and travel may only be provided or accepted in very limited and specific circumstances. In principle, it must be appropriate and reasonable in value, infrequent in nature, bona fide, given in transparent and open manner, and given in appropriate timing and circumstances, and permitted by relevant laws and policies.

6.3.4 Even in the exceptional circumstances, proper care and judgement and must be exercised.

6.3.5 The prohibition on providing and accepting gifts, entertainment, hospitality and travel extends to family members and any persons connected to the Directors, Employees or Business Partners.


*Directors, Employees and Business Partners who intent to provide or accept any gift, entertainment, hospitality or travel must comply with the Group’s **Gift, Entertainment, Hospitality and Travel Policy**.*

### 6.4 Corporate Social Responsibility, Donation and Sponsorship

6.4.1 The Group prohibits using Corporate Social Responsibility (“CSR”), donations and sponsorships to influence business decisions or gain any business advantage.

6.4.2 In principle, CSR, donations and sponsorships may only be offered when it is permissible under applicable laws and regulations, compatible with the Group’s values, legitimate in nature, made in an open and transparent manner, and reasonable in value and frequency.

6.4.3 The Group shall avoid situations that could create actual or perceived conflicts of interests. Additional care must be taken when making contributions to charities or sponsored organisations that may have

	<b>STRATUS GLOBAL HOLDINGS BERHAD</b>	DOC. NO.	SGH-007-CCE
		REV. NO.	00
	<b>CODE OF CONDUCT AND ETHICS</b>	EFF. DATE	28/11/2025
		PAGE	8 of 15

links to Public Officials or their family members, as this could be seen as an attempt to influence the decision of Public Officials in gaining benefit to the Group

6.4.4 Due diligence must be performed on the recipients to avoid contributions to:

- a) Political party or any organisation related to politics;
- b) Organisation which may be engaged in terrorism, money laundering or criminal activities;
- c) Organisation that is declared bankrupt or blacklisted by any financial institutions;
- d) Organisation which may be involved in fraud, embezzlement or scam; and
- e) Organisation related to gambling, alcohol and tobacco.

*Directors, Employees and Business Partners who intent to provide any CSR, donations or sponsorships must comply with the Group's **CSR, Donation and Sponsorship Policy**.*

## 6.5 Conflict of Interest

6.5.1 Directors and Employees are expected to make business decisions in the best interest of the Group. In the event of a conflict between the Group's interest and the Director or Employee's own personal interest, he/she must always make decisions with the Group's interest as the top priority.

6.5.2 Directors and Employees shall avoid placing themselves in a position of actual, potential or perceived conflict of interests, which might affect their judgement or impartiality when performing their duties. Where this is unavoidable, the conflicted Director or Employee shall make the relevant declaration regarding the conflict before any contract is entered into or any transaction is carried out.

6.5.3 Directors and Employees must protect the Group's confidential business information, resources and assets, and shall never use it for the benefit of themselves, their family members or others.

6.5.4 Directors and Employees must not make use of their position in the Group to influence business decisions for personal gains or for the advantage of their family member or business associates.

6.5.5 The declaration of conflict of interest is mandatory for all Directors and Employees, and shall be made at the following points in time:


- a) Initial Declaration: Within one (1) month of joining the Group;
- b) Annual Declaration: Annually, regardless of whether a conflict exists; and
- c) Ongoing Declaration: As soon as practicable., if a conflict arises and was not included in the annual declaration.

*Refer to the Group's **Conflict of Interest Policy** for detailed procedures on identifying, managing and preventing any actual, potential or perceived conflict of interests.*

## 6.6 Anti-Money Laundering, Counter Financing of Terrorism and Counter Proliferation Financing ("AML/CFT/CPF")

6.6.1 The Group strongly objects to all practices related to money laundering, terrorism financing and proliferation financing. Directors and Employees must adhere to and understand the Group's AML/CFT/CPF measures to prevent the risks of the Group's businesses from being used as a conduit for these activities.

6.6.2 Directors and Employees are strictly prohibited from involvement in money laundering, terrorism financing and proliferation financing, including but not limited to the following:


	<b>STRATUS GLOBAL HOLDINGS BERHAD</b>	DOC. NO.	SGH-007-CCE
		REV. NO.	00
	<b>CODE OF CONDUCT AND ETHICS</b>	EFF. DATE	28/11/2025
		PAGE	9 of 15

- a) Structuring transactions to evade reporting requirement;
  - b) Requests for payment amounts that differ from the milestones stated in the contract;
  - c) Payment made in currencies that differs from that stated in the contract;
  - d) Mode of payment used is outside the course of normal business practice; and
  - e) Payments to or from parties that are not the contracting parties.
- 6.6.3 Reasonable degree of due diligence must be conducted to understand the business and background of any prospective Counterparty, including their identity, legal existence, beneficial owners, and the origin and destination of funds, property and services.

*Refer to the Group's **Anti-Money Laundering Policy** for detailed procedures on identifying the "red flags" and reporting suspicious transaction.*

## 6.7 Insider Trading

- 6.7.1 Directors and Employees must comply with the applicable laws and regulations on insider trading, including restriction in dealing with the Group's publicly traded securities while in possession of material non-public or price sensitive information, until such information is made available to the public.
- 6.7.2 Such undisclosed price-sensitive information is classified as confidential insider information. This includes information such as:
- a) Financial and operating results;
  - b) Potential mergers or acquisitions;
  - c) Divestments or financing plans;
  - d) Changes in the Group's Directors, Senior Management or auditors;
  - e) New products or projects; or
  - f) Any other information which is likely to have a significant impact on the Group's financial results or securities price.
- 6.7.3 Directors and Employees must always safeguard confidential and price-sensitive information of the Group and are prohibited from disclosing it to anyone, including their family members and friends, and shall never use it to trade in the Group's securities or recommend or cause a third party to do so, as prohibited by Section 188(3) of the Capital Markets and Services Act 2007. Unless authorised, Directors and Employees shall only disclose such information by any order of any court or competent jurisdiction or any competent judicial, governmental or regulatory authority.
- 6.7.4 Breach of insider trading laws and regulations can result in severe criminal penalties, as outlined in Section 188(4) of Capital Markets and Services Act 2007, as well as civil actions by the affected parties.
- 6.7.5 In accordance with Section 188(2) of the Capital Markets and Services Act 2007, Directors and Employees, including their family members, are prohibited from trading in the securities of any listed or soon-to-be listed entity on a stock exchange while he/she is in possession of non-public information, obtained through their directorship or employment, or connection with the Group, which, if made public, could materially affect the market price of the securities of the entity concerned.
- 6.7.6 Respective Head of Department shall update to Company Secretary and Finance Director (or their equivalent designated personnel) on the nature of transactions as well as names and designations of persons who are privy to price-sensitive information within the same day. The said list shall be

	<b>STRATUS GLOBAL HOLDINGS BERHAD</b>	<b>DOC. NO.</b>	<b>SGH-007-CCE</b>
		<b>REV. NO.</b>	<b>00</b>
	<b>CODE OF CONDUCT AND ETHICS</b>	<b>EFF. DATE</b>	<b>28/11/2025</b>
		<b>PAGE</b>	<b>10 of 15</b>

maintained by Company Secretary and Finance Director (or their equivalent designated personnel) from time to time.


- 6.7.7 In the event that Directors or Employees are uncertain of any related information to insider trading held by them, they shall seek further clarification or advice from Company Secretary or Finance Director (or their equivalent designated personnel).
- 6.7.8 Directors and Employees must adhere to applicable securities laws and regulations and avoid breaches, which include false trading, market rigging, market manipulation, fraudulent and misleading trading, electronic crime and dissemination of false information.

#### 6.8 Accuracy of Financial Information

- 6.8.1 The Group is committed to maintaining the integrity of financial information for the benefit of its stakeholders, including but not limited to the Board, Senior Management, shareholders, creditors and government agencies.
- 6.8.2 Directors and Employees must ensure that all business records and documents are prepared accurately, reliably and in a timely manner, conforming to generally accepted accounting principles and all applicable laws and regulations in the jurisdiction where the Group operates.
- 6.8.3 Accurate records are important to the Group's decision making processes and the proper discharge of its financial, legal and reporting obligations. Falsifying financial or any other records, or misrepresentation of information, may constitute fraud, leading to civil and criminal liabilities for Directors, Employees and the Group.
- 6.8.4 Directors and Employees are obligated to report false entries or omissions and to highlight questionable or improper accounting in the books and records of the Group.

#### 6.9 Competition and Fair Dealing

- 6.9.1 The Group is committed to driving business growth and success through upholding the highest standards of ethical business conduct, in strict compliance with anti-trust and fair competition laws in all countries where the Group operates.
- 6.9.2 Directors and Employees shall respect the rights and deal fairly with customers, suppliers and competitors of the Group.
- 6.9.3 Directors and Employees shall not engage in unfair practices, including but not limited to manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other practices prohibited by relevant laws and regulations. Such prohibited practices include, but are not limited to:
  - a) Rigging a competitive bidding process, including arrangements to submit sham bids;
  - b) Misappropriating proprietary information obtained without owners' consent or by inducing disclosures from directors or employees of other companies; and
  - c) Adopting strategies to illegally exclude competitors from the market, such as, without limitation anti-competitive bundling or predatory pricing.

	<b>STRATUS GLOBAL HOLDINGS BERHAD</b>	<b>DOC. NO.</b>	<b>SGH-007-CCE</b>
		<b>REV. NO.</b>	<b>00</b>
	<b>CODE OF CONDUCT AND ETHICS</b>	<b>EFF. DATE</b>	<b>28/11/2025</b>
		<b>PAGE</b>	<b>11 of 15</b>

#### 6.10 Product Quality and Safety

- 6.10.1 The Group is committed to only offer quality and safe products and services that meet customers' needs and expectations. The Group encourages proactive approach in identifying and addressing any potential issues regarding its product quality safety, ensuring that the highest standards are maintained at all times.
- 6.10.2 Directors, Employees and Business Partners must always treat customers with honesty and respect by providing accurate and truthful information about the Group's products and services. Directors, Employees and Business Partners must also endeavour to enhance the quality and reliability of products and services through continuous process improvement and innovation.
- 6.10.3 The Group strictly prohibits deliberate misleading messages, omission of important facts, or false claims about its offerings or those of its competitors. Such practices undermine trust and are against the Group's commitment to integrity and transparency.


### 7.0 Protection of Group's Assets and Information

#### 7.1 Intellectual Property

- 7.1.1 Any inventions, patents or trademarks including new processes, technical know-hows, products or systems produced by any Employee as a result of the work performed for or on behalf of the Group in the course of employment, shall remain as the property of the Group.
- 7.1.2 Directors and Employees shall not have any possession of any of the Group's Intellectual Property in any form upon termination of his / her working relationship with the Group.

#### 7.2 Protection and Proper Use of Assets

- 7.2.1 Directors and Employees shall ensure the safe keeping and protection of the Group's assets, both tangible and intangible from wastage, loss, vandalism or damage, misuse, theft, misappropriation or infringement of Intellectual Property rights and ensure these assets are used responsibly. Any suspected incident of fraud or theft shall be immediately reported for investigation.
- 7.2.2 The Group's equipment or vehicles shall not be used outside the ordinary course of business. However, incidental personal use may be permitted with prior approval of the authorised personnel of the Group. In considering whether the approval shall be granted by the authorised personnel, the following factors shall be considered:
- The activities do not impair Director or Employee's ability to perform his / her duties and functions with the Group;
  - The activities do not occur during office hours while Director or Employee is required to perform official duties;
  - There would be not an arising conflict of interest from the activity or position held including the perception or appearance of conflict; and
  - Any other factors deemed appropriate by the Group from time to time.
- 7.2.3 Directors and Employees shall also ensure that all expenditures are transacted in a transparent manner and properly documented for all expenditures or when making commitment on the use of the Group's funds.

	<b>STRATUS GLOBAL HOLDINGS BERHAD</b>	DOC. NO.	SGH-007-CCE
		REV. NO.	00
	<b>CODE OF CONDUCT AND ETHICS</b>	EFF. DATE	28/11/2025
		PAGE	12 of 15

7.2.4 Directors and Employees shall be responsible for all the assets of Business Partners that are entrusted under their care and must treat these assets with the same level of diligence and care as with other physical properties belonging to the Group.

### 7.3 Confidentiality and Privacy of Information

7.3.1 The Group is committed to protecting all confidential and proprietary information. Directors and Employees must exercise caution and safeguard such information entrusted to them, unless required by law or regulation to disclose it. Without prior written authorisation from the Group, Directors and Employees who have access to such information is not permitted to use or share that information for any other purpose except in the conduct of the Group's business.

7.3.2 Directors and Employees shall not use, or attempt to use, or disseminate the Group's confidential and proprietary information in any manner as it may cause significant economic loss for the Group, damaging relationship with customers and breach of trust.

7.3.3 Directors and Employees must avoid unintentional disclosure by adopting safe practices when transmitting or storing the Group's confidential and proprietary information. Such information should only be disclosed to those within the Group on a need-to-know basis and in accordance with applicable laws, regulations, and Group policies.

7.3.4 Examples of such information include, but are not limited to:

- a) Financial records (internal databases, agreements, contracts, statements);
- b) Business plans (strategies, patent applications);
- c) Sales and marketing data (new products, market analysis, product plans);
- d) Employee records (personal and salary data, medical records, performance review); and
- e) Technical information (design/drawings, product specification, engineering/manufacturing know-how, software).

7.3.5 If a family member of a Director or Employee is a competitor or supplier of the Group or is employed by one, the Director or Employee must exercise extra caution in his / her communication to ensure the security and confidentiality of information to avoid conflicts of interest.


7.3.6 Directors and Employees must take all reasonable steps to promptly repatriate all confidential information and documents in their possession to the Group, upon ending their service with the Group.

7.3.7 The obligation for Directors and Employees to preserve the confidentiality of proprietary information shall continue to apply after termination of appointment or employment, unless such information has become public or when disclosure is authorised by the Group, or required by any order of any court of competent jurisdiction or any competent judicial, governmental or regulatory authority.

### 7.4 Records Management

7.4.1 The Group requires complete, accurate and timely recording and reporting of information in order to make informed business decisions.

7.4.2 The Group's records shall be managed securely in line with their importance and in compliance with legal, tax, accounting and regulatory laws in the country where the Group operates. Employees must

	<b>STRATUS GLOBAL HOLDINGS BERHAD</b>	<b>DOC. NO.</b>	<b>SGH-007-CCE</b>
		<b>REV. NO.</b>	<b>00</b>
	<b>CODE OF CONDUCT AND ETHICS</b>	<b>EFF. DATE</b>	<b>28/11/2025</b>
		<b>PAGE</b>	<b>13 of 15</b>

record and maintain all corporate information and financial data in reasonable detail, ensure they are accurate, up-to-date, legible and readily retrievable.

7.4.3 Directors and Employees shall not falsify, remove, damage, destroy or duplicate any classified information belonging to the Group. Classified information includes, but is not limited to, proprietary business data, sensitive financial records, and strategic plans.

7.4.4 The Group's records shall always be retained or destroyed according to the Group's established record retention policies and in compliance with relevant laws and regulations. Failure to adhere to these policies may result in disciplinary action, including legal consequences.

#### 7.5 Giving Reference

7.5.1 Directors and Employees may only give reference in their personal capacity and is not permitted to use the Group's name, letterhead, logo or trademark. Only Company Secretary (for Directors), Human Resources Department and authorised personnel can issue testimonials in a standardised format pertaining to any Director's or Employee's appointment or employment history.

#### 7.6 Public Statement

7.6.1 The phrase 'public statement' includes the any statement or comment made to any media, the internet and speaking engagements. This also applies to all forms of correspondences with the media in print, electronic form, or through social media channels.

7.6.2 Unless authorised by the Chairman of the Board or CEO, Directors and Employees shall not make any public statements to any person, organisation or institution nor shall he/she circulate any such statements made by him/her or by anyone else that could affect the Group's reputation.


7.6.3 Directors and Employees shall not discuss, explain, issue, make or distribute any public statement either orally or in writing, without prior approval from the Group. This includes matters related to:

- a) The Group's policies, decisions, trade secrets or results;
- b) Departmental matters in which the Employee is currently working or has previously worked;
- c) Any action taken by the Group in relation to official matters involving the concerned Director and Employee; and
- d) Any other confidential matters or insider information related to the Group, which the Director and Employee might come in contact during their course of service with the Group.

7.6.4 If approached by any member of the media for any information, statement, opinion, comments or news about the Group, it is the duty of the Employee to inform and refer the matter to their immediate manager/supervisor. The immediate manager/supervisor shall escalate the issue to CEO for further action and issue an appropriate response accordingly.

7.6.5 When using private social media accounts, Directors and Employees must ensure that any posts reflect only personal opinions and shall refrain from commenting or posting any information related to Group's policies, activities, people or operations which could create a negative perception of the Group.

7.6.6 Any information released to the press or media must be issued by the authorised spokespersons of the Group.

	<b>STRATUS GLOBAL HOLDINGS BERHAD</b>	<b>DOC. NO.</b>	<b>SGH-007-CCE</b>
		<b>REV. NO.</b>	<b>00</b>
	<b>CODE OF CONDUCT AND ETHICS</b>	<b>EFF. DATE</b>	<b>28/11/2025</b>
		<b>PAGE</b>	<b>14 of 15</b>

## 7.7 Public Appearance

- 7.7.1 A Director or Employee who has been invited to appear as a guest speaker at any public or private events/forum must submit the details and topic(s) of the proposed speech to the Chairman of the Board or CEO for consideration. Prior approval must be obtained before making such an appearance.
- 7.7.2 Directors and Employees, whether speaking in their personal capacity or as the representatives of the Group, must ensure that their thoughts, words and actions do not tarnish or portray the Group's image and interests in an unfavourable light.


## 8.0 Anonymous Complaint and Whistleblower Protection

### 8.1 Reporting of violations and suspected violations

- 8.1.1 The Group practices an open door policy and encourages all Directors and Employees to report, verbally or in writing, promptly and in confidence, any evidence of any improper practice or unethical behaviour or if they are in doubt about the best course of action in a particular situation.
- 8.1.2 Failure by any parties within the Group to report a known violation of the Code is a violation on itself. Any party who wants to report any violations or suspected violations of the Code can report such violation to the Human Resources Department or via the whistleblowing channels as outlined in the Group's **Whistleblowing Policy and Procedures**.
- 8.1.3 Procedures for reporting violations and suspected violations are outlined in the Group's **Whistleblowing Policy and Procedures** that is made available on the Group's website.
- 8.1.4 The Group takes all reports and incidents of possible violations to the Code seriously and shall investigate them thoroughly in accordance with the relevant investigation procedures. Appropriate disciplinary actions shall be taken where violations have been proven.
- 8.1.5 The Group expects all parties to act in good faith and have reasonable grounds when reporting a concern or issue. If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including legal action, where applicable.

### 8.2 No Retaliation

- 8.2.1 The Group does not tolerate retaliation against individual who discloses any actual or suspected violations in good faith.
- 8.2.2 There will be no harassment, retaliation or adverse employment consequence against Directors, Employees and any other parties for reporting a suspected violation in good faith or participating in an investigation of a suspected violation. Directors, Employees and any other parties involved are expected to cooperate during the internal investigations of the alleged misconduct.
- 8.2.3 All reports made on a possible violation shall be treated in a confidential manner, with disclosure limited to conduct a full investigation of the alleged violation. Disclosure of reports to individuals who are not involved in the investigation will be viewed as a serious disciplinary offence which may result in disciplinary action, up to and including termination of employment or dismissal.
- 8.2.4 A Director or an Employee who retaliates against others (including Counterparties and Business Partners) who make a report in good faith will be subject to disciplinary action up to and including termination of employment or dismissal.

	<b>STRATUS GLOBAL HOLDINGS BERHAD</b>	<b>DOC. NO.</b>	<b>SGH-007-CCE</b>
		<b>REV. NO.</b>	<b>00</b>
	<b>CODE OF CONDUCT AND ETHICS</b>	<b>EFF. DATE</b>	<b>28/11/2025</b>
		<b>PAGE</b>	<b>15 of 15</b>

### 8.3 Employees' Rights to a Fair Hearing

8.3.1 No Employee shall be found guilty of any misconduct without first being provided with a show-cause notice detailing the allegations and/or complaint against them. The Employee shall be given a fair opportunity to explain or defend themselves in response to these allegations.

### 9.0 Dissemination of the Code

9.1 Directors and Employees shall be made aware of the Code and its content upon the commencement of their service or employment with the Group, and this shall form part of the onboarding programme.

9.2 The Group's Code shall be made available to all persons as well as access to the online version of the Code which shall include regular updates and refreshers to reflect any changes.

### 10.0 Review of the Code

10.1 This Code will be reviewed periodically and updated in accordance with the needs of the Group and any new legislative promulgations that may have an impact in discharging the Board's responsibilities.

10.2 Any revision or amendment to this Code, as proposed by the Directors or any third party, shall first be presented to the Board for its approval. Upon the Board's approval, the said revision or amendment shall form part of this Code.

10.3 The duly revised or amended Code shall be disclosed on the Group's website.

