

**VASTIQ SOLUTIONS SDN BHD**

*A Digital Integrator Company*

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**CODE OF ETHICS AND  
BUSINESS CONDUCT**

Standards of Integrity for All Employees

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Document Reference: VASTIQ-COE-01

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## Document Control

<b>Document Title</b>	Code of Ethics and Business Conduct
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<b>Owner</b>	Human Resources / Management
<b>Approved By</b>	Managing Director (on behalf of the Board of Directors)
<b>Next Review</b>	Annually, or upon material change

## 1. Policy

It is the policy of VASTIQ Solutions Sdn Bhd (“VASTIQ” or “the Company”) to maintain this Code of Ethics and Business Conduct (“the Code”) as a guide to proper business conduct for all employees and those who act on the Company’s behalf. We expect everyone to observe the highest standards of ethics and integrity, founded on the principles set out below.

### 1.1 Build Trust and Credibility

Our success depends on the trust and confidence we earn from our employees, clients, partners and stakeholders. We build that credibility by honouring our commitments, acting honestly and with integrity, and pursuing the Company’s goals only through legitimate and honourable conduct. Before taking any action, it is wise to ask whether it builds trust in VASTIQ, whether it helps create an environment in which the Company can succeed over the long term, and whether any commitment made is one that can genuinely be kept.

### 1.2 Respect for the Individual

Everyone deserves to work in an environment where they are treated with dignity and respect. VASTIQ is committed to providing a workplace that is free from discrimination and from abusive, offensive or harassing behaviour, and to offering fair and equal opportunity. Any employee who feels harassed or discriminated against should report the matter to their manager or to Human Resources.

### 1.3 Open and Honest Communication

Everyone at VASTIQ should feel able to speak their mind, particularly on matters of ethics. Managers have a responsibility to create an open and supportive environment in which people feel comfortable raising questions and concerns. The Company will look into all reports of questionable or unethical behaviour and will take appropriate action where wrongdoing is found. VASTIQ will not tolerate retaliation against anyone who raises an ethics concern in good faith.

### 1.4 Uphold the Law

Our commitment to integrity begins with complying with the laws, rules and regulations that apply wherever we do business. Each of us must understand the Company policies and legal requirements relevant to our role. If you are unsure whether a contemplated action is permitted, seek advice before acting. We are each responsible for preventing breaches of the law and for speaking up about possible violations.

## 1.5 Fair Competition

We are committed to ethical, fair and vigorous competition. We win business on the merits – through quality, capability, service and competitive pricing – and we make independent pricing and marketing decisions. We do not improperly coordinate our activities with competitors, and we do not offer or solicit improper payments in connection with the purchase or sale of goods or services.

## 1.6 Proprietary Information and Intellectual Property

We respect the property rights of others. We do not seek to obtain a competitor's trade secrets or confidential information by improper means, and we do not make unauthorised use, copies, distribution or alteration of software or other intellectual property. We protect the confidential and proprietary information entrusted to us by the Company, clients and partners.

## 1.7 Avoid Conflicts of Interest

We must avoid any relationship or activity that might impair, or appear to impair, our ability to make objective and fair decisions in our work. We must never use Company property, information or position for personal gain, or take for ourselves an opportunity discovered through our role at VASTIQ. Where a conflict of interest may exist, it must be disclosed and reviewed with management or Human Resources before proceeding.

## 1.8 Gifts, Hospitality and Business Courtesies

Business courtesies must never be used to gain or grant an unfair advantage. Employees must not solicit gifts or hospitality, and should decline any courtesy that could create the appearance of influencing a business decision – particularly from a supplier or client when a contract is being awarded or renewed. Any modest, occasional gift or hospitality that is accepted or offered must comply with the Company's Anti-Bribery & Corruption Policy, be properly recorded, and be of a kind the employee would be comfortable disclosing to management and the public.

## 1.9 Accurate Records and Reporting

We create, maintain and dispose of Company records honestly and in accordance with Company policy and legal requirements. All records and data must be true, accurate and complete, and no business objective ever justifies misrepresenting facts or falsifying records. We do not improperly influence, mislead or obstruct any audit. Disclosures in financial and business reports must be full, fair, accurate, timely and understandable.

## 1.10 Protection and Proper Use of Company Resources

Company resources – including time, equipment, materials, information and systems – are provided for legitimate business use. Reasonable, occasional personal use is acceptable provided it does not affect job performance or disrupt the workplace. Company resources must not be used to create, store or transmit material that is harassing, threatening, abusive, indecent or otherwise inappropriate. To protect the Company's systems and people, VASTIQ reserves the right to monitor and review the use of Company-issued devices, networks and accounts, subject to applicable law.

## 1.11 Confidentiality and Data Protection

Protecting confidential information is integral to our success. This includes commercial, technical, pricing and financial data, as well as personal data and non-public information entrusted to us by employees, clients and partners. We do not disclose such information without a valid business or legal purpose and proper authorisation, and we handle personal data in accordance with applicable data-protection laws.

### **1.12 Health, Safety and the Environment**

We are committed to a safe and healthy workplace and to working responsibly at every site. Everyone must follow applicable health, safety and environmental requirements and report unsafe conditions or practices promptly.

## **2. Accountability**

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Each of us is responsible for knowing and following the values and standards set out in this Code, and for raising questions when we are uncertain. If you are concerned that the standards are not being met, or you become aware of a possible breach, you must raise it with your manager, Human Resources or through the Company's Whistleblowing channel. The Company takes these standards seriously, and breaches may result in disciplinary action up to and including termination of employment, as well as referral to the authorities where appropriate.

## **3. Compliance and Administration**

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Compliance with this Code is essential to our continued success. Human Resources is responsible for communicating the Code and ensuring it is understood and observed, while day-to-day responsibility for implementation rests with all members of management. Compliance is subject to review by management and the Board. Employees are expected to bring any breach or suspected breach to management's attention, and a confidential reporting channel is available for this purpose. Questions about how the Code applies in particular situations should be discussed with the Head of Human Resources, who may seek further guidance from management where necessary.

## **4. Breach of the Code**

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Where management has reasonable cause to believe that a person subject to this Code has breached it – for example, by failing to disclose an actual or possible conflict of interest – the person will be informed of the basis for that belief and given an opportunity to respond. After considering the response and making any further inquiry warranted in the circumstances, management will determine the appropriate disciplinary and corrective action.

## Declaration and Confirmation

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I hereby declare and confirm that I have read and understood the contents of VASTIQ's Code of Ethics and Business Conduct.

Pursuant to the above, I declare and confirm that, to the best of my knowledge, there is no conflict of interest on my part that is inconsistent with the Code. I further declare that the information stated in the attached Schedule is correct, complete and up to date, and that no material fact or information has been omitted.

I will promptly notify the Human Resources Department if any part of the said information proves to be untrue or incorrect in any respect after the date of this declaration. In the absence of such notification, the Company is entitled to assume that the information furnished is true and correct and remains unchanged.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Staff ID: \_\_\_\_\_

NRIC / Passport No.: \_\_\_\_\_

Department: \_\_\_\_\_

Date: \_\_\_\_\_

## Schedule – Declaration of Interests

### 1. Interests in shares in any privately held company (Sdn. Bhd.) – direct and/or indirect

No.	Name of Company	Nature of Business / Industry	Direct / Indirect Interest	Percentage of Shareholding
<i>e.g.</i>	<i>ABC Sdn Bhd</i>	<i>F&amp;B Services</i>	<i>Direct</i>	<i>10%</i>

### 2. Active directorships in any company (Berhad and/or Sdn. Bhd., including dormant entities)

No.	Name of Company	Nature of Business / Industry	Status of Company	Date of Appointment
<i>e.g.</i>	<i>ABC Sdn Bhd</i>	<i>F&amp;B Services</i>	<i>Active</i>	<i>1 Jan 2023</i>

### 3. Ongoing service contracts in any company (Berhad and/or Sdn. Bhd.)

No.	Name of Company	Nature of Service Contract	Date of Appointment	Contract Duration
<i>e.g.</i>	<i>ABC Sdn Bhd</i>	<i>Consultant</i>	<i>1 Jan 2023</i>	<i>2 years</i>