

THRIVEN GLOBAL BERHAD

[Registration No. 198901005042(182350-H)]

(Incorporated in Malaysia)

CORPORATE CODE OF CONDUCT

1. INTRODUCTION

Our Corporate Code of Conduct ("the Code") forms an integral part of our corporate governance framework and is part of our commitment to observe and adhere to high standards of corporate responsibility and conduct ourselves rightly.

2. OBJECTIVES

The Code is intended to provide guidance for directors, senior executives and other employees regarding the standards we expect in the conduct of business. The Code also guides us to operate at high standards of business integrity, to comply with the relevant laws and regulations and to ensure that the Code is never compromised for the sake of results.

3. OUR CONDUCT

- **We must act honestly and in good faith**

All employees and officers have a duty of care and diligence in fulfilling the powers and functions of their roles. No employee or officer should engage in conduct that is likely to bring discredit upon Thriven Global Berhad and its subsidiaries ("Thriven Group").

- **We must not disclose confidential information**

In the normal course of our employment at Thriven Group, we may learn confidential information about Thriven Group and/or whom it does business with. We must not use or disclose this confidential information to any party unless authorised to do so.

- **We must make proper use of company assets**

Company assets are specifically provided to employees and officers for use in the course of their work. Prior authorisation must be obtained before any asset is used outside the scope of an employee's course of work.

- **Health, safety and environment implications must be regarded before making any business decision**

We must ensure that our business decisions do not compromise our commitment, to avoid any injury to people or damage to the environment and ensuring we comply at all times with the appropriate laws.

- **We must avoid conflicts of interests**

In instances where our personal interests conflict with those of Thriven Group, we must remove or manage the conflict so as to avoid loss to Thriven Group or Thriven Group's customers. Circumstances would include but not be limited to, the receipt of secret commissions or other payments not directly from Thriven Group.

This should be read in conjunction with the Conflict of Interest Policy (“**COI Policy**”) of Thriven Group, whereby the officers concerned must disclose and declare their interest in contemplated transaction or contract of any actual conflict of interest, potential conflict of interest or perceived conflict of interest, using the prescribed standard form set out in the COI Policy of Thriven Group.

- **We must understand how company policies and procedures relate to our work**

All employees and officers must be aware of company policies and procedures, and how the policies relates directly to their work. This includes a working knowledge of the company and divisional delegations of authority, to ensure no employee exceeds their respective limits in committing Thriven Group verbally or in writing.

- **We must comply with all laws and regulations**

Thriven Group takes seriously its obligations as a company to comply with all relevant laws and regulations affecting its business. All employees and officers of Thriven Group are expected to comply at all times with all laws and regulations relevant to their functions and tasks within the organisation.

Employees and officers should report any breaches of relevant laws or regulations to the Company Secretary for further action.

Thriven Group had on 1 January 2020 adopted a new Employee Handbook which includes the Employee's Code of Conduct and Whistleblowing Policy. The Whistleblowing Policy is intended to provide secure and confidential communication channel and protection for all stakeholders including staffs who raise concern in relation to irregular and unlawful practices.

- **We must not be involved in any corrupt acts**

Thriven Group adopts a strict zero-tolerance towards all forms of bribery and corruption and undertakes to comply with all the relevant applicable anti-bribery and anti-corruption laws in all the jurisdictions the Group operates in.

All employees and officers of Thriven Group are expected to comply with the applicable corruption laws at all times and shall never offer, give, solicit or accept bribes or any other improper payment in order to achieve business or personal advantages for themselves or other persons, or engage in any transaction that can be construed as having contravened the anti-corruption laws.

Essentially, all employees and officers of Thriven Group are prohibited from:

- i. giving or promising or offering directly or indirectly to any person anything that could be regarded or considered or viewed as a gratification (as defined under Malaysia Anti-Corruption Commission Act 2009 and any statutory modification, amendment or re-enactment thereof for the time being in force); or
- ii. soliciting or receiving or agreeing to receive directly or indirectly by himself or any other person; or
- iii. make or submit false, inaccurate, misleading or exaggerated records, invoices, claims with the intention to deceive the principal;

regardless whether for the benefit of that himself or of another person including his family with intent to obtain or retain business for Thriven Group or to obtain or retain an advantage in the conduct of business for Thriven Group.

All employees and officers are expected to report as soon as possible to the Anti-Bribery and Corruption Compliance Team if he/she knows or suspects a breach of any applicable corruption laws. Failure to do so may lead to a sanction under the applicable laws.

All employees and officers are also expected to familiarise themselves with the Thriven Group's Anti-Bribery and Corruption Policies and Procedures and act in accordance with them.

- **We promote and maintain a culture of lawful and ethical behavior**

Thriven Group encourages all employees and officers to react promptly in good faith, any violations or suspected violations of the Code.

4. CONSEQUENCES OF BREACHING THE CODE

Any employee or officer who breaches the Code will face disciplinary action which, depending on the severity of the breach, could result in a dismissal or a legal action being initiated against the person, or both.

Reviewed and adopted by Board: 21 November 2023