DUOPHARMA

Code of Conduct

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Duopharma Biotech Berhad's ("DUOPHARMA BIOTECH ") Code of Conduct is a general reference for use in all the countries in which DUOPHARMA BIOTECH conducts operations. It does not describe all applicable laws, regulations or DUOPHARMA BIOTECH policies, nor give full details on any particular law, regulation or policy. It does not constitute legal advice. It does not constitute nor create a contract of employment. DUOPHARMA BIOTECH reserves the right to modify, revise, cancel or waive any policy, procedure, regulation or condition without notice and without revision of our Code. Since DUOPHARMA BIOTECH operates in various jurisdictions, DUOPHARMA BIOTECH also reserves the right to modify the provisions of our Code to adapt our Code to the requirements of the respective local jurisdiction, applicable legislation and social conditions.

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A. REVISION HISTORY RECORD

Revision Date	Change Description	Revision No.	Revised by
17 September 2020	Adopted the policies in CCM Berhad to Duopharma Biotech	01	Group Internal Audit & Integrity
26 July 2023	Revision of the COC due to restructuring & additional statement under clause 7.1	02	Group Risk Management & Integrity and Group Human resource
22 January 2025	Insertion Clause 7.6 for adoption of the Labour Rights Policy	03	Group Risk Management & Integrity and Group Human resource
14 May 2026	Insert the role of Group Chief Executive Officer to align with the current organisational structure	04	Group Risk Management & Integrity

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PART A: INTRODUCTION

The Board of Directors ("**Board**") of Duopharma Biotech Berhad ("**Duopharma Biotech")** is committed to its role in establishing a corporate culture which engenders ethical conduct that permeates throughout Duopharma Biotech and its subsidiaries (the "**Duopharma Biotech" or "the Group**"). This includes adopting best practices in corporate governance and observing high standards of behaviour and integrity in our businesses and activities, including dealings with business partners, customers, suppliers and other stakeholders, and in the communities and environment in which the Duopharma Biotech conducts its operations.

Duopharma Biotech has adopted this Code of Conduct to formalise and commit to ethical values and standards of conduct expected. Our Code is based upon and supplements Duopharma Biotech's vision, mission and core values; embodies several of the principles contained in various policies adopted by The Group; and gives guidance on how Duopharma Biotech Employees and other people affected by the Code should apply our core values to the Duopharma Biotech's businesses and activities. Duopharma Biotech also committed to ensuring the progressive implementation from time to time of appropriate internal systems to support, promote and ensure compliance with our Code.

Each employee of the Duopharma Biotech has a role to play in enabling the Duopharma Biotech to achieve sustainable performance and to deliver value to our customers, shareholders and other stakeholders without compromising our ethical standards, values and reputation, and in upholding and enforcing our Code. All Duopharma Biotech Employees are expected to conduct themselves professionally in their work and dealings, and comply with our Code.

Duopharma Biotech Officers, Employees and Stakeholders may access the full version of our Code on our intranet and also made available on our corporate website.

PART B: THE FOUNDATION OF OUR CODE - DUOPHARMA BIOTECH 'S VISION, MISSION & VALUES

Our Vision: *Providing Smarter Solutions For a Healthier Life.*

Our Mission: *Leading Healthcare Group Providing Quality and Innovative Solutions.*

Our Core Values:

Passion *– We inspire and energise everyone to be the best.*

Excellence *– We consistently deliver outstanding performance through innovative solutions.*

Teamwork *– We succeed together because we work as one.*

Integrity – *We conduct ourselves with pride in being honest and ethical.*

Responsible *– We honour the trust given to us by being accountable for our actions.*

Respect *- We value differences and sincere intentions as the basis for achieving shared aspirations.*

PART C: ABOUT THE CODE OF CONDUCT

1. Purpose

Our Code sets out standards with which the Duopharma Biotech's Employees are required to comply with when dealing with one another, business associates, other stakeholders and the broader community. Our Code is not exhaustive, and the Duopharma Biotech has developed or will develop specific detailed policies, procedures, directives and/or guidelines to support, promote or ensure compliance with our Code. Our Code is to be read and applied in conjunction with such policies, procedures, directives and guidelines.

2. Applicability

Our Code applies to:

- Employees (permanent, temporary and contractual) of Duopharma Biotech subsidiaries and affiliated companies, regardless of the location of the employment.
- All our business activities and all our dealings with one another, the authorities, shareholders, customers, suppliers and other stakeholders; and

All Duopharma Biotech Employees must comply and abide with:

- the Code of Conduct;
- all applicable laws and regulations;
- other policies, procedures, directives and guidelines of Duopharma Biotech;
- Duopharma Biotech Core Values.

Failure to comply may lead to the commencement of disciplinary proceedings that may result in dismissal or termination of employment and/or appointment with the Duopharma Biotech. In addition, if any member of the Duopharma Biotech Employees breaks the law, he/she may also be personally liable for his/her action.

Duopharma Biotech Employees must familiarise themselves with the Code of Conduct and other policies, procedures, directives and guidelines of Duopharma Biotech. If you discover any conflict or inconsistency between the provisions of the Code of Conduct and the provisions of any other policy, procedure, directive or guideline of Duopharma Biotech you must inform your line manager of the inconsistency(s) and Duopharma Biotech Group Risk Management & Integrity separately. If there are any questions about the Code of Conduct and its application, please request your line manager or Duopharma Biotech Group Risk Management & Integrity for assistance and clarifications.

The Group Managing Director ("GMD") / Group Chief Executive Officer ("GCEO") has the overall responsibility of Duopharma Biotech's Code of Conduct. The Head of Group Risk Management & Integrity will be responsible for undertaking a formal assessment of the compliance and effectiveness of the Code of Conduct and any emerging matters and reporting this to the Risk Management Committee and GMD/GCEO .

How to deal with issues that you are uncertain of its appropriateness?

If you are confronted with a situation or are considering behaviour and are still unsure of its appropriateness, ask yourself these questions:

- Is it consistent with our Core Values and in line with our policies, procedures, directives and guidelines?
- Would I be comfortable telling my Employees and friends?
- Would it look ok on the news broadcasted by a television or radio channel or if it appeared in a newspaper or other media?
- Is it ethical and legal?

or consult your line manager and/or the Group Risk Management & Integrity.

All employees shall, if in doubt as to the nature or purpose of the transaction consult the Head of Group Risk Management & Integrity who shall decide, either in consultation with the GMD/ GCEO and /or Risk Management Committee Chairman or through his own accord, the next course of action.

3. Reporting and Review

Duopharma Biotech's Employees and Stakeholders are to report any breach of compliance with our Code.

The reporting of non-compliance with our Code may either be made to:

(i) Head of Department; or
(ii) the GMD/GCEO;

or made in accordance with Duopharma Biotech Whistleblowing Policy which aims to:

(a) encourage Duopharma Biotech Employees and Stakeholders to feel confident in raising serious concerns;
(b) provide a formal channel for Duopharma Biotech's Employees and/or stakeholders to raise their concerns and receive feedback on any actions taken;
(c) ensure that the individuals responsible for such serious misconduct will be dealt with in an appropriate manner.
(d) ensure that Duopharma Biotech's Employees and/or Stakeholders response to their concerns and ensure that they are aware of how to pursue their concerns if they are not satisfied with the response given; and
(e) reassure them that they will be protected from possible reprisals or retaliation if the whistleblowing reports have been made honestly with a reasonable belief that the information and allegations are true.

Amendments to our Code must be approved by the Group Management Committee of Duopharma Biotech Berhad and endorsed by the Risk Management Committee. The Group Risk Management & Integrity will review the Code of Conduct on a triennial basis unless determined otherwise earlier by the Head of Group Risk Management & Integrity (HGRMI).

See also Duopharma Biotech's Whistleblowing Policy.

4. Discipline

The maintenance of discipline, good conduct and good behaviour amongst the Duopharma Biotech Employees are important in running the business and is for the common good of Duopharma Biotech and its stakeholders.

The term "misconduct" means an improper behaviour, act or conduct in relation to duties or work which is inconsistent with the due performance of obligations to Duopharma Biotech and includes a breach of discipline or violation of the Code of Conduct or the rules and regulations as set out in any handbooks, policies, guidelines or procedure statements or in any documentation of Duopharma Biotech.

Subject to the requirements of applicable law, disciplinary action may be taken against any person to whom the Code of Conduct applies for misconduct or violations with laws, regulations, rules, policies and procedures.

See also the Duopharma Biotech's Employee Handbook, Section on Employee & Industrial Relations

PART D: CONDUCTING BUSINESS WITH INTEGRITY

1. Conducting Business Ethically, Fairly and with Honesty

Duopharma Biotech shall conduct its businesses ethically, fairly, honestly and with integrity. Duopharma Biotech and Duopharma Biotech Employees must not take unfair advantage of any other person, including without limitation participating in illegal practices - for example, misleading and deceptive conduct, misrepresentation and undue influence, as well as conduct which is legal but unethical. Corrupt practices are not acceptable and strictly prohibited.

See also Duopharma Biotech's Business Ethics Policy.

Duopharma Biotech Employees shall additionally abide with and support all pledges or undertakings made by the Duopharma Biotech to any organisation, institution or party (whether government-related or non-government organisation and whether made voluntarily or pursuant to regulatory compliance) relating to the conducting of businesses ethically, and with integrity.

2. Complying with Laws

The businesses and activities that Duopharma Biotech is involved in are highly regulated. Regulatory compliance is about complying with all laws, by-laws, ordinances, rules, regulations, directives, license/permit conditions, codes, standards and terms and conditions of agreements and contracts.

Duopharma Biotech Employees must 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. We must comply with our regulatory obligations in the territories that Duopharma Biotech operates.

Failure to comply can impact the operations of Duopharma Biotech's businesses and can result in prosecution, fines, penalties, damages and losses for Duopharma Biotech, as well as the termination of employment or appointment, or imprisonment for Duopharma Biotech Employees.

3. Working with Uncompromising Honesty

3.1 Anti-Bribery & Anti-Corruption Policy

Bribery and Corruption

Bribery is a direct or an indirect offer to give or receive anything of value with the intention of corruptly influencing the behaviour of someone to obtain or retain a commercial advantage, such as to award new business, continue existing business or to gain any improper advantage.

Employee's Responsibility

1) To Act Honestly and With Integrity in All Dealings

All forms of bribery are prohibited. Duopharma Biotech's Employees must not provide, offer or accept bribes, kickbacks, corrupt payments, facilitation payments, or inappropriate gifts; to Government Officials or any commercial person or entity, regardless of local practices or customs.

This restriction applies to all employees, contractors, consultants and anyone acting on behalf of the Company when dealing with job applicants, clients (prospective and current), suppliers, partners and anyone else that they come into contact during the course of their employment/engagement.

2) To Evaluate and Respond to the Corruption Risk

All Employees must understand the Code of Conduct and evaluate the impact on their responsibilities. In doing so, one must:

- evaluate the corruption risk affecting the Employee's area and responsibilities;
- take the necessary step to prevent the risk; and
- handle the corruption or unethical issue in hand in a proper manner, should it arise.

Corruption risk must be assessed on an ongoing manner within each business area with the appropriate risk reporting, establishment of mitigation plans and internal controls in place. The monitoring plans must be established and prioritised according to the risk rating.

3) Notify Any Alleged Violations to the Policy

Any Employees who know of a potential violation of applicable laws or this Policy is required to report his or her suspicion promptly in accordance with the ***Whistleblowing Policy***.

Anyone who reports a possible violation of applicable laws, policies and/or the Code of Conduct will be protected from retaliation in any form. Employees, supervisors and managers must promptly report suspected violations of any anti-bribery laws and the Code of Conduct to Group Risk Management & Integrity or and may do so anonymously.

See also Duopharma Biotech's Anti-Bribery and Anti-Corruption Policy.

3.2 Conflict of Interest

A conflict of interest arises when an Employee's personal activities or relationship interfere with his or her objectivity in doing what is best for the Company. Conflicts of interest, be it real, potential and even by appearance, can result in serious consequences for the Employees of the Company. Conflicts of interest can occur in both direct and indirect situations. Duopharma Biotech Employees are expected to diligently avoid such conflicts.

Duopharma Biotech Employees must disclose any outside activities, financial interest or relationship that may pose a real, potential or perceived conflict of interest. Disclosures are to be made to Head of Department and subsequently communicated to the Head of Group Risk Management & Integrity (HGRMI). The Head of Department's recommendation/approval must be obtained before accepting any position as an officer or director of outside business activities. In any event, the Head of Department can decide to consult the GMD/GCEO before granting the approval.

Duopharma Biotech Employees must notify the management before serving on the board of a charitable, educational, or other nonprofit organization. Acceptance of a directorship without prior approval from the Head of Department and the GMD/ GCEO is a misconduct.

Duopharma Biotech Employees must periodically update their Head of Department (HOD) regarding any activity that has previously been disclosed pursuant to this Principle.

All employees should avoid situations where their personal interest conflicts with Company interest. It is not possible to specify all circumstances where this can happen but some examples are given below:-

Without prior written permission and required declaration of interest, employees are prohibited from:-

a) Working as an employee, proprietor or director of another company or partnership
b) Having an interest in another organisation having business dealings with the Company
c) Selling or leasing property, services or equipment to the Company
d) Engaging in any other business or activities, e.g direct selling for financial gain or advantage
e) Speaking in a public forum on business-related matters without the prior permission of the Head of Department. The ultimate reporting Group Management Council (GMC) member and the GMD/GCEO should be copied in the request and the approval obtained.

Serving as a director, consultant or agent to a competitor of the Company including multi-level marketing companies is a serious misconduct and it's strictly prohibited.

See also Duopharma Biotech's Declaration of Interest Policy.

3.3 Gift, Hospitality and Entertainment

Accountabilities

Employees are responsible for ensuring that their own conduct meets the required standards of integrity. They place the Duopharma Biotech's interest above their own interests when carrying out their duties. This includes declaring all gift offers in accordance with this policy and refusing prohibited gifts (a *reference to section 8 – Prohibited Gifts/Hospitality)*. The Chairman, the GMD/GCEO and Employees with direct reports are responsible for being aware of, and monitoring, the risks inherent in their team's work and functions. They model good practise and promote awareness of this policy and related processes.

Focus Area

Duopharma Biotech recognizes that it is customary for its employees, customers, suppliers and other business partners to occasionally exchange small gifts, often promotional in nature. Gifts can be defined as benefits of any kind given to someone as a sign of appreciation or in a cultural recognised occasion without expectation of receiving anything in return. The gifts received or given are “gifts” when there are no strings attached to the gifts by the giver or receiver. In other words, there should not be any reciprocity involved. Cash and gifts that are cash equivalent (e.g. shopping coupons) is prohibited.

'Hospitality' is the friendly reception and treatment of guests. It includes offers of food, drink, travel, accommodation, events or activities (e.g. sporting, social, industry, arts, entertainment or other events/activities). The hospitality should be modest and does not raise a conflict of interest.

Business entertainment can play an important role in strengthening working relationships amongst business partners. Accordingly, a Duopharma Biotech Director, Officer and/or Employee may accept or provide business entertainment offered for legitimate business purposes, such as building goodwill and enhancing relationships with customers or suppliers. Specifically, accepting or providing entertainment is permitted only if such entertainment is occasional, is reasonably related to a legitimate business purpose and is not given as an inducement or kickback to obtain or retain business.

See also Duopharma Biotech’s Gift and Hospitality Policy.

Payments to External Parties

Other than in the circumstances outlined in the Gifts and Entertainment section above or any related parties or in accordance with “The Mexico City Principles”. Duopharma Biotech Employees is not allowed to directly or indirectly offer or make payments in cash or in-kind to any party or person (including but not limited to Government officials, business partners (e.g. suppliers and customers) or their spouses, dependents or Duopharma Biotech Employees in an attempt to influence them in their business dealings with any member of the Duopharma Biotech.

See also Duopharma Biotech’s Anti-Bribery and Anti-Corruption Policy

3.4 Sponsorship from Business Associates

Sponsorships which are accepted directly by the Company/Duopharma Biotech’s Sports Club (“PETIRR DBB”) personnel must be monitored for compliance by the Group Risk Management & Integrity or the Integrity Champions at the respective regional offices, and must be receipted and reported in accordance with procedures outlined in the Sponsorship Policy.

Written approval must be obtained from the highest approving authority in the Company prior to submitting the request pf sponsorship to business associates.

See also Duopharma Biotech Sponsorship Policy

3.5 Corporate Donation and External Sponsorship

Contributions for a charitable donation and external sponsorship should be aligned with the Corporate Social Responsibility Policy, Companies Code of Conduct as well as other policies developed by the Company.

The Company will not provide sponsorship to organisations, individuals or related parties that are:-

- Involved in any current planning, regulatory or legal matter involving the Company
- Involved in political fields (e.g political parties, individuals or affiliates)
- Involved in or associated with products or services related to pornography, firearms, nuclear, human or animal trafficking, gambling products or services, the chemical reaction that potentially brings negative impact as a whole.

See also Duopharma Biotech's Charitable Donation and External Sponsorship Policy

3.6 Political Sponsorship

It is the policy of the Duopharma Biotech to discourage or not allow the employees of the Company to proceed or involve or provide with any political sponsorship to the support or oppose political parts(s), individuals or affiliates.

See also Duopharma Biotech's Anti-Bribery and Anti-Corruption Policy

3.7 Competition Law

Duopharma Biotech Employees must comply with all applicable competition laws. Duopharma Biotech Employees must strive to adhere to and operate within all laws intended to protect and promote free and fair competition.

Duopharma Biotech Employees should familiarize themselves with and always follow all guidelines, policies, manuals and directives issued by Duopharma Biotech pertaining to compliance with applicable competition laws. Breaching the provisions of such laws may result in Duopharma Biotech incurring financial penalties being exposed to legal action by aggrieved parties and damage to Duopharma Biotech's reputation. Below are key provisions which must be complied with in this regard but they are by no means meant to be exhaustive.

Key Provisions

- Duopharma Biotech Employees must not talk with or share information (directly or indirectly) with competitors to fix prices or other terms of sale, set production levels, divide up markets, customers or territories, or boycott any customer.
- Duopharma Biotech Employees should not be involved in any discussions on details of pricing, costs, profits, trading terms, marketing and distribution plans or new product launches with competitors or trade associations.
- When in contact or communicating with Duopharma Biotech's customers, the following acts are prohibited:
  a) disclosing the commercial terms of one customer to another customer;
  b) passing commercially sensitive information to competitors through customers;
  c) imposing conditions of sale that can exclude competitive products or limit a customer's scope of resale;
  d) fixing resale prices;
  e) forcing a customer to buy other products which have no connection with the products being purchased or requested (tying practices);
  f) refusing to supply products to any customer without any objective justification;
  g) selling goods at excessively low prices hence preventing a new entrant or forcing existing competitors out of the market; and
  h) charging different prices or imposing different commercial terms on customers in equivalent transactions without any objective justification.

- If any of the above-prohibited matters or other competition sensitive matters are raised or discussed in any trade association meeting or other meetings with competitors (whether formal or otherwise), Duopharma Biotech Employees should immediately object to such discussion and leave the meeting.
- Duopharma Biotech Employees should not enter into any exclusive arrangements on behalf Duopharma Biotech with any customer or supplier unless the said arrangement has been approved by Duopharma Biotech's Legal and Secretarial Department.
- Duopharma Biotech Employees should refrain from using competition sensitive language for all internal and external communication. For example, phrases like "being dominant in the market", "killing off a competitor", "forcing a competitor out of the market", "preventing a competitor from entering the market" or suggesting in any way that Duopharma Biotech is not in compliance with any laws or is acting unlawfully.

See also Duopharma Biotech's Competition Law Compliance Policy & Manual.

3.8 Securities and Insider Trading

As regards dealings in the shares or securities of Duopharma Biotech, or of any other public listed company connected with or related to Duopharma Biotech, certain restrictions have been placed by laws and regulations, including without limitation the Capital Markets And Services Act, 2007 and the listing requirements of any stock exchange on which the shares or securities of any member of the Duopharma Biotech are listed or traded. Duopharma Biotech Employees having access to unreleased price-sensitive information must avoid conduct known as "Insider Trading" and avoid any adverse inference being drawn from unfair dealings by them. Violation of insider trading laws could result in criminal charges being brought against the defaulting Duopharma Biotech Employees.

4. Providing Quality and Safe Products

4.1 Innovation, Quality and Halal

Duopharma Biotech is committed to contributing to society by providing high-quality products whilst creating value for our stakeholders. To this end, Duopharma Biotech is committed to Total Quality Management and we aim to achieve Total Customer Satisfaction and to be recognised as a preferred supplier of innovative and quality products and services that consistently meet our customers' evolving needs, whilst meeting all regulatory requirements.

Duopharma Biotech also recognises that in addition to providing assurance to Muslims, Halal certification also benefits everyone, as the products would have strictly adhered to additional stringent requirements which have high standards of safety, efficacy, quality and hygiene conditions. Duopharma Biotech is committed to manufacturing, import and distribute consumable products which are in compliance with the requirements of the authorised Halal Certification bodies and other related regulatory bodies, and will likewise ensure that the non-consumable products which we manufacture, distribute meet the same high standards of safety, efficacy, quality and hygiene conditions. In the course of carrying out Duopharma Biotech's activities, businesses and operations, Duopharma Biotech Employees will actively and continuously comply with relevant applicable standards as set by authorised Halal Certification bodies and other related regulatory bodies, including without limitation complying with the requirements of Halal Zones that may be designated from time to time within any of Duopharma Biotech's premises, vehicles or area of operations.

See also Duopharma Biotech's Halal Policy.

5. Protecting the Company's Assets and Information

5.1 Information Communication Technology

All Duopharma Biotech's computer and other information and communication technology ("ICT") facilities must be safeguarded against theft, damage and improper usage. Duopharma Biotech does not permit the usage of ICT facilities involving sensitive and illegal matters, infringement of intellectual property rights, unauthorised access, misuse of the Duopharma Biotech's time and resources and risking of the integrity of Duopharma Biotech's ICT facilities.

To the extent allowed by applicable laws in the respective countries in which Duopharma Biotech Group operates, Duopharma Biotech reserves the right to monitor each Duopharma Biotech Employees's email messages, use of the internet and contents in company-issued ICT facilities. This information can be recovered and used as evidence in domestic proceedings and courts of law or disclosed to the authorities or regulatory bodies as the case may be.

Each Duopharma Biotech Employees must use Duopharma Biotech's ICT facilities responsibly and primarily for the business purposes for which they are intended. The ICT facilities include access to the internet, intranet, email services and all other ICT hardware, software, systems and peripherals.

See also Duopharma Biotech's Information Communication And Technology (ICT) Policy.

5.2 Confidentiality, Privacy And Protection Of Company Assets

Duopharma Biotech values and protects all confidential, proprietary and personal data information. Duopharma Biotech Employees may be given by or may have obtained access to confidential, proprietary or personal data information from any member of the Duopharma Biotech or Duopharma Biotech's customers, suppliers or other stakeholders/parties.

Duopharma Biotech Employees must take measures to avoid unauthorized disclosure, e.g. by securing access to confidential company records. Duopharma Biotech Employees must not communicate or disclose confidential, proprietary or personal data information to competitors, customers, suppliers, consultants, service providers, trade associations or other third parties unless such communication or disclosure is authorised by Duopharma Biotech and a non-disclosure agreement (or confidentiality agreement) has been signed. Confidential, proprietary or personal data information or ideas received from third parties should not be used, processed, disclosed or communicated unless the third parties' consent has been obtained and the appropriate safeguards are in place. Any confidential, proprietary or personal data information must not be disclosed or discussed outside the scope for which the information was provided.

- Duopharma Biotech Employees must be aware that any unlawful or unauthorised disclosure of confidential, proprietary or personal data information may result in irreparable loss and/or damage to the Duopharma Biotech. In such cases, Duopharma Biotech or the relevant Duopharma Biotech entity may institute civil and criminal proceedings against the offending party. Any Duopharma Biotech Employees found guilty of such misconduct may also be subject to disciplinary action which may include dismissal.

- It is equally important that confidential, proprietary or personal information is only disclosed to other Duopharma Biotech Employees on a need to know basis.

All Duopharma Biotech Employees have an obligation to continue to preserve the confidential, proprietary and personal data information even after the appointment/employment has ceased unless disclosure is required by law, an order of any court of competent jurisdiction or any competent judicial, governmental or regulatory authority.

Misappropriation of property owned by Duopharma Biotech Officers Employees, customers or suppliers will not be tolerated. Any misappropriation should be reported immediately and properly investigated. Appropriate disciplinary and/or legal action will be taken.

In recognizing the importance of respecting the privacy rights of individuals, Duopharma Biotech is also committed to ensuring compliance with the requirements of applicable laws relating to the protection of personal data (e.g. the Malaysian Personal Data Protection Act 2010). Therefore, it is the responsibility of all Duopharma Biotech Employees to assist Duopharma Biotech to comply with such laws and Duopharma Biotech's Data Protection Compliance Policy. Breaching the provisions of such laws or policy may result in Duopharma Biotech and Duopharma Biotech Employees incurring penalties and being exposed to legal action by aggrieved parties. There may also be negative publicity as a result of any breach that is made public.

See also Duopharma Biotech's Data Protection Compliance Policy.

5.3 Intellectual Property

Intellectual property ("IP") is a property right derived from creations of the mind through intellectual or discovery efforts in industrial, scientific, literary and artistic fields which can be developed, commercialised and protected. Examples of IP include patent, trademark, copyright, industrial design, trade secrets and know-how. In accounting or financial terms, it is regarded as an intangible asset. The role of IP and its proper management is crucial in realising the vision and mission of the Duopharma Biotech.

Duopharma Biotech has acquired or developed valuable IP. Duopharma Biotech Employees have a responsibility to protect these assets.

Duopharma Biotech owns the IP rights to anything that Duopharma Biotech Employees create or develop during the course of their employment with the Duopharma Biotech (e.g. a report, advertising campaign, web pages, software, a product, service, process or concept, a brand, a song, etc.). Duopharma Biotech is entitled to the exclusive benefit of the works created by Duopharma Biotech Employees and may require that the relevant Duopharma Biotech Employees assigns his/her rights, interests and benefit in the whole wide world including waiving his/her moral rights to those works.

Duopharma Biotech is committed to formulating, monitoring and enforcing effective IP creation, acquisition, protection and governance processes within Duopharma Biotech. For the purpose of achieving the said objectives, a set of processes have been created and embodied in an IP Manual in which the standard operating procedures are outlined in detail. The IP Manual is to be adhered to by all Duopharma Biotech Employees of Duopharma Biotech.

Any acquisition, disposal, transfer, licensing of or dispute relating to IP must be referred to Duopharma Biotech's Group Legal and Secretarial Department for assistance. The acquisition, maintenance, disposal, transfer or licensing of patents, trademarks, copyrighted works or other IP rights is subject to the Management approval and contractual safeguards. In any event, no statement regarding the ownership, validity, scope, or enforceability of IP rights should be made by Duopharma Biotech Employees without the involvement of Duopharma Biotech's Group Legal and Secretarial Department.

See also Duopharma Biotech's Intellectual Property Policy And Manual.

5.4 Careful Communication

Duopharma Biotech Employees are not allowed to spread malicious rumours about any member of the Duopharma Biotech and misrepresenting the Duopharma Biotech to others.

Duopharma Biotech Employees are also required not to make defamatory, slanderous, seditious or derogatory statements and not to infringe or authorise any infringement of copyright or any other legal right by email or other forms of communication. Any such communication will not be condoned by Duopharma Biotech and is outside the scope of the employment of the individual concerned. Duopharma Biotech will not accept any liability in respect of such communication, and the employee responsible will be personally liable for any damages, penalties or other liability arising.

6. Maintaining Complete and Accurate Business Records

6.1 Proper Documentation and Authorisation

The Company expects that all business transactions are documented properly. The Company has a Limits of Authority (LOA) in place to govern the authorizations required in doing business. All Duopharma Biotech Employees must be aware of the LOA and follow them without any attempt to bypass requirements. The Limits of Authority can be obtained from Group Finance on a need to know basis.

6.2 Risk Management

Duopharma Biotech recognises the broad spectrum of risks which the company faces along with the opportunities which it seeks in its businesses and operations. It is a strategic objective of the Duopharma Biotech to have an effective risk management programme and control systems to assess and mitigate these risks and thereby facilitate the Duopharma Biotech in meeting all its business objectives. The Duopharma Biotech is committed to developing and maintaining a risk management culture in Duopharma Biotech Employees through leadership, education, communication and consultation so that the risk-based approach is effectively embedded in its business processes and operations.

See also Duopharma Biotech's Enterprise Risk Management Framework.

6.3 Accounting And Procurement Procedures

Duopharma Biotech Employees must observe prescribed accounting, financial and procurement procedures and comply with the requirements of Duopharma Biotech's internal control policies, guidelines and procedures. All transactions must be accurately and properly recorded in the books of accounts. Off the record funds and accounts are strictly prohibited.

See also Duopharma Biotech's Finance And Accounting SOPs and Duopharma Biotech's Group Procurement Policy and Procedures.

6.4 Records Retention

Duopharma Biotech Employees is expected to comply with the relevant laws depending on the documents to be retained. However, generally, the practice is to retain for 7 years.

7. Respecting Others in the Workplace and Society

7.1 Equal and Fair Employment Practices

Duopharma Biotech Berhad is committed to the principle of equal employment opportunity for all and to providing employees with a work environment free of discrimination and harassment. All employment decisions including but not limited to recruitment, promotion, compensation, benefits, training are based on merit, competency and experience without regard to race, gender, age, nationality, religion, disability and marital status. Duopharma Biotech Berhad will not tolerate discrimination or harassment based on any of these characteristics.

Duopharma Biotech Berhad supports and respect the protection of internationally proclaimed human rights and ensure that we are complicit of human rights abuses. Thus, we encourage reporting of all perceived incidents of discrimination or harassment. It is the policy of Duopharma Biotech Berhad to promptly and thoroughly investigate such reports. We prohibit retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports.

See also Duopharma Biotech's Diversity, Anti-Discrimination & Anti-Harassment Policy

7.2 Workplace Health & Safety

Duopharma Biotech Berhad is committed to provide a safe and healthy working environment for all of our employees in our entire operations. Thus, we manage and mitigate injuries or harm to our employees by implementing appropriate controls, safe work procedures, preventative maintenance, and protective measures in the workplace. A safety culture among our employees is created via relevant safety initiatives that educates them on work safety and risk as well as ways to manage the risks and emergency procedures. Any injuries or harm that befalls our employees will be recorded for future prevention and the necessary medical treatment will be provided. Smoking is strictly prohibited at Duopharma Biotech Berhad’s premises except for a few designated smoking areas. This policy is enforced to our contractors as well as our other stakeholders. We encourage our employees to raise any safety concerns without fear of reprisal.

See also Duopharma Biotech Sustainability Policy, Safety Policy.

7.3 Prevention & Eradication of Drug, Alcohol & Substance Abuse

Duopharma Biotech views seriously the case of Duopharma Biotech’s Employees (or contractors on-site) using illegal drugs or indulging in alcohol and other substance abuse at the workplace. Appropriate actions will be instituted against anyone who presents himself at work under the influence of illegal substances or, possesses, distributes, or sells illegal drugs in the workplace.

See also Duopharma Biotech's Prevention And Eradication Of Drug, Alcohol And Substance Abuse (PEDAS) Policy.

7.4 Carbon Footprint

Duopharma Biotech Berhad pledges to implement a sustainable supply chain for our entire operation to reduce our carbon footprint. It is our policy to support a precautionary approach to environmental challenges caused by our operations. Thus, we undertake initiatives to promote greater environmental responsibilities and encourage the development and diffusion of environmentally friendly technologies in our entire operations.

We will achieve this according to:

Energy

We measure and analyse the carbon footprint of our business activities in conjunction with other climate change mitigation and adaptation efforts. We are committed to continual improvement in energy efficiency. This is managed through the incorporation of energy efficiency measures into our facilities and promoting efficient energy use in all areas of business activity. We pledge to invest in renewable energy technologies to reduce our energy consumption. We ensure our staff are aware of the environmental impacts of their work activities and we encourage them to minimise those impacts through training and awareness programs.

Waste

We comply with all applicable environmental regulations. All required environmental permits, licenses, information registrations and restrictions shall be obtained and their operational and reporting requirements followed. We have systems in place to ensure the safe handling, movement, storage, recycling, reuse or management of waste, air emissions and wastewater discharges. Any waste, wastewater or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment. There are even systems in place to prevent and mitigate accidental spills and releases to the environment.

See also Duopharma Biotech's Sustainability Policy, Environmental Policy.

7.5 Corporate Social Responsibility

Duopharma Biotech Berhad recognizes the importance of being a responsible organization for our stakeholders. It is Duopharma Biotech Berhad's policy to conduct our operations in accordance with sustainability-related frameworks because we strive to be a trusted corporate citizen for the society.

1. We are committed to interacting and building relationships with a number of local community organisations in line with our commitment to operate in a sustainable manner. This is achieved by advocating volunteerism to our employees.

2. We are committed to ensuring our stakeholders are provided with education via collaborative programs.

3. We strive to promote humanitarian related initiatives in our business operations.

See also Duopharma Biotech's CSR Policy and Duopharma Biotech Sustainability Policy.

7.6 Labour Rights

As an organization, Duopharma Biotech Berhad is committed to upholding labour rights and maintaining a safe working environment for all workers while complementing and adhering to local laws, international standards, and existing internal guidelines, with the overall objective of aligning with high standards of governance and social responsibility expected from an organization.

With this in mind, Duopharma's Labour Rights Policy ("Policy") applies to all employees, the Board of Directors and business associates.

The following seven Key Material Issues are the pillars of the Policy:

- *Forced Labour & Child Labour:* Zero tolerance for modern slavery,including forced and child labour.
- *Diversity, Anti-Discrimination & Anti-Harassment:* Commitment to equal opportunities regardless of personal characteristics.
- *Freedom of Association & Collective Bargaining:* Respect for employees' rights to join trade unions and engage in collective bargaining.
- *Safety & Health:* Prioritization of a safe working environment in compliance with health regulations.
- *Fair Wages, Benefits & Social Security:* Assurance of fair compensation based on job responsibilities and performance.
- *Upskilling & Education:* Commitment to employee development through training and career advancement opportunities.
- *Employment Security & Protection Against Unfair Dismissal:* Assurance of fair procedures in managing disciplinary matters.

This Policy will be integrated into all Duopharma Biotech's operations, while mechanisms will be established to monitor compliance with the Policy.

Employees are encouraged to report violations via our currently established processes, without fear of retaliation. All employees are expected to adhere to the Policy and no exemptions can be granted, unless under exceptional circumstances or legal conflicts which is approved by the GMD/GCEO.

See also Duopharma Biotech's Labour Rights Policy

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