

## **CODE OF CONDUCT AND BUSINESS ETHICS**

### **PART I: OVERVIEW**

#### **1. INTRODUCTION AND SCOPE OF THE CODE**

This Code of Conduct and Business Ethics (“Code”) emphasises and advances the principles of discipline, good conduct, professionalism, loyalty, integrity that are essential to the success and well-being of the Life Water Berhad (“Life Water” or “the Company”).

The nature of this Code is not meant to cover all ethical situations that may occur. In any circumstance which is not covered by this Code or in case of any doubt, employees shall refer to his/her Head of Department (“HOD”) or the Company’s Head of Human Resources Department for guidance or clarification.

Employees should always be guided by the following principles:

- avoid any conduct that could damage or risk Life Water’s reputation;
- place the Company’s interest ahead of personal or other interests.
- maintain the highest professional image possible;
- treat fellow employees with respect and dignity;
- adhere at all times to management directives;
- respect and maintain all the rules of fair play and goodwill.

This Code shall apply to all Life Water’s Board of Directors and employees.

#### **2. BUSINESS CORE VALUES**

Life Water is committed to the highest standards of integrity, openness and accountability in the conduct of its business and operations. All employees have the responsibility to apply the core values towards its business practices:

- i. Loving
- ii. Initiative
- iii. Fairness
- iv. Execute
- v. Wealthy
- vi. Attitude
- vii. Teamwork
- viii. Efficient
- ix. Respect

This Policy shall apply to all Life Water’s Board of Directors and employees.

<b>Loving</b>	<ul style="list-style-type: none"> <li>Concern for the well-being of colleagues, customers, the less-fortunate, the communities and the environment</li> </ul>
<b>Initiative</b>	<ul style="list-style-type: none"> <li>Freedom to suggest areas for improvements in company operation and management, Company CSR programmes and to dispense</li> </ul>
<b>Fairness</b>	<ul style="list-style-type: none"> <li>To be reasonable and treat everyone equitably in terms of remuneration, opportunities for advancement, regardless of their race, culture, religion and socio-economic status</li> <li>To understand that the success of the Company requires the commitment and best effort of everyone, thus, everyone must put their best foot forward and contribute equally to enjoy the fruits of labour.</li> </ul>
<b>Execute</b>	<ul style="list-style-type: none"> <li>To plan, perform and implement work, programmes and projects assigned diligently and expeditiously as instructed, to the best of one's abilities and to produce the desired result/(s) for the Company.</li> </ul>
<b>Wealthy</b>	<ul style="list-style-type: none"> <li>Amass a wealth of experience in terms of knowledge and skills, and form healthy relationships with colleagues, customers and the communities and, to use these acquired skills set and contacts well to contribute more to the company and be rewarded accordingly.</li> <li>These in turn, will raise one's socio-economic status and enable one to live a better life.</li> </ul>
<b>Attitude</b>	<ul style="list-style-type: none"> <li>Adopt a positive work attitude such as being responsible, cooperative, supportive, driven, team-oriented and being compliant with company regulations and policies.</li> </ul>
<b>Teamwork</b>	<ul style="list-style-type: none"> <li>Be united as a group and a single unit</li> <li>Everyone and every branch/department works towards achieving the common objectives of the Life Water Group instead of individually.</li> </ul>
<b>Efficient</b>	<ul style="list-style-type: none"> <li>Avoid wastefulness of time and resources. Working smart rather than hard, to achieve the desired results with less resources.</li> <li>Promoting recycling and repurposing of recyclables to avoid wasting resources which are environment-friendly initiatives.</li> <li>Maintain effective communication at all levels within the Group.</li> </ul>
<b>Respect</b>	<ul style="list-style-type: none"> <li>Promoting a harmonious coexistence and respecting the diverse culture, race, religion and socio-economic status of others</li> <li>Caring and protecting environmental health, promoting a sustainability culture</li> </ul>

## **PART II: CODE OF CONDUCT AND BUSINESS ETHICS**

### **Section A: Workplace Culture and Environment**

#### **3. NON-DISCRIMINATION AND FAIR TREATMENT**

Life Water upholds the principle of workforce diversity, equal opportunity, non-discrimination and fair treatment in all aspects of employment, including recruitment and hiring, compensation and benefits, working environments, career development and retirement.

#### **4. HEALTHY AND SAFE WORKPLACE**

Life Water is committed to provide a healthy and safe work environment to all employees to comply with health and safety requirements, policies and procedures set out by the Company.

### **Section B: Integrity and Diligence in Business Activities**

#### **5. STAKEHOLDERS TRUST AND RESPECT**

Life Water recognises the importance of welcoming to stakeholders' concerns and responding with integrity to improve performance and have a positive impact on society.

#### **6. ANTI-BRIBERY AND ANTI-CORRUPTION**

Life Water is committed to act professionally, fairly and with integrity in all business activities and relationships wherever it operates and in implementing and enforcing effective systems to counter bribery and corruption.

Employees shall not offer, give, solicit or accept any bribes in order to achieve any business or personal benefit that contravenes anti-bribery or anti-corruption laws.

#### **7. CONFLICT OF INTEREST**

Life Water recognises and respects the right of its employees to engage in outside financial activities as long as the activities are legal and do not impair, interfere or conflict with performance of their duties.

No employees shall have a direct or indirect financial or business interest in the business of any supplier or customer or shall accept any salary, fee, commission or other form of compensation or thing of value of the business partners of the Company unless receives approval from the Head of Department.

## **8. MONEY LAUNDERING**

Money laundering is a process of converting cash or property derived from criminal activities to give it a legitimate appearance. It is a process to clean “dirty” money in order to disguise its criminal origin.

All employees should always ensure that they are conducting business with reputable customers, for legitimate business purposes and with legitimate funds. Employees should report to the HOD if they suspect of any money laundering activities.

### **Section C: Company Information**

## **9. CONFIDENTIAL INFORMATION**

All information regarding the Company, its operations, financial condition and future prospects, should be regarded as material and price-sensitive, and must be treated as confidential unless it is already in the public domain.

Access to confidential information will be restricted to the employees and third parties, such as the Company’s auditors, bankers, lawyers or other professional advisors with legitimate need for such information to properly execute their duties, determined by their duties or obligations to the Company.

Employees are required to protect Life Water’s confidential information against unauthorized disclosure. Employees are also required to protect confidential information of third party which he/she has access to in the course of their responsibilities. Confidential information includes, but are not limited to data and technical know-how, business plan and budget, product design, customer list and information, information on current and future projects, and any other non-published data.

*This Code of Conduct and Business Ethics was approved and adopted by the Board on 22/12/2023.*