



TEAMSTAR BERHAD

REGISTRATION NO.: 202501005743 (1607157-X)

CODE OF CONDUCT & ETHICS

DEFINITIONS

For the purpose of this Code, the following definitions shall apply:

- “ABAC Policy”** : Teamstar Group’s Anti-Bribery and Anti-Corruption Policy & Procedures
- “ARMC”** : Audit Risk Management Committee of the Company
- “Business Associate”** : any persons who are providing products or performing services for or on behalf of Teamstar Group, apart from the Group’s employees, including contractors or subcontractors, distributors, business contacts, agents, advisers, joint venture partners, intermediaries, sales representatives, consultants, sponsors, service providers and business partners
- “Code”** : Code of Conduct & Ethics
- “Conflict of Interest”** : A situation where:
- (a) The interests of the Director/employee interfere, may potentially or appear to interfere, with the interests of the Group; or
 - (b) The Director/employee has interests that may make it difficult to perform his/her role objectively and effectively.
- Conflict of Interest arises in a situation where you are or may be in a position to take advantage of your role by using assets, confidential information, proprietary information or intellectual property for the benefit of yourself or a family member or closely related person.
- “Disciplinary Actions”** : Any action that can be taken on the completion of or during the investigation proceedings including but not limited to a warning, suspension from official duty, termination, dismissal or any such action as deemed fit considering the gravity of the matter
- “Director” or “Directors”** : Director(s) of the Group shall have the meaning given in the Companies Act 2016, Listing Requirements and Capital Markets and Services Act 2007
- “Improper Conduct”** : A breach of discipline or violation of applicable laws and regulatory, Code of Conduct and Ethics or the rules and regulations set out in any handbooks, policies and procedures statements or in any other documentations of Teamstar Group
- “Key Senior Management”** : Key senior management personnel comprising the Executive Directors and C-suite level of Teamstar Group
- “Listing Requirements”** : ACE Market Listing Requirements of Bursa Malaysia Securities Berhad, including any amendment that may be made from time to time
- “Personnel”** : Any person at all levels and grades including Directors, Key Senior Management, senior managers, managers, executives, officers,

non-executives, employees (whether permanent, full-time, part-time, contract, or temporary) employed by Teamstar Group including trainees, seconded staff, home-workers, casual workers and agency staff, volunteers, trainees, interns, protégé pupil, sponsors or any other persons associated with the Group

“Third-party Intermediaries”

: Any external individual or organisation that Teamstar Group has or plans to establish some form of business relationship. This includes actual and potential clients, customers, contractors, suppliers, distributors, business contacts, agents, advisers, joint ventures, joint venture partners, intermediaries, sales representatives or consultants and government and agencies and public bodies. This also includes, but is not limited to their advisors, representatives, public officials, politically exposed persons (PEPs) and political parties.

“WB Policy”

: Teamstar Group’s Whistleblowing Policy

“Wrongdoing”

: Action(s) or omission(s) that shall cause harm. Wrongdoing includes, but is not limited to the following:-

- (a) Bribery and corruption including money laundering, insider trading;
- (b) Fraud (misappropriation, embezzlement or theft) of the funds or assets of Teamstar Group, improprieties and irregularities in accounting and financial reporting, or blackmail;
- (c) Conflict of Interest, abuse of authority and discrimination, gross negligence and mismanagement;
- (d) Disregard or serious non-compliances with the policies and procedures, financial, legal or regulatory obligations of Teamstar Group;
- (e) Breach of law (national or international), Teamstar Group relevant code of conduct and policies such as fraud or deliberate error in documentation, bribery and corruption, criminal breach of trust, illegal or criminal offense;
- (f) Unauthorised disclosure or use of Teamstar Group’s confidential information including commercial or manufacturing secrets, calculations or designs;
- (g) Any unlawful act whether criminal or civil in nature;
- (h) Conduct, act or omission which is likely to create a substantial or specific danger to the health and safety of Personnel or other individuals or give rise to risk of damage to assets and properties;
- (i) All forms of harassment including but not confined to unwelcomed verbal or physical advances and sexually or otherwise derogatory or discriminatory statement or remark;
- (j) Acts, omissions or concealments of wrongdoing knowingly, willfully and intentionally which are detrimental to the interests or reputation of Teamstar Group;

Collaborating with a person(s) to commit any of the above wrongdoings

1.0 PURPOSE

- 1.1** The purpose of this Code is to establish a systematic guideline and guidance on ethical conduct for all employees, Personnel, Business Associates and Third-party Intermediaries of **TEAMSTAR BERHAD** (“**Teamstar**” or the “**Company**”) and its subsidiaries (collectively “**Teamstar Group**” or the “**Group**”) who provide or shall provide products and services and/or acting on behalf of the Group to create an ethical corporate environment
- 1.2** Teamstar Group is committed to promote and maintain the highest levels of governance, integrity, accountability and transparency in the conduct of its business activities, dealings, relationships and operations.

2.0 SCOPE

- 2.1** The scope of this Code applies to all Personnel of Teamstar Group, Business Associates and Third-party Intermediaries who provide or shall provide products and services and/or acting on behalf of Teamstar Group and extends to all internal and external multi-stakeholders and interested parties to embrace the spirit of our commitment to build a culture of high ethical standards.
- 2.2** This Code is not intended to be all-encompassing nor exhaustive and there can be other obligations or expectations of Directors and Key Senior Management on Personnel when performing their duties. Although this Code is not meant to address every issue, it defines the spirit in which the Teamstar Group conducts its business and serves as a guide to all Personnel in their daily conduct.
- 2.3** This Code is formulated to achieve the following objectives:-
- (a) To uphold the spirit of corporate and social responsibility in line with the legislation, regulations and guidelines for the administration of an organisation in Malaysia;
 - (b) To articulate the highest levels of governance, integrity, accountability, transparency and law-abiding behaviour within Teamstar Group;
 - (c) To improve self-discipline to provide good quality services;
 - (d) To ensure that all Personnel of Teamstar Group are aware of their ethical obligations; and
 - (e) To enhance the standard of corporate governance.
- 2.4** This Code applies in all countries, territories or jurisdictions in which Teamstar Group operates. Where local customs, standards, laws or other local policies are stricter than the provisions of this Code, the stricter rules shall be complied with. However, if this Code stipulates stricter rules than local customs, standards, laws or other local policies, the stricter provisions of this Code shall apply.

3.0 APPLICABLE FORMS

- 3.1 Appendix A:** Declaration that staff have read, understood and shall abide and comply with the information, guidelines and requirements of this Code.

4.0 RESPONSIBILITIES AND AUTHORITY

- 4.1** The Board of Directors and Key Senior Management are responsible for establishing, implementing and maintaining this Code that sets forth our values, expectations and standards of business conduct and ethics that serves as a guide for all Personnel of Teamstar Group.
- 4.2** This Code is in accordance with all applicable statutory laws and regulatory Requirements and it is the responsibility of the management of each department to ensure that all Personnel, Business Associates and Third-party Intermediaries of Teamstar Group are aware of this Code so as to maintain the highest levels of governance, integrity, accountability and transparency in the conduct of our business activities, dealings, relationships and operations of an ethical corporate environment.

5.0 IMPLEMENTATION GUIDELINES

- 5.1** The objective of this Code which sets forth the values, expectations and standards of business conduct and ethics to guide the Board of Directors, management, employees, and Personnel of Teamstar Group.
- 5.2** The Personnel shall maintain the highest standard of business conduct and ethical behaviour in the performance and exercise of responsibilities as Personnel of the Group or when otherwise representing the Group. The Personnel shall further conduct themselves in a manner that reflects the corporate values and overall spirit of this Code.
- 5.3** As the Personnel are placed in a position of trust, which includes overseeing and managing the Group's resources, having access to information, and making decisions (where applicable) that affect the interests of the Group, they are expected to be honest and impartial when carrying out their respective duties and responsibilities to maintain confidence in the Group and to advance the good name of the Group.
- 5.4** The Personnel have to avoid dealing with prospective Business Associates and Third-party Intermediaries known to be paying bribes or involved in any other forms of corruption. It is expected that our Business Associates and Third-party Intermediaries who provide or shall provide products and services and acting on behalf of the Group complies with this Code and the ABAC Policy when performing such work or services.
- 5.5** The Personnel shall always observe and ensure compliance with all applicable statutory laws and regulatory requirements to which they are bound to observe in the performance of their duties. The Personnel are also required to comply with the ethical and technical requirements of any relevant regulatory or professional body.
- 5.6** As a guide, any types of illegal, unethical, questionable practices, or Improper Conduct committed or about to be committed within Teamstar Group, include, but are not necessarily limited to, are identified as Wrongdoings.
- 5.7** The Code does not replace any existing policies, and you should continue to refer to whatever rules and standards have been set in your workplace. This Code aims to provide a framework for these policies and standards, so that it is easier for you to understand the rationale behind them.

6.0 CODE OF CONDUCT & ETHICS

- (a) The Code sets out the values, expectations and standards of business conduct and ethics which are founded on the principles of good corporate governance, integrity, accountability and transparency in all our actions and the conduct of our business and relationships.
- (b) The Personnel are expected to build upon, live out and be examples of the core values that drives our Group. We are therefore accountable to each other not to violate the Code, policies, laws and regulations. It is the responsibility of every Personnel to abide by the Code and policies. If any Personnel is found to have breached the Code and/or any compliance requirement of the Group, they shall be considered to have committed a serious disciplinary offence and shall face Disciplinary Actions.
- (c) The Code centers on these (3) sustainability pillars:
 - (i) **Environmental**: Fair workplace with health, safety, security and environment;
 - (ii) **Social**: Fair labour and employment practices; and
 - (iii) **Governance**: Fair business practices.

6.1 ENVIRONMENTAL SUSTAINABILITY – FAIR WORKPLACE WITH HEALTH, SAFETY, SECURITY AND ENVIRONMENT PRACTICES

(a) Fair Workplace

Teamstar Group is committed to cultivating a fair and inclusive workplace where all employees are treated with respect and without discrimination. The Group uphold the principles of equal opportunity, merit-based advancement and non-discriminatory practices regardless of race, religion, gender, age or background.

The Group promotes transparency, accountability, and ethical conduct at all levels and is dedicated to building a culture that values diversity, fosters trust, and encourages open communication. This commitment is essential not only for employee well-being but also for long-term organisational sustainability and social responsibility.

(b) Environmental Stewardship

Teamstar Group is committed to play its role in building a more sustainable society and respect for the environment. Teamstar Group aims to align its practices with relevant environmental standards, recognised frameworks and/or voluntary initiatives, where applicable, subject to regulatory requirements and operational feasibility.

The Group seeks to minimise its environmental impact and carbon footprint by conserving resources and protecting our planet, while ensuring compliance with the Environmental Quality Act 1974. Every Personnel has a role to play in that everyone has a responsibility to minimise their impact on mother earth wherever possible.

6.2 SOCIAL SUSTAINABILITY - FAIR LABOUR, EMPLOYMENT PRACTICES AND OUR COMMUNITY

(a) Inclusive and Equal Employment Opportunity

Teamstar Group is committed to recruiting, hiring, training, promoting and otherwise treating all applicants, employees and Personnel without discrimination. The Group strives to promote diversity and embraces a culture of inclusivity that is conducive for all Personnel to contribute their unique talents and skills to produce the best product and services for our customers and clients.

(b) No Forced Labour and Child Labour

Teamstar Group strictly prohibits the use of any form of forced or involuntary labour where people are forced to work against their will, including forced labour to work off a debt, prison labour or human trafficking. The Group adopts sound labour and employment practices and endeavours to ensure the Personnel are treated in accordance with the applicable laws and regulations of the countries and regions in which the Group operates. The Group shall also not condone working with Business Associates who practices forced labour or child labour.

(c) Harassment and Discrimination

Teamstar Group is committed to maintain a workplace that is free of harassment and discrimination, recognising and respecting each person's right to human dignity. The Group does not condone any behaviour or action likely to infringe upon this right in particular any form of harassment, bullying and discrimination.

(d) Contribution to Our Community

Teamstar Group, as a responsible stakeholder in society, a good neighbour and an empathetic corporate citizen with strong governance, is committed to support the communities where our Personnel live and work and the communities where we conduct our business.

We encourage our Personnel to play an active role in the community while the Group also explore ways to contribute to the betterment of our society and work towards addressing broader societal challenges.

6.3 GOVERNANCE SUSTAINABILITY - FAIR BUSINESS PRACTICES

(a) Fair Competition

Teamstar Group is committed to working in an industry where business practices are healthy, fair and reputable. The Group respects all stakeholders in our professional sphere including our competitors.

(b) Insider Trading

Teamstar Group does not restrict the freedom of Personnel to make appropriate personal investments. However, each of us must always bear in mind the rules on "insider trading". We must never use or disclose material, non-public information about the Group for the purpose of buying or selling securities.

(c) Honesty Advertising

Teamstar Group values and is committed to accuracy and transparency in its advertisements and promotions.

(d) Anti-Money Laundering

Teamstar Group is committed to anti-money laundering governance and is vigilant in the prevention against money laundering and terrorist activities. The Group adopts a risk-based approach, conducting due diligence and providing timely disclosure of suspicious transactions to the relevant law enforcement agencies through the Group's Anti-Bribery and Anti-Corruption Policy.

(e) Tax and Trade Controls

As a good corporate citizen, Teamstar Group seeks to comply with applicable tax and trade control laws and regulations wherever it operates. The Group shall respect tax laws, trade control laws and regulations which prohibit or restrict sales or other transactions involving certain products, services, software and technologies to certain countries, individuals or entities to secure international peace and security.

(f) Bribery and Facilitation Payments

Teamstar Group's ABAC Policy spells out our commitment to promote and maintain the highest levels of governance, integrity, accountability and transparency in all our business activities, dealings, relationships and operations. The Group shall not offer or accept any form of payment or incentive intended to improperly influence a business decision.

(g) Gifts and Hospitality

Teamstar Group adopts the practise of giving and receiving business gifts and hospitality that contribute towards building understanding and improving work relationships. Cognizant that the culture of gifts and hospitality vary across companies, countries, regions, cultures and religions, the Group expects all Personnel to familiarise and comply with its ABAC Policy when receiving or giving gifts and hospitality.

(h) Charitable Donations

Teamstar Group in its role as a good corporate citizen, regularly undertakes social and philanthropic programmes that are in line with our business objectives and strategies or those programmes that will benefit the broader interests of the community as a whole, while complementing the efforts of the industry and Government. The Group also encourages its Personnel to actively contribute in cash or in-kind towards charitable organisations.

(i) Political Participation, Contributions and Lobbying

The Group has a policy of strict political neutrality and as stated in our ABAC Policy, TEAMSTAR does not make political donations or contributions to any political parties, organisations or individuals engaged in politics nor does it incur any political expenditure.

Nonetheless, the Group respects the right of its Personnel to participate as individuals in the political process provided they make it clear that they do not represent the Group in such political activities.

However, Teamstar Group believes it is our duty and responsibility to be proactive and to contribute and partake in the public decision-making process in the countries in which it operates for its betterment and improvement of the industry.

(j) Conflict of Interest

Teamstar Group is committed to always act in the best interests of the Group rather than for personal gain. The Group aims to avoid situations where our personal interests might come into conflict with the interests of the Teamstar Group as guided by our Conflict of Interest Policy.

In a Conflict of Interest situation, a full disclosure of all the facts is essential and the Directors shall be governed by the Companies Act 2016 and Listing Requirements on matters relating to the disclosure of such Conflict of Interest.

(k) Fraud, Breach of Trust and Abuse of Power

Teamstar Group is committed to promote and adhere to our core values of governance, integrity, accountability and transparency in all our business activities, dealings, relationships and operations.

The Group shall ensure that all Personnel are aware through this Code and our other related policies on the following:

- (i) Personnel are not to engage in any transaction involving dishonesty and fraud;
- (ii) Personnel are not to engage in a behaviour that constitutes a breach of our trust and confidence in them; and
- (iii) Personnel are not to abuse their authority or power for personal gain or interest, or for any special or preferential treatment.

(l) Fair Purchasing

Teamstar Group is committed to practicing fairness, meritocracy and objectivity in the selection of our business partners and associates to ensure the best value for the Group for the long-term success and sustainability of our business.

The Group is proud of its reputation for dealing with Business Associates in a mutually supportive and transparent manner based on the principles of impartiality, fairness and loyalty without any preferential treatment.

(m) Cybersecurity Protection of Personal and Company Devices

Teamstar Group is committed to protect and keep the data and records of the Group safe and reliable. The Group shall employ various IT tools, methodologies and processes to reduce the likelihood of security breaches or data contamination and to proactively manage, protect and safeguard the integrity of our systems and databases as set out in our Data Protection Policy.

Among the safeguard measures in place are the prohibition of using personal storage device by staff, prohibition from downloading or opening files from personal or unknown sources, etc.

(n) Privacy, Data Protection, and Confidential or Proprietary Property

Teamstar Group respects the privacy and confidentiality of personal information of all our stakeholders, including our Personnel, Business Associates and Third-party Intermediaries. The Group shall put in place the required precautionary measures such as our Data Protection Policy to ensure the protection of all data and information from unauthorised disclosure. Confidential or proprietary information includes all information that is not generally known to the public and is valuable to us, our stakeholders or which would be helpful to our competitors.

7.0 MONITORING AND FAILURE TO COMPLY

- 7.1** It is the responsibility of the Personnel to ensure full compliance with all the provisions of this Code and where necessary, to seek guidance from their respective superior, line manager, Head of Department or the Compliance Officer.
- 7.2** Any Personnel shall notify his or her superior, line manager or Head of Department as soon as possible if he or she has reasonable grounds to believe or suspects that a breach of this Code has occurred or is suspected to have occurred. The Personnel can raise his or her concerns in accordance with the WB Policy.
- 7.3** The whistleblower can speak-up or report in good faith any illegal, unethical, questionable practices, wrongdoings or Improper Conduct committed or is about to be committed within Teamstar Group, without fear of being subjected to detrimental conduct including reprisal and/or retaliation.
- 7.4** Directors and/or Key Senior Management shall immediately report any concern about breaches or possible breaches of this Code by any Personnel to the Chairman of the ARMC or any of the Independent Directors of the Group, where applicable, in accordance with the WB Policy.
- 7.5** In the event of any breaches of this Code by any Director, the other Board members shall determine the appropriate action to be taken after considering all relevant information and circumstances.
- 7.6** When in doubt, the Personnel shall be guided by the principles stated herein and the WB Policy. Failure to comply with this Code can result in Disciplinary Actions, including the possibility of dismissal and, if warranted, legal proceedings or criminal sanctions.

8.0 COMPLIANCE TO THE LAW

- 8.1** Teamstar Group shall comply with all applicable statutory laws, rules and regulatory requirements of the governments, commissions, and exchanges in jurisdictions within which the Group operates.
- 8.2** Teamstar Group reserves its right to report any actions or activities suspected of being criminal in nature to the government agencies, anti-corruption agency, police or other relevant authorities.

9.0 REVIEW OF THIS CODE

- 9.1** The Board of Directors and Key Senior Management of Teamstar Group shall monitor the implementation of this Code and review it periodically to ensure that it continues to remain relevant and appropriate for its suitability, effectiveness and efficiency in keeping with the changing business environment, administrative or operational needs of Teamstar Group as well as changes to statutory laws and regulatory requirements.

This Code was adopted by the Board on 20 February 2026 and is made available on the Group's website at <https://teamstarberhad.com/>.

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APPENDIX A

DECLARATION BY STAFF THAT THEY HAVE READ, UNDERSTOOD AND SHALL ABIDE AND COMPLY WITH THE INFORMATION, GUIDELINES AND REQUIREMENTS OF THE CODE OF CONDUCT & ETHICS

I, the undersigned, hereby certify and declare that I have read and understood the Code of Conduct & Ethics of **TEAMSTAR BERHAD**.

I agree that any business decisions and actions that I am dealing with, shall be based on the best interest of the organisation I am representing, and shall not be motivated by personal interests, considerations or relationships.

My relationships with prospective or existing customers, Business Associates and Third-party Intermediaries shall not affect my independent and sound judgment acting on behalf of the organisation.

I am aware of the Code of Conduct & Ethics of **TEAMSTAR BERHAD** covering three (3) sustainability pillars namely (a) Fair Workplace with Health, Safety, Security and Environment Practices (Environmental); (b) Fair Labour and Employment Practices (Social) and (c) Fair Business Practices (Governance), and I have not violated these practices.

I also acknowledge and understand that any failure by me to comply with the Code of Conduct & Ethics may result in Disciplinary Actions taken against me, including but not limited to withholding of bonuses, increments and merits awards, denial of promotion and termination of my employment or dismissal for gross misconduct, or termination of contractual agreement.

Signature : _____
Name : _____
Employee ID : _____
Name of Company : _____
Designation : _____