

**1 DOC INTERNATIONAL BERHAD
CODE OF CONDUCT AND BUSINESS ETHICS**

1.0 PURPOSE AND SCOPE

1 Doc International Berhad (“**1 Doc**” or “**the Group**”) and its subsidiaries, is committed to maintaining a high standard of code of conduct and business ethics. The value of integrity is the cornerstone of this Code of Conduct and Ethics (“**Code**”).

This Code sets out the principles to guide standards of professional behaviour and business conduct when employees deal with a third party. In this context, third party refers to any individual or organisation the directors and employee comes into contact with during the course of his/her work, and includes actual and potential customers, competitors, suppliers, contractors, distributors, business contacts/partners, agents, advisers, regulators, government and public bodies and officials, shareholders, investors, the environment and the community in which 1 Doc operates in.

This Code applies to all directors and employees within 1 Doc.

2.0 RESPONSIBILITY AND COMPLIANCE WITH THE CODE

It is the responsibility of every employee to act in accordance with the policies, principles and guidelines detailed in this Code, and any update or amendment which may be issued from time to time by the Group. It is also the Employees’ responsibility to support the implementation of this Code.

Any violation or suspected violation of this Code shall be reported to the Chairman of the Board (in the case of any Director) or 1 Doc’s Human Resource Department or such other officer designated by 1 Doc from time to time.

Non-compliance with this Code will be treated seriously and may result in disciplinary action, including the possibility of suspension or dismissal, and if warranted, legal proceedings against the employees. Violation of applicable laws may subject employees to civil and/or criminal penalties imposed by a governmental agency or a court, in addition to disciplinary acti

3.0 WORKSPACE HEALTH AND SAFETY

The Group is committed to providing a safe and healthy work environment to all employees. Health and safety support and training will be provided to employees so that they understand their occupational health and safety obligations and diligently comply with all health and safety requirements, policies and procedures set out by the Group. Safety is everyone's responsibility.

The Group takes appropriate precautions to prevent injuries or adverse working conditions for each and every Employee. Employees are responsible for reporting injuries and unsafe work practices or conditions as soon as they are being discovered or become known.

4.0 HARRASSMENT, THREAT AND VIOLENCE

1 Doc supports and respects human rights and seeks to provide a work environment where employees are treated with respect and free from any form of harassment, threat, intimidation, violence or any other inappropriate behaviour.

The Group views sexual harassment as a serious offence and appropriate action will be taken against any Employee found guilty of committing the offence.

Employees are responsible to report any harassment, intimidation, offensive or inappropriate behaviour to 1 Doc Human Resource Department. All complaints or grievances will be investigated, and appropriate action will be taken to stop such conduct and prevent future occurrences.

5.0 DRUGS, ALCOHOL AND PROHIBITED SUBSTANCES

Employees are expected to perform their job duties free from the influence of any substance that could impair job performance or pose unacceptable safety risk to the employees or others. The Group therefore prohibits working under the influence of alcohol, illegal drugs or controlled substances. In addition, the use, possession, distribution or sale of alcohol, illegal drugs or other controlled substances in the workplace (other than for approved medicinal purposes) is strictly prohibited.

There may be company-sponsored events or functions where the serving of alcoholic beverages is permitted. In these cases, all appropriate liquor laws must be followed.

6.0 USE AND CONTROL OF INFORMATION

Employees will use its IT resources effectively and efficiently to collect, store, control, use, protect and dispose of management, technological, personal and other useful information so that it can be properly and effectively used without jeopardizing confidentiality.

Recognising the importance of protecting personal information, employees will gather, store, control, use, process and dispose of personal information appropriately in compliance with relevant laws and regulations. Employees will also seek to prevent the loss, falsification, or leakage of such information.

7.0 PROTECTION AND USE OF COMPANY ASSETS AND RESOURCES

The Group's properties and assets should be managed and safeguarded in a manner which protects their values. 1 Doc provides its employees a variety of resources and assets including licensed software for employees to deliver their work.

Employees shall safeguard and make proper and efficient use of the assets and resources in compliance with all applicable laws, company policies and licensing agreements, and take all necessary steps to prevent loss, damage, misuse, theft, fraud or destruction of 1 Doc's assets and resources.

8.0 PROPRIETARY AND CONFIDENTIAL INFORMATION

Employees are required to protect 1 Doc's confidential information and guard them against unauthorised disclosure or use. Employees are also required to protect confidential information of third party which employees have access to in the course of their work.

Unless required by law or authorised by 1 Doc, employees shall not make any unauthorized public statement, circulate, divulge or communicate with any customer, member of the public, media or government or statutory bodies on the policies or decision of the Group on any issue. This applies to disclosures by any medium, including the internet, especially via social media sites (e.g. Facebook, Twitter, YouTube), internet message boards and/ or blogs.

Employees and Shareholder, Directors are strictly prohibited from disclosing their remuneration details to colleagues or unauthorized parties.

9.0 CONFLICT OF INTEREST

Employees have an obligation to act in the best interest of 1 Doc and are expected to give their fullest attention, dedication and efforts to their duties and the Group at all times. Employees are prohibited from using their position or knowledge gained directly or indirectly in the course of their duties and responsibilities or employment for private or personal advantage.

Employees with a conflict of interest situation should declare and seek advice from Management before engaging in any activity and transaction.

10.0 ANTI-BRIBERY AND CORRUPTION POLICY

Under no circumstances are employees permitted to engage in bribery or corruption as part of the Groups' operations. They shall not offer or provide gifts, payments, or any benefits, either directly or indirectly, with the intent to gain an improper business advantage from public officials or external parties on behalf of the Group.

In addition, employees must not seek, offer, or accept bribes or graft for personal gain or on behalf of their relatives to influence their actions in relation to the Group's affairs

Prior to giving or accepting any gifts (in whatever form or value), Employees shall assess the appropriateness of their actions by assessing if the action could influence or could reasonably give the appearance of influencing the business relationship of The Group with that organization or individual or any business decision arising out of that business relationship.

11.0 INSIDER TRADING

Employees who are in possession of market sensitive information of The Group or other listed company gained in the course of employment with The Group are not allowed to trade in securities of The Group or any securities of another listed company if that information has not been made public. Employees are also prohibited from disclosing any non-public price sensitive information to any person (including family members) where such information may be used by such person to his or her profit by trading or in recommending or advising others to trade in any securities of company.

12.0 COMPLIANCE WITH LAWS

1 Doc is committed to doing business the right way, by acting ethically and consistently with this Code, its policies and all applicable laws, rules and regulations. Employees have a continuing obligation to familiarise themselves with applicable laws relating to their job responsibilities and 1 Doc policies.

13.0 ABUSE OF POWER

The abuse of authority/power is the improper use of a position of influence, power or authority by an individual towards others. Abuse of authority can include a one-time incident or a series of incidents.

Everyone in the Group should be treated with dignity and abuse of power and any form discrimination are strictly not tolerated. Employee shall report incidents of abusing of power, or has reason to believe abusing of power is occurring, to their immediate superior or adhere to the Whistleblowing Policy and Procedures.

14.0 COMPLIANCE

The Director and employees shall always observe and ensure compliance with all applicable laws, rules and regulations to which they are bound to observe in the performance of their duties. They also required to comply with the ethical and technical requirement of any relevant regulatory or professional body.

15.0 REPORTING VIOLATIONS

Employees are encouraged to report any violations of this Code or concerns about abuse of power or non-compliance. The Group Whistleblowing Policy and Procedures sets out procedures which enables employees to raise genuine concerns regarding actual or suspected unethical, unlawful, illegal, wrongful or other improper conduct and also sets out the process for managing any action, intimidation or harassment against a whistle blower.

16.0 PERIODIC REVIEW

This Code should be reviewed periodically by the Board in accordance with the needs of The Group and be communicated to all levels of officers on the new changes. This Code is available on The Group's website.

This Code of Conduct and Ethics has been reviewed by the Board on XX XXX 2025.