

Code of Conduct

TABLE OF CONTENTS

PART I: OVERVIEW

- 1.0 Purpose and Scope of the Code
- 2.0 Responsibility and Compliance with the Code
- 3.0 Amendments to the Code

PART II: CODE OF CONDUCT

SECTION A: WORKPLACE CULTURE AND ENVIRONMENT

- 4.0 Equal Opportunity and Non-discrimination
- 5.0 Workplace Health and Safety
- 6.0 Harassment, Threat and Violence
- 7.0 Drugs, Alcohol and Prohibited Substances

SECTION B: COMPANY INFORMATION, RECORDS AND ASSETS

- 8.0 Data Integrity and Data Protection
- 9.0 Protection and Use of Company Assets and Resources
- 10.0 Records and Reporting
- 11.0 Proprietary and Confidential Information

SECTION C: DUTIES OF GOOD FAITH, DILIGENCE AND INTEGRITY

- 12.0 Conflict of Interest
- 13.0 Accepting & Providing Gifts and other Benefits
- 14.0 Bribery and Corruption
- 15.0 Money Laundering
- 16.0 Compliance with Laws
- 17.0 Whistleblower

Code of Conduct

PART I: OVERVIEW

1.0 Purpose and Scope of the Code

This Code of Conduct and Ethics (“Code”) applies to all employees and directors of INTI Universal Holdings Sdn Bhd (the “Company”) and its subsidiaries (collectively, “INTI University & Colleges”), including full-time or permanent employees, part-time employees, employees on probation, trainees and interns, employees on secondment and personnel on fixed-term contracts (collectively, “Employees”). This Code sets out the principles to guide standards of behavior and business conduct when Employees deal with third party. In this context, third party refers to any individual or organization the 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 and the community in which INTI University & Colleges operates in. This Code is not a comprehensive guide that covers every ethical situation Employees may encounter in their course of work. In any circumstance which is not covered by this Code or in case of any doubt, Employees shall refer to his or her Head of Department or the Company’s Head of Human Resources Department for clarification or guidance.

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 Company. It is also the Employee’s responsibility to report violations or suspected violations of this Code and support the implementation of this Code. Any violation or suspected violation of this Code shall be reported to the CEO of the Company (in the case of any Director/ Head of Human Resources Department/Legal Counsel) or the Company’s Head of Human Resources Department and/or Company’s Legal Counsel (in all other cases) or such other officer designated by the Company 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 Employee. Violation of applicable laws may subject Employee to civil and/or criminal penalties imposed by a governmental agency or a court, in addition to disciplinary action. This Code is to be read and applied in conjunction with all other related or applicable policies, procedures and guidelines of INTI.

3.0 Amendments to the Code

Updates or amendments to this Code may be made from time to time to be in line with any change in applicable laws and regulations, or changes to the Company’s vision and

Code of Conduct

mission or other relevant factors. Employees will be informed of any update or amendment to the Code.

Code of Conduct

PART II: CODE OF CONDUCT

SECTION A: WORKPLACE CULTURE AND ENVIRONMENT

4.0 Equal Opportunity and Non-discrimination

INTI upholds the principle of diversity of workforce, equal opportunity, non-discrimination and fair treatment in all aspects of employment, including recruitment and hiring, compensation and benefits, working conditions, training, rewards and recognition, career development and retirement. Employees must strive to create a workplace where everyone is treated fairly and equally.

5.0 Workplace Health and Safety

INTI 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 Company. Safety is everyone's responsibility.

6.0 Harassment, Threat and Violence

INTI 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 behavior. Employees are responsible to report any harassment, intimidation, offensive or inappropriate behavior. All complaints or grievances will be investigated and appropriate action will be taken to stop such conduct and prevent future occurrences.

7.0 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 Employee or others. INTI 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.

Code of Conduct

SECTION B: COMPANY INFORMATION, RECORDS AND ASSETS

8.0 Data Integrity and Data Protection

Employees shall record, manage, store and transfer all data and records in compliance with applicable legal, tax, regulatory and accounting requirements.

9.0 Protection and Use of Company Assets and Resources

INTI 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 INTI assets and resources.

10.0 Records and Reporting

INTI has put in place our INTI Privacy Policy which sets out the time period to retain and destroy data and records for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you are a student and/or employees of ours);
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

11.0 Proprietary and Confidential Information

Employees are required to protect INTI's confidential information and guard them against unauthorized 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. 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 work processes, and any non-published financial or other data. Unless required by law or authorized by the Company, Employees shall not disclose confidential information or allow such disclosure or use confidential information for unauthorized purposes. This obligation continues beyond the termination of employment.

Code of Conduct

SECTION C: DUTIES OF GOOD FAITH, DILIGENCE AND INTEGRITY

12.0 Conflict of Interest

Employees have an obligation to act in the best interest of INTI 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. If Employee at any time thinks that he or she may have a potential or actual conflict of interest, Employee is obliged to disclose the conflict promptly to the Legal Counsel or the Company's Head of Human Resources Department or Employee's Head of Department so that a determination can be made as to the existence and seriousness of an actual conflict. When in doubt, Employees shall adopt the highest standard of conduct.

13.0 Accepting & Providing Gifts and other Benefits

As a general rule, Employees are discouraged from giving or accepting gifts, entertainment or other benefits to or from business partners. Notwithstanding this, INTI recognizes that the occasional acceptance or offer of modest gifts and entertainment may be a legitimate custom or practice in business relationships. The following guidelines shall be observed:

- Employees should not give or accept gifts or any other benefit or privilege that would in any way influence or appear to influence any business decision or gain an unfair advantage.
- The situation in which the gifts, entertainment and other benefits is received or given should not be connected with contractual negotiations, tender awards or similar circumstances.

14.0 Bribery and Corruption

INTI is committed to acting professionally, fairly and with integrity in all its business dealings 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 advantage for themselves or others or engage in any transaction that contravene any applicable anti-bribery or anti-corruption laws.

15.0 Money Laundering

Money laundering is the process of concealing or disguising the identity of illegally obtained proceeds so that they appear to have originated from legitimate sources. Employees should always ensure that they are conducting business with reputable customers, for legitimate business purposes and with legitimate funds. Employees need

Code of Conduct

to be mindful of the risk of INTI's business being used for money laundering activities and if they suspect money laundering activities, they should report it to their respective Head of Department or the relevant person designated by the Company.

16.0 Compliance with Laws

INTI is committed to compliance with all laws applicable to its operations. Under certain circumstances, applicable law may establish requirements that differ from this Code. If there is a conflict between the law and this Code, we must comply with the law. If the Code is more restrictive, we should follow the Code. Our institutions also may impose requirements regarding our conduct through other internal policies. If there is a conflict between other internal policies and the Code, we should follow the more restrictive rule. If we are uncertain, we should consult our Local Compliance Officer. Employees have a continuing obligation to familiarize themselves with applicable laws relating to their job responsibilities and INTI policies.

17.0 Whistleblower

INTI has put in place a Group-wide Whistleblower Policy to uphold the highest standards of professionalism, integrity and ethical behavior in the conduct of its business and operations. The policy sets out procedures which enables Employees and members of the public 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 whistleblower. INTI has also created an IntiEthics Platform (<https://intiethics.newinti.edu.my>) to allow any individual who wished to whistle blow/disclose any inappropriate misconduct involving INTI's employees (irrespective of nature of employment status), and any other stakeholders/persons providing services to the institution, including consultants, vendors, independent contractors, external agencies and/or any other party with a business relationship with INTI.