

KAF INVESTMENT FUNDS BERHAD ("KIFB") CODE OF ETHICS AND PROFESSIONAL CONDUCT

KAF Investment Funds Bhd ("KIFB"), a part of KAF Group, promotes and demands the highest ethical conduct in all of its business activities. KAF Group's "Code of Ethics and Professional Conduct" (the Code) sets the minimum standards for ethical behavior that all employees are expected to follow in their interactions with clients, business partners, regulators, and each other.

This Code serves as a guide for sound and prudent business practices. While it does not cover every situation, all employees are expected to act honestly, responsibly, and with integrity at all times, guided by the spirit of the Code's provisions.

A. Code of Ethics

All directors and employees shall abide by the following ethical principles, which are essential for achieving a high standard of professionalism across KAF Group.

Principle 1: Competence

All directors and employees must develop and maintain the knowledge, skills, and behaviour necessary to act professionally and proficiently. This includes acting with diligence and regularly updating their qualifications and expertise.

Principle 2: Integrity

All directors and employees must be honest and open in their dealings. They must behave accountably and in a trustworthy manner, avoiding any actions that could damage the industry's reputation.

Principle 3: Fairness

All directors and employees shall act responsibly and embrace a culture of fairness and transparency. This involves treating professional relationships with respect and considering the impact of their decisions on all stakeholders.

Principle 4: Confidentiality

All directors and employees must protect the confidentiality of information provided to them and use it only for its intended purpose. Information should not be divulged to unauthorized persons without consent, unless required by law or regulation.

Principle 5: Objectivity:

All directors and employees must not allow conflicts of interest, bias, or undue influence to override their professional judgment. They are required to declare any matters that could impair their objectivity to those concerned.

B. Code of Professional Conduct

All employees are responsible for upholding the principles of the Code of Professional Conduct in their daily business activities.

Conflicts of Interest

Employees must not engage in any business activity that competes or conflicts with the KIFB's interests. This includes disclosing any financial interest in a client, seeking written approval for outside employment, and refraining from accepting costly gifts or entertainment.

Misuse of Position

Directors, employees, and their relatives must not use their connection with the KIFB for personal advantage or to obtain preferential treatment.

Confidentiality

The confidentiality of relations and dealings between the KIFB and its clients is paramount. Employees must protect client information and transactions and are prohibited from using this information for personal gain, even after their employment has ended.

Chinese Walls Policy and Procedures

The KIFB has established policies and physical arrangements to prevent the improper spread of market-sensitive information. Employees in "insider areas" are prohibited from sharing confidential or insider information with those in "public areas".

Personal Account & Insider Dealings

Employees are required to periodically declare their personal account dealings and securities holdings. They are prohibited from dealing in securities when in possession of non-public, price-sensitive information, or from "tipping" others with such information.

Adherence to Laws and Regulations

All employees are required to comply with applicable laws and regulations in the jurisdiction where they operate. The KIFB has a zero-tolerance policy for corruption and bribery and does not engage with external parties involved in illegal activities.

Non-Compliance and Whistleblowing

Any violation of the Code's principles by an employee, agent, or third party will result in disciplinary action.

It is the responsibility of all directors, officers, and employees to report legitimate concerns about violations or misconduct through the designated whistleblowing channels. Reports can be made confidentially or anonymously, and prohibits retaliation against any employee who reports a suspected violation in good faith.