

CME GROUP BERHAD

CODE OF ETHICS AND CONDUCT

Introduction

This Code of Ethics and Conduct ("**the Code**") sets out the principles, values and standards of business ethics and conduct to guide the Board of Directors ("**the Board**"), the management and employees of CME Group Bhd ("**CME**") and its subsidiaries ("**CME Group**").

This Code is not a comprehensive guide that covers every ethical situation Employees and Directors when performing their duties but it provide a minimum standard of conduct in which the board and the employees of CME in their daily conduct.

Where there are doubts over matters relating to the Code, employees are to seek guidance from their respective Heads of Subsidiaries, Heads of Division or Heads of Department, who may if necessary, seek guidance from the senior management.

Code of Conduct

(1) Equal Opportunity and Non-discrimination

CME Group 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.

(2) Anti-Harassment

CME Group is committed 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. Employees can report any harassment, intimidation, offensive or inappropriate behaviour. All complaints or grievances will be investigated and appropriate action will be taken to stop such conduct and prevent future occurrences.

(3) Workplace Health and Safety

In Line with CME Group's commitment to Health, Safety and the Environment (HSE), and in compliance with its HSE Policy, we are committed to ensure the safety of all employees and we shall provide 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.

(4) Drugs, Alcohol and Prohibited Substances

CME Group is committed to maintain a healthy, effective and safety conscious work culture. To achieve this aspiration, CME prohibits the consumption and possession of alcohol at all work locations. CME also encourage employees who are alcohol dependent to come forward for company assistance in treatment and rehabilitation. CME would take disciplinary action, including termination of employment, on any employee who violates this policy.

(5) Conflict of Interest

Employee have an obligation to act in the best interest of CME Group at all times. An employee must not place himself in a position where his duty and his interest conflict. He must not engage in any business transactions, directly or indirectly, with the Group without the knowledge and proper approval of the directors. If an employee at any time thinks that he or she may have a potential or actual conflict of interest, he must declare the nature of his interests to the Company as and when it arises.

(6) Data Protection /Protection of Privacy

An employee is expected not to disclose personal information obtained in the workplace or business operation to others without the consent of the company, unless required by law. All files, records, documents, drawings, specifications, equipment and similar items relating to the business of the Company, and all copies of reproduction thereof, whether prepared by him or otherwise coming into his possession, shall not be removed from the premises of the Company upon the expiration or termination of the employment term. Employees shall record, manage, store and transfer all data and records in compliance with applicable legal, tax, regulatory and accounting requirements.

(7) Protection of Company Assets and Resources

Employees shall endeavor to protect and make proper use of the assets and resources belonging to the Group in compliance with all applicable laws, company policies and licensing agreements. Employees should not use such assets or resources for his personal gain or the benefits of others and shall take all necessary steps to prevent loss, damage and misuse of CME Group assets and resources.

(8) Insider Trading

Employees who are in possession of market sensitive information are not allowed to trade in securities of the Company or 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 third party.

(9) Anti Bribery and Corruption

CME Group are committed to uphold the highest standards of integrity in all business transactions and practices a zero-tolerance approach towards all forms of bribery and corruption, and upholds all applicable laws including all anti-corruption laws, regulations and guidelines.

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

(10) Whistleblower

CME Group recognizes the important of formalizing a Whistleblowing Policy and Procedures to provide an avenue for all employees of the Group or external party to raise concerns about any improper conduct within the Group.

The objective of the Whistleblowing Policy and Procedures is to ensure that whistleblower, through understanding the Whistleblowing Policy and Procedures, will come forward to express his or her concerns about a (suspected) malpractice, without fear of punishment or unfair treatment

(11) Competition with the Group

An employee must not obtain for himself or for his spouse any property or business advantage that belongs to the Group or for which he has been negotiating. It is a breach of duty for an employee or his spouse to set up a competing firm or allowing his spouse to work for a competing firm to take advantage of contracts that should have gone to the Group of which he is an employee.

This Code of Conduct was adopted by the Board on