

EASTLAND EQUITY BHD

CORPORATE CODE OF CONDUCT AND ETHICS

1.0 OBJECTIVE

This code is drawn up to:

- i. Communicate and provide guidance to stakeholders on the ethical behaviors and values expected from the Group; and
- ii. Measure and monitor management performance against these values.

2.0 THE PRINCIPLES OF THE CODE

We are responsible to:

- i. Our Customers, products and services must be of quality, produced and delivered in ethical manner. Promotions and advertisements must be true to the actual offering.
- ii. Our Contractors, business associate and partners, subject to their adherence to the universal principles of code of ethics, by allowing them to make a fair profit.
- iii. Our Employees, by creating safe, healthy and secured working environment free from any form of danger and sexual harassment. Merit and performance shall be duly recognized and be rewarded with fair remuneration and career advancement opportunity.
- iv. Our Communities, by embracing social equity and diversity, comply with regulatory requirements and support good causes and charities.
- v. Our Environment, by preserving and protecting the environment and natural resources in the course of conducting business to ensure sustainability.
- vi. Our Shareholders, by upholding our code of ethics in conducting our business and creating wealth and rewarding them.
- vii. Our Stakeholders, by not accepting and giving any favors, rewards and benefits with an intention to corrupt or bribe for improper gain or advantage.

Complementing these general principles, the Group further defines the following specific provisions with respect to insider trading, money laundering, corruption, conflicts of interest and abuse of power. No Directors, Officers or staff shall:

EASTLAND EQUITY BHD

CORPORATE CODE OF CONDUCT AND ETHICS

- (a) Enter into any transaction in the securities while they are in possession of non-public information about that Company or recommend others to transact in the securities of the Company on the basis of insider information;
- (b) Assist money laundering activities which may include, but not limited to accepting payment in large and unusual amount of cash; or payments made by or to third parties who are not parties to the contract; or payments made in currencies differ from invoices;
- (c) Solicit gifts or favours in connection with their official duties; or accepting gifts which would create or give rise to perception of impropriety or biasness that would damage the reputation of the Group;
- (d) Provide gifts, bribes or benefits to influence other stakeholders in order to obtain or retain business or secure an unfair advantage in any business transaction or any such offences as stipulated in the company's Anti Bribery and Corruption Policy;
- (e) Take part in deciding any transaction, contract or proposed contract or arrangement in which he/she is interested, directly or indirectly; and
- (f) Abuse its power by imposing his/her will over a subordinate, through the exercising of the power conferred to his/her position for gaining benefits or particular objective that is usually in violation of laws, rules and regulations.

3.0 BOARD'S RESPONSIBILITIES

The Board shall:

- a. Set a good example in practicing the provisions in this Code;
- b. Commit to and ensure the implementation of appropriate internal systems to support, promote and strengthen the awareness and compliance to this Code;
- c. Ensure implementation of appropriate communication channel to receive feedbacks from parties involved;
- d. Integrate this Code into management decisions, practices and procedures; and
- e. Measure and monitor management performance against these values.

EASTLAND EQUITY BHD

CORPORATE CODE OF CONDUCT AND ETHICS

4.0 MANAGEMENT'S RESPONSIBILITY

Management should ensure this Code is readily available to all employees and the importance and relevance of this Code to their work shall be clearly communicated to them.

In making operational and business decision, the management is responsible to the Board to observe the principles of this Code. Management shall ensure their action is consistent with the spirit of this Code and promote good culture of ethics through their internal and external interaction with all stakeholders of the Group.

5.0 EMPLOYEES' RESPONSIBILITIES

All employees are required to:

- adhere to the provisions of this Code; and
- report any suspected violations in accordance with whistleblowing policy of the Company.

It shall be noted that non-compliance of this Code may not only entails disciplinary sanctions, but also criminal charges.

6.0 DOCUMENTATION

Copy of this Code shall be included in Employee Handbook. All employees are required to read and familiarize with this Code and acknowledge their understanding and compliance with the Code annually during their employment with the Group.

EASTLAND EQUITY BHD

CORPORATE CODE OF CONDUCT AND ETHICS

7.0 REPORTING OF VIOLATIONS

Any employee who knows of, or suspects any violation of this Code is required to report the incidence in accordance with the Group's whistleblowing policy and procedure.

8.0 PUBLICATION OF CORPORATE CODE OF CONDUCTS AND ETHICS

Copy of this Code shall be published in the Company's corporate website.