

EASTLAND EQUITY BHD

CORPORATE CODE OF CONDUCT AND ETHICS

1.0 OBJECTIVE

The Board wishes to define its principles of code of ethics to:

- i. Provide guidance to stakeholders on the ethical behaviors to be expected from the Group; and
- ii. Communicate, measure and monitor its values and performance designed to achieve objectives and to instill values.

2.0 THE PRINCIPLES OF OUR CODE OF ETHICS

We are responsible to:

- i. Our Clients, by constantly striving to improve our quality and competitiveness of our development ethically and responsibly in order to serve our clients better.
- 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 environments free from any form of danger and sexual harassment, acknowledging their dignity and recognizing their merit and providing fair remuneration and career for those who qualified and perform.
- iv. Our Communities, by embracing social equity and diversity, complying with regulatory requirements and supporting good causes and charities.
- v. Our Environment, by preserving and protecting the environment and natural resources to ensure sustainability.
- vi. Our Dependents, by treating them fairly and not exercising our position in an abusive way, taking advantage of them or manipulating them with our power and ability to punish or penalize them.
- vii. Our Shareholders, by upholding our code of ethics in conducting our business and creating wealth and rewarding them.
- viii. Our Stakeholders, by not accepting and giving any favors, rewards and benefits with an intention to corrupt and to bribe for improper gain and advantage.

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Complementing these general principles, the Group has further defined the following specific provisions with respect to insider trading, money laundering, corruption, conflicts of interest and abuse of power. It is provided that no Directors, Officers and staff shall:

- (a) Enter into any transaction in the securities while they are in possession of non-public information about that Company or recommend others to purchase the securities of the Company on the basis of insider information;
- (b) Assisting 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) Soliciting gifts or favours in connection with their official duties; or accepting gift which would create or give rise to the appearance of impropriety or bias that would damage the reputation of the Group;
- (d) Providing gift, bribes and benefits to influence other stakeholders in order to obtain and retain business or secure an unfair advantage in any business transaction;
- (e) Taking part in deciding with respect of any transaction, contract or proposed contract or arrangement in which s/he is interested, directly or indirectly; and
- (f) Abusing 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 define the Code of Conduct and Ethics of the Group and ensure the objectives of the Code are met by:

- a. Setting a role model in practicing the provisions in this Code;
- b. Committing and ensuring the implementation of appropriate internal systems to support, promote and strengthen the awareness and compliance with this Code;

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- c. Ensuring implementation of appropriate communication channel to receive feedbacks; and
- d. Integrating this Code into management decision, practices and procedures.

4.0 MANAGEMENT'S RESPONSIBILITY

Management should ensure this Code is readily available to all staff members and communicate the Code with staff members periodically to reinforce its importance and relevance.

In making operational and business decisions, the management is responsible to the Board to observe the principles of this Code. Management shall ensure their action 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 STAFF MEMBERS' RESPONSIBILITIES

All staff members 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 themselves with the Code and acknowledge their understanding and compliance with the Code annually during their employment with the Group.

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7.0 REPORTING OF VIOLATIONS

Any employee who knows of, or suspects a violation of the 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 corporate website.