



(Company No. 217120- W)

(Incorporated in Malaysia under the Companies Act, 2016)

CODE OF CONDUCT & ETHICS

OVERVIEW

1.0 PURPOSE AND SCOPE OF THE CODE

1.1 This Code of Conduct and Ethics (known as the “Code”) applies to all Employees and Directors of Evergreen Fibreboard Berhad (the “Company”) and its subsidiaries (the “Evergreen”), including full-time or permanent employees, part-time employees, employees on probation, trainees and interns, employees on secondment and personnel on fixed-term contracts (the “Employees”).

1.2 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 the Evergreen Group operates in.

1.3 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

2.1 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 Chairman of the Board (in the case of any Director) or the Company’s Head of Human Resources Department or Employee’s Head of Department (in all other cases) or such other officer designated by the Company from time to time.

2.2 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.

2.3 This Code is to be read and applied in conjunction with all other related or applicable policies, procedures and guidelines which are published in Evergreen’s Blue Ocean Enterprise Management System (EMS).

3.0 AMENDMENTS TO THE CODE

The Board of Directors of Evergreen has approved this 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 mission or other relevant factors. Employees will be informed of any update or amendment to the Code by circulation of the amended code.

4.0 EXPECTATIONS ON EMPLOYEES AND DIRECTORS

4.1 All are expected to Read, Understand & Comply to this Code including the Laws of the countries which the Group of companies operates in and sells their products to.

4.2 At all times, use your good judgment and avoid any improper behavior. Always be mindful of your actions and ask for Guidance if in doubt. Before you act on anything, always ask yourself these questions:

- a) Is this in compliance with the Code or the law of the country?
- b) Is this ethical?
- c) Is this legal?
- d) Will it reflect well on me and the Company / Group?
- e) Would I want to read about it in the newspaper?

4.3 If the answer is “NO” to any of these questions, DON’T DO IT. If you are still uncertain, SEEK HELP immediately from the Compliance Officer of the Group.

4.4 The Code established tries to capture as many situations that employees may encounter during the course of their duties but it may not be able to address every circumstances. Therefore, seek clarification when you are unsure of any matter or action to be taken.

4.5 Senior Management, Managers and Head of Departments are expected to promote a Culture of Good Ethics in full compliance to the Code and they shall at all times model an appropriate conduct. It is also your duty to ensure that your subordinates understand their responsibilities under the Code.

5.0 EQUAL OPPORTUNITY AND NON-DISCRIMINATION

Evergreen 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 are encouraged and must strive to create a workplace where everyone is treated fairly and equally.

WORKPLACE CULTURE AND ENVIRONMENT

1.0 SAFETY / HEALTH AND ENVIRONMENT

On Safety & Health

Evergreen 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.

On Environment Control

Evergreen is committed to ensure the environment requirements are followed and Head of each Business Operations Unit must ensure compliance to the rules and regulations of the Environmental Quality Act, which is applicable to the whole of Malaysia by ensuring Required approvals and licenses needed in each location of operations are being obtained and renewed when necessary; and Air, Water and Waste (Discharge/ Emission/ Management) regulation under this act are being complied by all operating business units/ plants.

2.0 HARASSMENT, THREAT AND VIOLENCE

Evergreen 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.

3.0 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. Evergreen Group 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.

4.0 ABUSE OF POWER

4.1 Abuse of power or power harassment is the misuse of authority to take actions in personal interest that negatively impacts the company and employees. It is a form of workplace bullying but specifically conducted by a superior. Misuse of authority is common in places with lack of supervision over people in power. Examples of abuse of power by a Superiors: -

- a) constantly reminding an employee that they can be fired or replaced;
- b) humiliating an employee in front of his colleagues;
- c) forcing an employee to work overtime without being paid;
- d) mistreating employees when he/she is in a bad mood;
- e) condescending reactions to employee questions;
- f) constantly shifting the blame on employees for their own in-competencies;
- g) withholding critical information from an employee that he/she needs to know;
- h) putting personal interests before the company; and
- i) enforcing company's policies and rules on others without following them.

4.2 Any form of abuse of power by any Director or Managers/Supervisors MUST be reported immediately through the Whistleblowing Policy channels made available on the company's website to eliminate such act/wrong doings.

5.0 SEXUAL HARASSMENT

5.1 A Policy on Sexual Harassment has been established and any form of harassment by any level towards an employee is unacceptable as it is the Group's policy to provide all employees with a working environment free from any form of sexual harassment. Any questions concerning this issue should be directed either to the Person In- Charge of the Operations Unit or the Compliance Officer of the Group.

5.2 All such reports and/or complaints shall be treated with strict confidence. A separate policy on Sexual Harassment has been established and maintained by the Human Resource Department in each Operating Business Unit as required by law.

6.0 ACT OF MISCONDUCT

Employee shall not be involved in or abet in any activity(s) that is deemed by the Company/Group to be an act of misconduct which includes the use drugs or alcohol. A list of all misconduct can be obtained from the Human Resource Department.

7.0 ON HUMAN RIGHTS

7.1 All level of employees in the group are required to respect and promote human rights in accordance with the Guiding Principles on Business and Human Rights in our relationship with employees (especially foreign workers of any country), suppliers and independent contractors.

7.2 Where any adverse human rights impact resulting from or caused by our business policies have been identified, we are committed to cooperate in a fair and equitable manner for remediation.

7.3 All employees are to be treated with dignity and respect and will also seek to promote access to remediation where we are linked to or involved in any adverse impacts through our relationships with third parties. Any abuse of any kind is to be reported through our whistleblowing policy channels which is made available on the company's website.

8.0 SALE OR PURCHASES BY EMPLOYEES (Assets of Company)

The Employee (include directors) Sale and Purchase Policy is designed to safeguard all involved in any sale of items to or by the company. The established procedures shall be fully complied by all employees involved in such transactions. Any breach of these procedures will be regarded as gross misconduct and could potentially result in disciplinary action taken.

COMPANY INFORMATION, RECORDS AND ASSETS

1.0 DATA INTEGRITY AND PERSONAL DATA PROTECTION ACT ("PDPA 2010")

Evergreen has put in place the Personal Data Protection Policy and Document Management Policy. Employees shall record, manage, store and transfer all data and records in compliance with applicable legal, tax, regulatory and accounting requirements.

Employees who handle the personal data of others must at all times: -

- (a) Act in accordance with applicable law;
- (b) Act in accordance with any relevant contractual obligations;
- (c) Collect, use and process such information only for legitimate business purposes;
- (d) Limit access to the information to those who have a purpose only; and
- (e) To prevent unauthorized disclosure on such information.

2.0 PROTECTION OF ASSETS & MISUSE OF INFORMATION / RESOURCES

Evergreen 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 the Group's assets and resources.

2.1 Company's Assets

a) Always protect the Company's assets and use those assets in the manner intended only. Do not use Company's assets for your personal benefit or for the benefit of anyone other than the benefit of Company;

b) Use common sense. For example, the occasional personal phone call or e-mail from your workplace is

acceptable. Excessive personal calls or e-mail is a misuse of assets;

c) Company policy may include additional personal use of certain assets, such as a Company car or wireless communication device. Always check relevant internal policies to ensure that you are using Company assets as intended;

d) Theft of Company's assets is deemed when unauthorized removal of Company product, equipment or information, or theft through embezzlement or intentional misreporting of time or expenses will result in disciplinary action which may include termination or / and criminal prosecution; and

e) The Company treats workplace theft of assets belonging to other employees the same way it treats theft of Company's assets.

2.2 Use of time, equipment and other assets

2.2.1 Do not engage in personal activities during work hours that interfere with or prevent you from fulfilling your job responsibilities.

2.2.2 Do not use Company computers and equipment for outside businesses, or for illegal or unethical activities such as gambling, pornography or other offensive subject matter.

2.2.3 Do not take for yourself any opportunity for financial gain that you learn about because of your position in the Company, or through the use of Company property or information.

2.2.4 Examples of company assets: -

- (a) Company's money;
- (b) Company's products;
- (c) Employees' time at work;
- (d) Computer systems and software;
- (e) Telephones;
- (f) Wireless communication devices;
- (g) Photocopiers;
- (h) Company vehicles;
- (i) Proprietary information; and
- (j) Company trademarks / Patent.

2.3 Use of Information

2.3.1 Always safeguard the Company's non-public information, which includes everything from contracts, and pricing information to marketing plans, technical specifications including employee information.

2.3.2 Do not disclose non-public information to anyone outside the Company, including your family and friends, except when disclosure is required for business purposes. Even then, take appropriate steps, such as execution of a confidentiality agreement, to prevent misuse of the information.

2.3.3 Do not disclose non-public information to others inside the Company unless they have a business reason to know. Employees are obligated to protect the Company's nonpublic information at all times, including outside of the workplace and working hours, and even after employment ends.

2.3.4 Retain or discard Company records in accordance with the Company's record retention policies.

2.3.5 Company's Compliance Department occasionally may issue notices regarding retention of records in the case of actual or threatened litigation or government investigation. Employees must abide by the directions contained in these notices, as failure to do so could subject the Company and employees to serious legal risks.

2.3.6 What is non-public information? It is any information that the Company has not disclosed or made generally available to the public which includes information related to: -

- (a) Employee's data;
- (b) Inventions;
- (c) Contracts;
- (d) Strategic and business plans;
- (e) Major management changes;
- (f) New product launches;
- (g) Mergers and acquisitions;
- (h) Technical specifications;
- (i) Pricing;
- (j) Proposals;
- (k) Financial data; and
- (l) Product costings.

3.0 RECORDS AND REPORTING

3.1 Evergreen has put in place the Enterprise Management System Document Management Policy which sets out the time period to retain and destroy data and records, based on the specific statutory and regulatory requirements, some of which are specific to a particular business operations or functions. Employees are responsible to retain and store proper records in compliance with company policy, legal and regulatory requirements.

3.2 Employees are required to protect the Group'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.

4.0 CONFIDENTIALITY AND INFORMATION SECURITY

4.1 "Confidential Information" shall mean: -

- a) any documents include notes, memorandum, record, report, calculations, data or information that is not generally known to the public, including, but not limited to the payroll/employee data / salary/allowances/bonuses information / business, financials / accounting and operations, customer relationships, customer profiles, customer data / or other customer, vendor or business partner information spending patterns, internal performance results relating to the past, present, or future business activities, assets, financial / costing, operation, strategies, business plans prospects and drawings relating to the Company / Group howsoever made available for inspection, furnished or supplied;
- b) any specific or technical information / drawings, specifications, financial information, design, process,

procedure, formula or improvement, modification of machinery and equipment, operations that is commercially valuable and not publicly available; and

c) all confidential or proprietary concepts, documentation, reports, data, specifications, customer software, source code, company / group software system or access codes, object code, flow charts, databases, inventions, information, know-how and trade secrets, whether or not patentable or copyrightable.

4.2 Employees shall at all times exercise caution and due care to safeguard any information of confidential and sensitive nature relating to the Company / Group that are strictly prohibited to disclose to any outside person (s).

5.0 BUSINESS AND FINANCIAL RECORD KEEPING & ACCURACY

5.1 Person in Charge shall ensure the accuracy of all Company business and financial records. These include not only financial accounts, but other records such as quality reports, inventory records, time records, expense reports and submissions such as benefits claim forms and resumes. Ensuring accurate and complete business and financial records is everyone's responsibility, not just a role for accounting and finance personnel. Accurate recordkeeping and reporting, reflects on the Company's reputation and credibility and shall ensure that the Company meets its legal and regulatory obligations.

5.2 Ensure that all reports to regulatory authorities are full, fair, accurate, timely and understandable. Never falsify any document and do not distort the true nature of any transaction.

5.3 Never enable another person to evade taxes or subvert any laws. For this reason, payments generally should be made only to the person or firm that actually provided the goods or services. Payments should be made in the supplier's name, where it does business, or where the goods were sold or services provided, unless the supplier legitimately has assigned payment or sold its accounts receivable to another entity. Exceptions must be approved according to the Limit of Authority.

5.4 The Group adopts records management and procedures which reflects the Group Records keepings. All employees have an obligation to manage their business records in accordance with the applicable records keeping procedures.

5.5 All transactions and contracts must be properly and accurately authorized and recorded as required under the Limit of Authority.

DUTIES OF GOOD FAITH, DILIGENCE AND INTEGRITY

1.0 CONFLICT OF INTEREST

1.1 Every employee has the obligation to disclose any conflict of interest that they may have with the Company/Group. This shall apply not only to situations where employee him/her self is directly connected to a director/employee of the company but also to a situation involving their family members or related persons/party, where this shall be required to be disclose and adhere to the Policy on Conflict-of-Interest (EFB-QP-COR-12). Any Director / Employee with a conflict of interest Shall & Must disclose any obligation, commitment, relationship or interest that could conflict or may be perceived to have conflict with his or her duties by making a declaration using the Conflict-of-Interest Disclosure document which is made through the following link:

<https://docs.google.com/forms/d/e/1FAIpQLSeE5xI6BfNow6Tlk9h9vKCDkiQA8Zc1Q20QjNi34JNPiDM9bQ/viewform>

1.2 This disclosure obligation for any Conflict of Interest includes Conflict of Interest that exist with Suppliers, Customers which have significant transactions or dealings with the Company / Group.

2.0 INSIDER TRADING

2.1 An insider is an employee of the company/group who has access to price sensitive non-public information which could affect the share price of the Company. If any employee uses or provides such information for a profit or to avoid loss, his or her conduct is considered as unlawful. Trading the Company's stocks or securities based on material non-public information or providing material non-public information to others so that they may trade, is illegal and can result in criminal prosecution by authorities.

2.2 Senior Managers and Managers who has privilege information as stated in of 7.1 above, Shall and must comply with the Main Market Listing Requirements in respect of dealings during the "Closed Periods" (meaning 1 (one) month before announcement of financial results and 2 (two) days after such announcement) for any trading of the Company's shares. Failing to comply, the Exchange under any written law in relation to the enforcement of this Requirements, may take or impose for a breach of the above Requirements which may include a fine or a jail term or both. (A Reminder Email will be circulated on this matter during these periods.)

3.0 ACCEPTING & PROVIDING GIFTS AND OTHER BENEFITS

3.1 As a general rule, Employees are discouraged from giving or accepting gifts, entertainment or other benefits to or from business partners. Notwithstanding this, Evergreen 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; and
- 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.

3.2 All receiving and giving of any meals/gifts/entertainment MUST be declared by the Receiver/Giver (himself/herself) through the Group's Gift Giving & Receiving Online E-Reporting System. Link to make such reporting: -

https://docs.google.com/forms/d/e/1FAIpQLSf4IVdBGOKdhdzxwtlkAv4qeCWJNAnU0L-8Ni_OTcj3W4JtuQ/viewform?usp=sf_link

4.0 ANTI- BRIBERY AND ANTI-CORRUPTION

4.1 A Policy on Anti-Bribery/Corruption has been established and put in practice by the Group with more specific guidance about payments in view of the latest amendment to the Malaysian Anti-Corruption Commission Act which introduced a new Section 17A under Corporate Liability. All employees shall make themselves aware of this Policy / Procedures on Anti Bribery & Anti-Corruption (EFB-QP-COR-07 POLICY ON ANTI BRIBERY AND ANTI CORRUPTION) including any updates. An awareness training portal at <https://efb.no-bribery.com> has been established.

5.0 ANTI-TRUST AND COMPETITION LAW

5.1 Anti-trust/Competition laws protect consumers from abusive practices and help to ensure that the market works properly and that competition among companies are fair. The Group believes in free competition and shall compete fairly in the marketplace and comply with the applicable competition laws.

5.2 All employees especially in the department of procurement and marketing are expected to be aware of the Anti-trust / Competition Law and be fully compliant with the Standard Operating Procedure No: EFB/QP/SDM-11.

6.0 TRADE RESTRICTIONS AND SANCTIONS

6.1 Employees shall comply to all applicable trade restrictions and boycotts imposed by the Malaysian government. Such restrictions prohibit the Company from engaging in certain business activities in specified countries, or specified individuals or entities. These restrictions may include prohibitions on interaction with identified terrorist organizations or narcotics traffickers. Employees involved in performing such transactions shall at all times abide to the restriction or prohibitions. If unsure, please refer to the Head of Business Operations or the Compliance Officer of the Group.

6.2 Economic and trade sanctions may impact upon the businesses of the Group by restricting the extent to which they can operate within certain jurisdictions and employees are expected to be aware and fully compliant with the Malaysian Government recognition on sanctions regimes. Employees involved in performing such transactions shall at all times abide to the sanction restriction imposed. If unsure, please refer to the Compliance Officer of the Group.

7.0 MONEY LAUNDERING

Money laundering is an offence under the Anti-Money Laundering Act (“AMLA”) and is the action of concealing the identity of illegally obtained money so that it appears to have come from a lawful source or can be transformed from “dirty” money to “respectable” money or other assets. Most countries including Malaysia have imposed laws making it a criminal offence to engage in money laundering activity. Generally, such laws will make it an offence for any person or company to engage in transactions involving assets which they know are derived from criminal activity.

8.0 OWNERSHIP OF RIGHTS (PATENT)

Employees may during the course of employment make an invention or discover or modify, adapt or improve upon existing products, machineries or equipment or techniques used or be used by the Company/Group in connection with their respective business. Employee must understand that any and all intellectual property rights, including but not limited to Patents, copyright, design rights and information hereto on all works made by employee or jointly with others, during and arising out of employment shall be and remain the property of the Company and employee is not allowed to remove or share any of its information at any time with any outside party or make any claims or demand or bring any action against the Company in respect of the same.

9.0 TRANSFER PRICING ACT REQUIREMENTS

Transfer pricing legislation requires taxpayers to determine and apply the arm’s length price for the acquisition or supply of property or services to an associated person pursuant to Section 140A of the Income Tax Act 1967 (“ITA”). This section empowers the Director General of the Inland Revenue Board (“IRB”) to substitute the price in respect of any property or services to reflect the arm’s length price for

the transaction as well as to disallow a portion of interest and finance charged that relates to financial assistance which is excessive. Please refer to Policy on Transfer Pricing No: EFB-QP-FIN-P2.

10.0 COMPLIANCE TO LAWS & REGULATIONS

All level of employees SHALL and MUST observe the relevant Laws (local country laws) & Regulations applicable to the Group's businesses at all times. As the laws and regulations that apply to the Group's businesses are numerous and often complex, therefore, in case of doubts, Employees must seek guidance from their Head of Operations (Operations Director/Manager) or the Compliance Officer of the Group.

GENERAL

1.0 UNDERTAKING BY ALL EMPLOYEES

1.1 Every employee in the Group shall undertake to be bound that in the course of and as a result of their employment, they may have access to or may become acquainted with information which may be designated by Company / Group as confidential by virtue of the law or by virtue of a trade secret ("the Confidential Information"). Employees must understand and agree, that both during and after employment, they shall not to divulge any Confidential Information to any person or entity other than required by relevant regulatory authority/law and they shall maintain the confidentiality of the Confidential Information and to take reasonable steps to prevent its unauthorized disclosure or use by any other person or entity.

1.2 Employees shall further undertake not to remove / duplicate/ transmit/publish/ share any documents, information or tangible item which belongs to the Company/ Group that may contain any "Confidential Information" without prior proper written consent from the Compliance Officer of the Group.

2.0 WAIVER

Waiver of any provisions of this Code for any level of employees in the Group must be approved by the Board of Directors and shall be disclosed promptly to the extent required by the law.

3.0 GROUP'S COMPLIANCE OFFICER

The Compliance Officer of the Group is available to answer any questions about the Code or Company Policies, or to discuss any concerns that you may have about a potential violation of the Code or any part to it. To contact the Compliance Officer, you can do so in the following method:

(a) Write and mail to the: -
Compliance Officer, Human Resource Department,
Evergreen Fibreboard Berhad,
PLO 22, Parit Raja Industrial Estate, 86400 Parit Raja,
Johor, Malaysia.

Or

(b) Contact mobile or whatsapp @ 6019-7660387

Or

(c) E-mail to enquiry@efb.com.my

4.0 COMPLIANCE TO THE CODE, POLICIES & PROCEDURES & LAWS

4.1 The procedures for handling potential violations of the Code are developed to ensure consistency in processes across the Group. No set of rules can cover all circumstances and these guidelines may be varied as necessary to conform to local laws or regulations.

4.2 Enforcement of the Code shall be the responsibility of the Senior Management and Head of Operation of each subsidiary/Business Unit.

5.0 INVESTIGATION OF POTENTIAL VIOLATIONS

The Board takes all reports of potential Code and any other types of violations seriously and is committed to confidentiality and a full investigation of all allegations. Employees who are being investigated for a potential Code violation will have an opportunity to be heard prior to any final determination. The Company shall follow the Investigation under its Disciplinary Procedures of each location.

5.1 Decisions on Findings

The Human Resource Department (Group Level) together with the Disciplinary Committee shall jointly make decisions about the disciplinary action for any Code violations and they may delegate certain categories of decision to higher management if so necessary. Those found to have violated the Code can seek reconsideration of disciplinary action decisions by writing to the Board of Directors.

5.2 Disciplinary Actions

Disciplinary action shall be taken in accordance with the Group's Policy on Disciplinary Procedures for a major misconduct of the Code which will be decided by the Senior Management for Employees and the Board for Senior Management level & Director.

5.3 Reporting of Decisions and Investigations

The Group Head of Human Resource shall on a quarterly basis report on all the Code non-compliance including any investigations and final Code investigations decisions, including disciplinary actions taken, to the Executive Directors and if needed Executive Directors shall then report the same to the Audit Committee of the Board.

6.0 PROTECTION AGAINST DETRIMENTAL ACTION

6.1 Any Employee/ Director who makes a report in good faith shall not be subject to unfair dismissal, victimization, demotion, suspension, intimidation or harassment, discrimination, any action causing injury, loss or damage or any other retaliatory actions ("Detrimental Action") by the Company.

6.2 Any report made in good faith by an Employee, even if it is not subsequently confirmed by an investigation shall be eligible for this protection under this Policy.

6.3 Any person that makes a report in good faith and who has been subject to Detrimental Action by the Company may lodge a complaint through the channels in this Policy.

6.4 An Employee / Director who takes any Detrimental Action against any Employee who has made a report of corruption practice in good faith shall be subject to disciplinary action by the Board of Directors.

7.0 RAISING CONCERNS BY WHISTLEBLOWING

7.1 All Employees have the obligation to uphold ethical standards of the Group. If you happened to observe a behavior that maybe a concern or that may represent a violation of the Code, raise the issue promptly to your Superiors immediately. Doing so will give the Company an opportunity to deal with the issue(s) and correct it soonest possible, ideally before it becomes a violation of law or a risk to health, security or to the Group's reputation.

7.2 There are several options for raising issues and concerns, where an employee can report it to his/her Immediate Superior. However, if for any reason the employee is reluctant to do so, then the employee can and should raise his / her concerns through the following steps:

OPTION 1

Firstly, to report directly to the Executive Directors via their email address as below: -

- 1) jenchangkuo@gmail.com (Mr. Kuo Jen Chang)
- 2) jenchiu@efb.com.my (Mr. Kuo Jen Chiu)
- 3) mary@efb.com.my (Mdm. Mary Lim)

Or

OPTION 2

(a) Immediately raise your concerns to the Company's Whistleblowing email address at whistleblowing.efb@bakertilly.my . This email link is made available on the Company's website at www.evergreengroup.com.my .

(b) All reports received through this channel will go directly to Baker Tilly MH Governance and they shall handle it confidentially where all valid reports received will be directed to the Audit Committee for their immediate attention and action.

(c) The Committee/BOD takes all complaints/reports seriously and will investigate the reported matter confidentially to determine whether the law has been violated and thereon take appropriate needed actions.

This Code is made available on the company's website at www.evergreengroup.com.my .

Policy adopted by the Board in: May 2013 - Effective: June 2013

Reviewed in: January 2016 – Effective: February 2016

Reviewed in: October 2019 – Effective: November 2019

Reviewed in: July 2021 – Effective: August 2021

Reviewed in: October 2022 - Effective: November 2022

Reviewed in: May 2025 - Effective: June 2025

*****End*****