



(Company No. 217120- W)

(Incorporated in Malaysia under the Companies Act, 2016)

**POLICY
ON
CODE OF CONDUCT
&
BUSINESS ETHICS**

1.0 OBJECTIVE OF POLICY

This Policy on the Code of Conduct and Business Ethics (known as the “Code”) is established to instill good Corporate Governance practices in all level of employees within the Group of Companies (“EFB” or the “Company / Group”) with basic expectation that all employees act with Integrity and Professionally at all times while carrying out their duties for and on behalf of the Company / Group.

2.0 SCOPE OF POLICY

This Policy covers all levels of Employees within the Group.

3.0 DEFINITIONS

Acting with Integrity means doing what is right at all times and acting with integrity as to reflect positively on the values and reputation of the Company/ Group. As Employees, you are obliged to do what is right for yourself as well as for the Company/Group and you shall abide to the laws, rules and regulations of the country you are in and be fully accountable for your actions.

4.0 EXPECTATIONS ON EMPLOYEES

4.1 All employees 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 by you: -

- a) Making opportunity to explain the Code and reinforce the importance of ethics and compliance with your subordinates;
- b) Creating an environment where any employee feels comfortable raising concerns without fear of retaliation;
- c) Considering one’s conduct in relation to the Code and other Company’s policies when evaluating your subordinates;

d) Never encouraging or directing employees to achieve business results at the expense of violating the Code, company's policies, country laws, rules or regulations; and

e) Always stepping up to stop any violations of the Code, Procedures, Rules, Regulations or the Law.

4.6 As a Manager/Head of Department, you MUST always respond to Questions and Concerns raised by a subordinate especially when approached with a question or concern related to the Code. Answer if you can. Do not try to define the Code and if you are not sure, seek the needed help. If a subordinate or an employee raises a concern that may require investigation under the Code, your duty will be to contact the Compliance Officer of the Group immediately and forward such information as received.

4.7 Certain actions may require higher level approval depending on the seriousness and risk of the matter. Therefore, the Limit of Authority (LOA) on approvals required for specific transactions has been established in all Operations Units to ensure proper approvals are being obtained prior to transaction being carried out. Always refer to the LOA of each operating units to ensure you are authorized to give such approvals needed. If you are not the authorized person, refrain from giving such approval and seek necessary advice.

5.0 LAWS & REGULATIONS

5.1 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.

5.2 Employees are required to observe the highest ethical standards whenever carrying out their duties or doing business for or on behalf of the Company / Group and they should never compromise the Code or any laws for the sake of results under any circumstances.

5.3 Good judgment may be needed where observance of local customary/law or practice would produce a result different from what is envisaged by the Code. In such a case, the person or employee should ask himself or herself whether he/she will be able to justify his/her actions. And if in dilemma and cannot be resolved, he/she must bring the matter to the attention of his/ her Superior or if needed to the highest level of the particular Business Unit.

6.0 CONFLICT OF INTEREST

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/1FAIpQLSeE5xI6BfNow6Tlk9h9vKCDkiQA8Zc1Q200jNi34JNPiDM9bQ/viewform>

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.

7.0 INSIDER TRADING

7.1 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.

7.2 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.)

8.0 ANTI- BRIBERY AND ANTI-CORRUPTION

8.1 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. Employees are to acknowledge the trainings and sit for a test on the understanding on a yearly basis. This policy covers the following matters and you are advised to refer to this Policy relating to these items: -

- a) Donations and Sponsorship;
- b) Facilitation Payment;
- c) Personal Gifts;
- d) Dealing with Government Officials;
- e) Political Contributions;
- f) Charitable Contributions;
- g) Entertainment, Gifts and Meals;
- h) Payments (Cash or In-Kinds); and
- i) Hospitality.

8.2 As the Group tolerance on Bribery & Corruption is Zero, violation of the Group's Anti-Bribery/Corruption Policy will result in serious disciplinary action against employees and appropriate sanction shall be place upon agents /companies.

9.0 ANTI-TRUST / COMPETITION LAW

9.1 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.

9.2 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.

9.3 If you are in any doubt as to whether a particular business practice or activity will infringe any competition law or the Group's guidelines on fair competition rules, the matter should be referred to the Head of Operations or the Compliance Officer of the Group.

10.0 TRADE RESTRICTIONS / SANCTIONS

10.1 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.

10.2 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.

11.0 MONEY LAUNDERING

11.1 Money laundering 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.

11.2 Money laundering is an offence under the Anti-Money Laundering Act ("AMLA") and is defined to mean the act of a person who:

- (a) engages, directly or indirectly, in a transaction that involves proceeds of an unlawful activity;
- (b) acquires, receives, possesses, disguises, transfers, converts, exchanges, carries, disposes, uses, removes from or brings into Malaysia proceeds of any unlawful activity;
- (c) conceals, disguises or impedes the establishment of the true nature, origin, location, movement, disposition, title of, rights with respect to, or ownership of, proceeds of an unlawful activity;
- (d) Any person who engages in or attempts to engage in; or abets the commission of money laundering commits an offence and shall on conviction be liable to a fine not and or to imprisonment or both; and
- (e) The Group and its employees shall: -
 - (i) never engage in any such transaction which they know or suspect involves the proceeds of criminal activity;
 - (ii) not knowingly involved directly or indirectly in any money laundering activity; and
 - (iii) pursue practices directed towards ensuring that their activities do not inadvertently contravene any relevant money laundering legislation.

12.0 ABUSE OF POWER

12.1 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.

12.2 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.

13.0 SEXUAL HARASSMENT

13.1 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.

13.2 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.

14.0 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.

15.0 PERSONAL DATA PROTECTION ACT ("PDPA 2010")

15.1 The Company respects the privacy of its employees, business partners and customers and shall handle their personal data responsibly and in compliance with the applicable privacy laws.

15.2 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.

15.3 Always refer to your Head of Business Operation Unit and only then to the Compliance Officer of the Group for additional guidance on handling of personal data or an abuse of data has been discovered.

16.0 CONFIDENTIALITY AND INFORMATION SECURITY

16.1 "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.

16.2 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).

Undertaking by all Employees

16.3 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.

16.4 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.

17.0 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.

18.0 GOVERNING LAW & JURISDICTION

The confidentiality and secrecy shall remain in full force and effect notwithstanding the termination of employee's employment / director with the Company. Confidentiality Undertakings shall be governed by and construed in accordance with the laws of Malaysia and the parties hereto shall submit to the jurisdiction of the Courts of Malaysia.

19.0 GENERAL GUIDELINES

19.1 All transactions must be conducted on normal commercial terms required by law without any form of under or over declaration in documentations for the benefits of the buyer.

19.2 All documents prepared by the responsible employee in conjunction with export /local sales of its goods (e.g., Shipper's export declarations, Tax Invoices, Export license applications and Bills of lading) shall be stated accurately and complete to give a true and proper view of the actual transaction and not otherwise.

19.3 Head of Department concern shall ensure proper declaration records of all Sales transactions, including correspondence exchanged when setting- up the deal and accounting records must be kept in accordance with the Group's Records keeping procedure.

19.4 Any form of under declaration which does not give true and proper view of the actual transaction is strictly prohibited and any level of employee found to do so shall be dealt with according to the Group's Disciplinary Procedures without compromise and Individuals involved shall bear full responsibility on the consequences pertaining to the action by authorities.

20.0 COMMISSION AND WITHOLDING OF TAXES

20.1 Any requests for payment of commission to anyone other than the recognized sales agents (and this includes individuals who may be officers of the contracting party) or to any place other than the recognized sales agent's principal place of business shall not be entertained unless the Company is given:

- a) a letter of authority from a duly authorized person of the contracting party or the relevant contract so provides;
- b) a confirmation that such payment does not break local law and that all necessary approvals from any appropriate authority have been obtained; and
- c) approval by Group Executive Director and Group Chief Operating Officer is required prior to any commission is paid.

21.0 PROTECTION OF ASSETS & MISUSE OF INFORMATION / RESOURCES

Acting with integrity begins within the highest level in the Company/Group, and that includes how each and every one deals with Company's resources, records, assets and information.

21.1 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.

21.2 Use of time, equipment and other assets

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

21.2.2 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.

21.2.3 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.

21.2.4 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.

21.3 Use of Information

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

21.3.2 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.

21.3.3 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.

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

21.3.5 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.

21.3.6 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.

22.0 BUSINESS AND FINANCIAL RECORD KEEPING & ACCURACY

22.1 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.

22.2 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.

22.3 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.

22.4 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.

22.5 All transactions and contracts must be properly and accurately authorized and recorded as required.

23.0 TRANSFER PRICING ACT REQUIREMENTS

23.1 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.

23.2 Head of Business Operation Units (Operations Director/Manager), Head of Department and Employees specifically in the area of Marketing, Procurement and Accounts shall make themselves aware of this ruling and its updates and ensure compliant with the transfer pricing laws on any Sales and Services provided to related companies within the group including the keeping and filing of the necessary supporting documents at all times. Please refer to Policy on Transfer Pricing No: EFB-QP-FIN-P2

23.3 In the event that there is any doubt as to whether a particular business practice or activity will infringe any transfer pricing law, the matter should be referred to the Compliance Officer of the Group.

24.0 MINIMUM WAGE AND RETIREMENT ACT

Head of Business Operation Units (Operations Director/Manager) shall ensure at all times comply to the National Minimum Wages Act 2012 that had come into effect periodically. Compliance to this act together with the periodic changes shall be ensured to be carried out by the Head of Human Resource Departments.

25.0 SAFETY & HEALTH AND ENVIRONMENT ACT

On Safety & Health

Head of Business Operations Units shall at all times ensure a safe workplace and maintain proper occupational health and safety practices to commensurate with the nature of the Group's business and activities. Employees in return shall understand and abide to the Group's Safety Policies and Procedures in particular: -

- (a) Smoking Prohibition in the factory production and air condition areas;
- (b) Wearing of Personal Protective Equipment supplied at all times;
- (c) Attend Safety & Health Awareness Trainings organized by the Group;
- (d) Work in a Safe Conscious Manner at all times; and
- (e) Always remember that Safety & Health come first.

On Environment Control

Head of Business Operations Units shall ensure compliance to the rules and regulations of the Environmental Quality Act 1974, which is applicable to the whole of Malaysia by ensuring that:

- (a) Required approvals and licenses needed in each location of operations are being obtained and renewed when necessary; and
- (b) Air, Water and Waste (Discharge/ Emission/ Management) regulation under this act are being complied by all operating business units/ plants.

26.0 ON HUMAN RIGHTS

26.1 All 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.

26.2 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. Company shall treat all our employees 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.

27.0 SALE OR PURCHASES BY EMPLOYEES (Assets of Company)

This Employee (Employees shall include directors) Sale and Purchase ("Transaction") Policy is designed to safeguard all involved in any sale of items to or by the company. The following procedures are importance and 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 or a possible dismissal.

Procedure for a Sale or a Purchase by Employee

27.1 For a Sale or Purchase agreed by employee and company, any attempt to deliberately lower or heighten the price than it should be at the time of the sale / purchase is made or which is heighten / reduced to a disproportionately high / low price, will be viewed as personal gain.

27.2 All sale / purchases between employee and company shall consist a signed original Delivery Order and Tax Invoice clearly stating the item(s) sold / purchase. Any removing items before proper documents has been made will be viewed as misappropriation of the items and regarded as a gross misconduct offence.

27.3 The price of the product / item for sale / purchase shall be the same price made available to any third party and if it is a used item, the price shall be the net book value indicated in the financial records of the company.

27.4 For sale of company's properties, based on the net book value, a discount of not more than 15% can and maybe approve by Management.

27.5 Any employee sale or purchase exceeding the amount of RM5,000 shall require prior approval from one of the Executive Directors before transaction can be processed.

27.6 Any Sale or Purchase involving Key Officers or Directors of the Company, shall be reported to the Audit Committee in the related Party Transactions session prior to transaction being processed.

27.7 All Sale and Purchase by employee shall be on an arms-length basis and shall comply to all the normal terms as given to any third party.

28.0 ACKNOWLEDGEMENT

All level of employees is required to acknowledge that they have read this Code of Conduct & Business Ethics and by acknowledging you agree to abide by its provisions. In the training portal at <https://efb.no-bribery.com> on Awareness of the Company's Anti-Bribery/Corruption Policy & Procedure, all employees will be required to do this online acknowledgement on a yearly basis.

29.0 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.

30.0 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,
Group Human Resource Department,
Evergreen Fibreboard Berhad,
PLO 22, Parit Raja Industrial Estate,
86400 Parit Raja,
Johor, Malaysia.

Or

(b) Call +607- 4541933 Ext: 157 (HP No: 60-19-7660387)

Or

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

Or

(d) Fax to +607-4542933

31.0 COMPLIANCE TO THE CODE, POLICIES & PROCEDURES & LAWS

31.1 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.

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

32.0 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.

32.1 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.

32.2 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.

32.3 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.

33.0 PROTECTION AGAINST DETRIMENTAL ACTION

33.1 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.

33.2 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.

33.3 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.

33.4 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.

34.0 RAISING CONCERNS BY WHISTLEBLOWING

34.1 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.

34.2 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 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

*****End*****