

FARLIM GROUP (MALAYSIA) BHD

Corporate Code of Conduct and Ethics

1. OBJECTIVES

The objectives of the Group's Code of Conduct and Ethics (this "Code") are:

- i. To set the tone and standards for the ethical conducts in the Group;
- ii. To communicate and provide guidance to stakeholders on the ethical behaviors and values expected from the Group and management; and
- iii. To measure and monitor management performance against the provisions in this Code.

2. PRINCIPLES

At Farlim, we are responsible to:

- i. Our Buyers, by offering them well-built properties that preserve its long-term value;
- ii. Our Contractors, business associates and partners who adhere to the universal principles of code of ethics, to make a fair profit;
- iii. Our Employees, by creating safe, healthy and secured working environments, acknowledging their dignity and merit, and providing fair remuneration and career;
- 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 Shareholders, by acting in their best interest without abusing our knowledge of confidential information in share trading and engaging in conflict of interest transactions; and
- vii. All Stakeholders, by not tolerating with any form of corruption and bribe, assisting in money laundering and abusing power to gain improper gains and advantage.

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3. BOARD'S RESPONSIBILITY

The Board shall ensure that 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 control systems, corruption preventive framework and anti-bribery guidelines to support, promote and strengthen the awareness and compliance with this Code;
- c. Implementing whistle blowing reporting channel to facilitate communication and feedbacks;
- d. Integrating the philosophy of this Code into the Group's decision, practices and procedures; and
- e. Monitoring management performance against the principles of this Code.

4. MANAGEMENT'S RESPONSIBILITY

Management shall:

- i. Observe and promote the principles of this Code;
- ii. Ensure that their actions and interaction with all stakeholders are consistent with the spirit of this Code; and
- iii. Communicate this Code to all staff members and stakeholders periodically and enforce the Code in the Group.

5. Reporting of Non-Observance

Stakeholder who knows of or suspects a violation of this Code is encouraged to report the incident to farlim@whistleblower.com.my or post to PO Box #911, L2- 08, Level 2, Cheras Leisure Mall, Jalan Manis 6, Taman Segar, 56100 Kuala Lumpur in accordance to the Group whistleblowing policy and procedure.

This Corporate Code of Conduct and Ethics is approved by the Board for publication on the Group's corporate website.