



Code of Conduct and Business Ethics

Leadership Message

A message from the Chief Executive Officer on EcoWorld's Code of Conduct and Business Ethics

Dear Team EcoWorld,

The success and reputation that EcoWorld has built over the years are founded not only on the quality of our developments, but also on the integrity, professionalism and accountability with which we conduct ourselves every day. These qualities have earned us the trust of our customers, business partners, shareholders, regulators and the communities we serve, and every one of us has a responsibility to uphold that trust.

As EcoWorld continues to grow and embrace new opportunities, technologies and ways of working, the principles that guide us remain constant. Whether we are planning a township, serving a customer, engaging a business partner or working alongside one another, the way we conduct ourselves matters just as much as the outcomes we achieve.

Our Code of Conduct and Business Ethics provides the framework that helps us make sound decisions, embrace good governance, protect the information entrusted to us, support our commitment to sustainable business practices, and treat one another with fairness, dignity and respect.

Just as importantly, we each have a responsibility to speak up if we encounter conduct that is inconsistent with our values or this Code. By raising concerns in good faith, we strengthen our culture of accountability and help protect the integrity and reputation of our organisation.

Every decision we make shapes the reputation of EcoWorld. I encourage every member of Team EcoWorld to read this Code carefully, understand your responsibilities and apply its principles in your daily work. Together, we will continue to earn the trust placed in us and uphold the standards that define EcoWorld.

Dato' Seri Chang Khim Wah
Chief Executive Officer
15th August 2026

Code of Conduct and Business Ethics

Executive Summary

Eco World Development Group Berhad and its group of companies (hereinafter referred to as “EcoWorld”) are committed to maintaining high standards of conduct and business ethics. The value of integrity is the cornerstone of this Code. Hence, everything in this Code expresses a commitment to performance with integrity.

This Code serves as a road map to help guide actions and behaviours while working for and/or dealing with EcoWorld. We expect and require each employee, as representative of EcoWorld, to also fulfil our commitment to good ethical behaviour. Business representatives engaged to act on EcoWorld’s behalf are also required to adhere to this Code and maintain high standards of conduct and business ethics.

For clarity, this Code applies to EcoWorld’s directors and employees, including permanent, contract, temporary, seconded and internship personnel. EcoWorld also expects vendors, suppliers, contractors, subcontractors, consultants, agents, representatives, service providers and other parties performing work or services for or on behalf of EcoWorld to comply with the principles of this Code, where applicable and as reflected in their contractual or engagement terms.

EcoWorld conducts its business with honesty and integrity, and respects the integrity of persons with whom we do business. We are committed to fair and impartial practices and comply with the laws and regulations. The same principle applies to EcoWorld’s business activities outside Malaysia. We shall, in each country where EcoWorld is active, abide by the laws of that country.

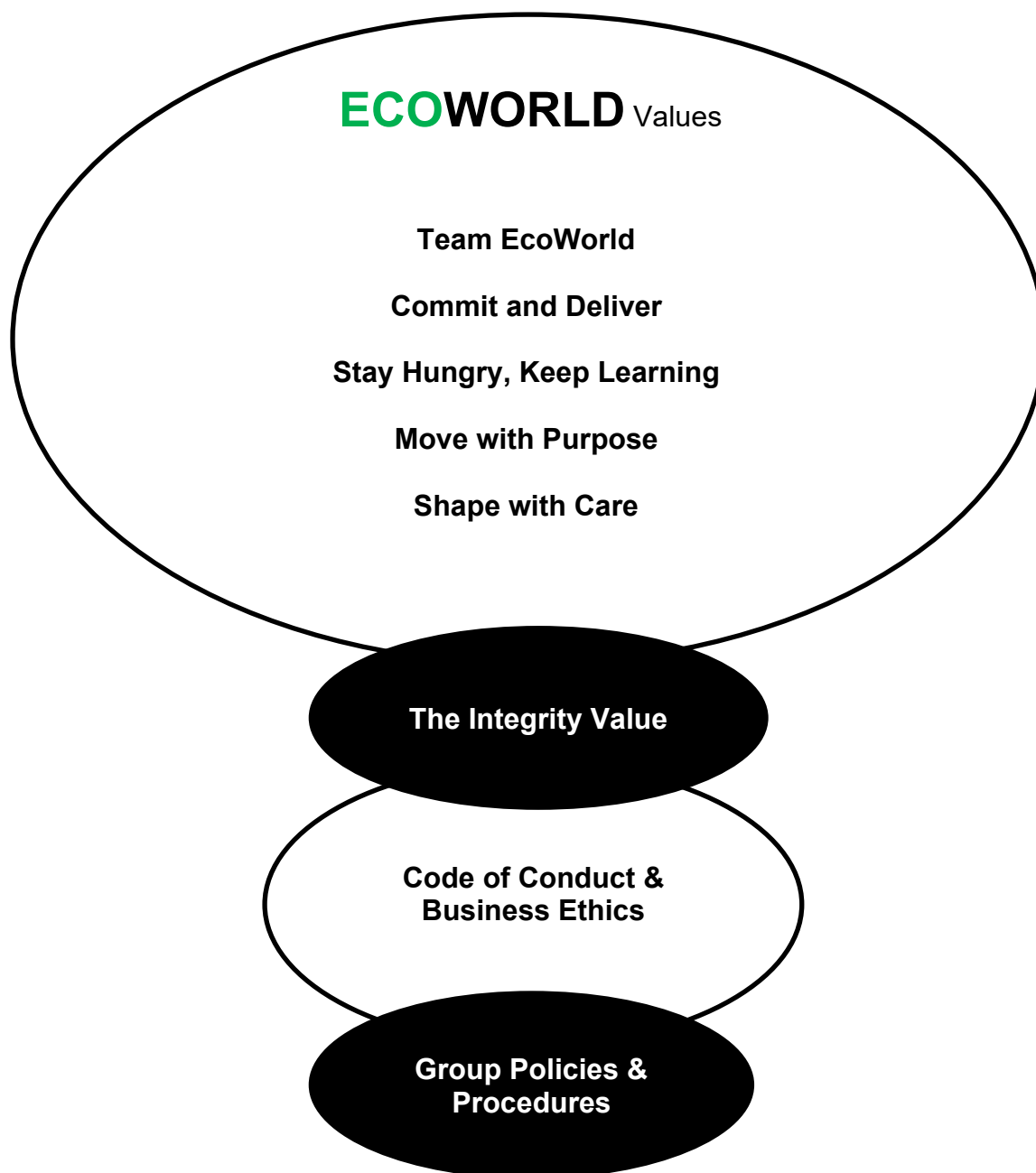
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The Link Between EcoWorld's Guiding Values and Code of Conduct & Business Ethics

This diagram illustrates how this Code links to EcoWorld's Guiding Values and EcoWorld's Group policies and procedures. This means it has to be read in conjunction with these policies and procedures.



Fundamentally, all employees shall conduct themselves professionally following principles of fair play, based on agreed contractual obligations with third parties. The interests of EcoWorld shall take precedence over those of the employee and other third parties. As a matter of principle, all employees are not to place themselves in a position where their professionalism and integrity may be compromised.

1. Responsibility and Accountability

1.1. Employees

All employees are to comply with this Code. Ignorance of the existence of this Code will not be accepted as an excuse for its breach. Disciplinary action will be initiated against those who violate this Code. EcoWorld will require all employees to declare that they have read and will abide by this Code, and it is the responsibility of the employees to keep themselves abreast of the latest updates of this Code from time to time.

EcoWorld shall provide Code of Conduct and Business Ethics induction training to new employees and periodic refresher training to employees and other relevant personnel, as determined by EcoWorld. Employees are required to complete the applicable training and acknowledgement within the timeframe prescribed by EcoWorld. Completion and acknowledgement records shall be maintained by People Solutions or such other function designated by EcoWorld.

1.2. Managers and Business Unit Leaders

Managers and Business Unit Leaders must lead by example and take reasonable steps to promote ethical conduct, prevent, detect and respond to misconduct within their areas of responsibility, reinforce speak-up channels and escalate potential breaches promptly. Refer to No. 14 Getting Help section.

1.3. Vendors, Suppliers and Contractors

EcoWorld expects all vendors, suppliers, contractors, subcontractors, consultants, agents, representatives and service providers performing work or services for or on behalf of EcoWorld to comply with this Code in their dealings with EcoWorld. Where appropriate, such compliance shall be incorporated as a contractual condition of engagement.

The selection of these parties must be based on their track record, the quality of their products and services, integrity and reasonable market pricing, following the applicable procurement and tendering processes.

Our relationships with these parties must remain professional to preserve independence and objectivity in business judgment. EcoWorld may conduct risk-

based due diligence, require declarations, audit compliance and take appropriate remedial action, including suspension or termination, in the event of a material breach.

1.4. Interpretation of This Code

For purposes of this Code:

“Manager” means an employee formally appointed to a managerial or supervisory role and assigned responsibility for directing, supervising or managing the work, performance or conduct of one or more employees, regardless of whether the employee’s job title contains the word “Manager”, and includes any person formally appointed to act in that capacity.

“Immediate Manager” means the Manager to whom an employee directly reports under EcoWorld’s approved organisational structure or other formally approved reporting arrangement.

“Business Unit Leader” means the individual formally appointed or designated by EcoWorld as having overall accountability for a Business Unit, regardless of job title, and includes any person formally appointed to act in that capacity. Membership of a Business Unit leadership team alone does not constitute such designation.

This Code cannot anticipate every situation that may arise in today’s complex and dynamic business environment. Hence, where relevant, this Code must be read in conjunction with EcoWorld’s Anti-Bribery and Anti-Corruption Policy (**“ABC Policy”**) and other relevant prevailing policies and procedures. EcoWorld’s anti-bribery and anti-corruption controls, including this Code and the ABC Policy, form part of EcoWorld’s controls for preventing corruption, including risks arising from employees and associated persons under the Malaysian Anti-Corruption Commission Act 2009, as amended from time to time.

Where provisions in this Code are in conflict or inconsistent with any applicable laws or EcoWorld’s policy, the stricter provisions will prevail. Where this Code is issued in more than one language, and there is any inconsistency, the English version shall prevail unless otherwise determined by EcoWorld’s authorised approving body. In case of uncertainty, seek help and clarification before taking action. Refer to No. 14 Getting Help section.

2. EcoWorld and Its People

2.1. EcoWorld’s Commitment

2.1.1. EcoWorld is committed to treating everyone with respect and dignity, valuing individual and cultural differences. EcoWorld empowers its people to use

individual and collective capabilities to deliver quality products and services both internally and externally.

- 2.1.2. EcoWorld is also committed to the wellbeing of its people by providing a conducive environment that is free from discrimination, harassment, bullying, victimisation and sexual harassment, and by conducting its business in compliance with applicable regulatory requirements.
- 2.1.3. Complaints of sexual harassment shall be handled in accordance with and in compliance with applicable law, EcoWorld's HR policies and prescribed internal procedures.
- 2.1.4. EcoWorld is committed to upholding a politics-free work environment, and therefore it strictly prohibits employees from practising office politics. Any employee who is found to have violated this may face severe disciplinary actions.
- 2.1.5. EcoWorld also seeks to fulfil its corporate social responsibility through activities undertaken by employees and the EcoWorld Foundation.

2.2. People's Commitment

- 2.2.1. All employees are expected to treat everyone with respect and dignity by valuing individual and cultural differences and gender diversity. Verbal or physical abuse, threats, violence, intimidation, harassment, bullying, discrimination, victimisation and retaliation are prohibited. Employees must promptly report any such conduct that they experience or reasonably suspect, and must cooperate truthfully in any investigation.
- 2.2.2. All employees are expected to preserve EcoWorld's brand and reputation and exercise due care in representing the Company.
- 2.2.3. All employees are personally responsible for adhering to the ethical standards and legal requirements that apply to their job function.
- 2.2.4. All employees are expected to refrain from practising office politics.

Examples of office politics include but are not limited to the following:

- a) informal groups which create conflicts that pollute a healthy working environment;
- b) instigate or influence others to go against the Company's direction or policies;
- c) stepping over others for own interest or career advancement;

- d) backstab or badmouth others to strengthen own position; and
- e) pursue a personal agenda which is detrimental to the Company.

3. Policies and Procedures

- 3.1. Company policies and procedures are implemented to achieve business objectives through effective and efficient operations. Therefore, all policies and procedures must be strictly adhered to. Failure to observe these policies and procedures may result in disciplinary action.
- 3.2. Managers and Business Unit Leaders should exercise reasonable care to ensure that effective systems of business controls are put in place to ensure:
 - 3.2.1. appropriate authority and responsibility are assigned to individuals;
 - 3.2.2. proper authorisation of transactions;
 - 3.2.3. accurate, complete, timely and non-misleading business and financial records are created, approved and maintained in accordance with applicable laws and regulations, EcoWorld policies and approved retention and disposal requirements;
 - 3.2.4. disclosure of information is on a need-to-know basis; and
 - 3.2.5. adequate segregation of duties and to avoid conflict of interest.

If an employee requires further clarification or views any policies or procedures to be inappropriate or outdated, they may discuss their concerns with their immediate supervisors.

4. Confidential, Proprietary and Sensitive Information

- 4.1. Employees are prohibited from disclosing any confidential, proprietary and sensitive information of EcoWorld to family, friends and any third parties unless otherwise authorised by the Company or required by law. Examples of such information include but are not limited to trade secrets, financial and business forecasts, competitive bids, business acquisitions and any information that may affect the Company's business and share price. Information of such nature should remain confidential until it is in the public domain.
- 4.2. Those who have left the Company are expected to maintain confidentiality of proprietary and sensitive information acquired in the course of employment with EcoWorld.

- 4.3. All queries from the media or third parties about the Company's business must be directed to Investor Relations / Corporate Communication for a consistent and professional approach in the handling of such matters.
- 4.4. Insider trading is illegal by law. It can take many forms. This includes the use of or disclosure of price-sensitive information for personal benefit or for the benefit of others. Employees holding positions which allow access to price sensitive information should observe the company laws, Securities Commission regulations, Bursa Malaysia Securities Berhad and other applicable laws in respect of trading in the securities of the Company.
- 4.5. A non-disclosure agreement should be signed by vendors or any third party who may have access to confidential and proprietary information to protect the interest of EcoWorld.
- 4.6. Personal Data Protection
 - 4.6.1. Employees shall process personal data lawfully, fairly and only for authorised EcoWorld purposes, in accordance with the Personal Data Protection Act 2010, as amended from time to time including the Personal Data Protection (Amendment) Act 2024, and EcoWorld's Data Protection / Privacy Policy. Personal data includes, but is not limited to, customer, employee, purchaser, vendor, and business contact information, including but not limited to NRIC, contact, financial, transaction, and other identifiable information.
 - 4.6.2. Employees shall not access, use, download, copy, disclose, transfer or retain personal data for personal purposes or outside approved systems. Any suspected loss, unauthorised access, disclosure, misuse or breach of personal data shall be reported immediately to the designated Data Protection Officer / Privacy Officer and IT Security in accordance with EcoWorld's data breach response procedure.

5. Assets, Properties and Facilities

- 5.1. Employees are expected to exercise reasonable care to safeguard EcoWorld's assets to avoid any loss, damage, misuse or theft. Employees will be fully liable for all losses or damages incurred to the said equipment arising from their dishonest act, misconduct or negligence, including without limitation loss of the said equipment from an unattended vehicle and further agree to reimburse the Company for the full replacement cost of the said equipment based on the purchase price at the time of purchase if it is stolen, lost or damaged.
- 5.2. EcoWorld will provide internet and e-mail access to employees who need such facilities. Such facilities are primarily for business purposes.

- 5.3. Employees with internet access should not use such network access to engage in illegal activities or any non-professional conduct or any other activity which may bring disrepute to EcoWorld.
- 5.4. Employees are expected to protect the intellectual property rights of EcoWorld and ensure compliance with applicable laws and regulations. This includes EcoWorld's name, logo, taglines and innovations. Any intellectual property created by the employees in the performance of job responsibilities belongs to EcoWorld.

5.5. Technology, Cybersecurity and Acceptable Use

- 5.5.1. Employees must protect EcoWorld systems, devices, networks, user accounts and data from unauthorised access, loss or misuse. They must comply with IT requirements from time to time on passwords, multi-factor authentication, device security, remote working, software installation, email and internet use.
- 5.5.2. Employees must not use personal email accounts, personal cloud storage, unauthorised devices or unapproved software platforms to store, transmit or process EcoWorld information unless approval is obtained from IT and the relevant information owner. Suspected phishing, cyber incidents, data leakage, lost devices, unauthorised access or system misuse must be reported immediately to IT Security through the approved reporting channel.

5.6. Artificial Intelligence and Automated Tools

- 5.6.1. EcoWorld embraces the responsible adoption of Artificial Intelligence (AI) and automation to enhance the way we work. Employees are encouraged to explore, trial and use AI tools, provided this is done within control parameters established by EcoWorld and as updated from time to time by the Chief Digital Officer (CDO). An AI tool may only be used for EcoWorld work where:
 - a) its use has received the concurrence of the Chief Digital Officer (CDO);
 - b) Digital Technology Services (DTS) has confirmed that it meets the applicable information security, cybersecurity and data protection requirements; and
 - c) it is used in accordance with EcoWorld's legal, business and other applicable requirements.
- 5.6.2. Employees shall not input any confidential information, personal data, customer data, financial information, contracts, designs, project information and/or any other non-public EcoWorld information into public AI tools or AI tools that do not meet the requirements under Clause 5.6.1. While AI may support or automate aspects of work, employees remain responsible for

exercising appropriate human judgement and oversight before and when using or relying on AI-generated outputs.

Employees remain fully responsible for the accuracy, confidentiality, intellectual property compliance and appropriateness of any AI-assisted output they use or rely on, and for any decision made based on such output. Where an approved AI tool is permitted to perform automated actions or decisions on EcoWorld's behalf, the relevant employees remain accountable for ensuring that the tool operates within the approved authority limits, business rules and controls, including the security controls established by DTS.

- 5.6.3. Detailed requirements, including the applicable do's and don'ts, are set out in the EcoWorld AI Acceptable Use Guidelines, as updated from time to time. Employees should seek guidance from DTS where they are uncertain whether a proposed use complies with these requirements. Failure to comply with this section may result in disciplinary action.
- 5.6.4. Reliance on an AI-generated output does not, by itself, excuse an employee from responsibility for errors, omissions, or non-compliance arising from that output.

6. Restrictions Upon Leaving EcoWorld

To prevent the appearance of impropriety, unfair competitive advantage, or misuse of EcoWorld information, all employees and other personnel are subject to applicable post-employment obligations upon resignation, termination, or cessation of engagement. They shall return all EcoWorld assets, documents, records, devices, access cards and information in their possession or control. They shall not retain copies of EcoWorld information except where expressly authorised by EcoWorld or required by law. Post-employment restrictions, including confidentiality, intellectual property, and conflict management, shall be governed by the applicable employment contract, appointment letter, engagement terms, and prevailing law.

7. Social Media

7.1. Definition

Social media refers to internet-based and digital platforms used for publishing, sharing, communicating or discussing information, opinions, images, videos or other content. This includes, but is not limited to, LinkedIn, Facebook, Instagram, Instagram Reels, TikTok, YouTube, YouTube Shorts, blogs, online forums, podcasts, livestreaming platforms, messaging platforms such as WhatsApp, Telegram and WeChat, collaboration platforms and any future digital platform that

enables publication, sharing or discussion of information. These guidelines apply regardless of platform name, format or technology.

7.2. Guidelines for Authorised Employees

7.2.1. Authorisation from the Chief Development Officer/Senior Head is required for sharing and responding on behalf of EcoWorld on social media.

7.2.2. Authorised employees must:

- a) disclose and comment only on information classified as public domain information;
- b) ensure that all content published is accurate and not misleading and complies with all relevant Company policies and other relevant requirements;
- c) ensure they are not the first to make an announcement, unless specifically permitted to do so;
- d) comment only on their area of expertise and authority;
- e) ensure comments are respectful of the community in which they are interacting online;
- f) adhere to the terms of use in the social media platform or website;
- g) comply with all relevant laws including copyright, privacy, defamation, contempt of court, discrimination and harassment laws, and the Company's Privacy Policy;
- h) not post or respond to materials that are offensive, obscene, defamatory, threatening, harassing, oppressive, discriminatory, hateful, racist, sexist; or material that infringes on any laws, constitutes a contempt of court, breaches a court order, or is otherwise unlawful;
- i) not use or disclose any confidential or secure information; and
- j) not comment on or post any material that might otherwise cause damage to the Company's reputation or bring into disrepute.

7.3. Guidelines for Other Employees

7.3.1. Other employees should also be aware of and understand the potential risks and damages to the Company that may occur, either directly or indirectly, in their personal use of social media. Employees must adhere to the guidelines below:

- a) expressly state that stated views are personal and are not representative of the Company;
- b) behave politely and respectfully;
- c) not imply that you are authorised to speak as a representative of the Company nor give the impression that the views expressed are those of the Company's;
- d) not use the identity or likeness of another employee;

- e) not use the Company's email address or logos or insignia that may give the impression of official support or endorsement of your personal comment;
- f) not use or disclose any confidential information or personal information obtained in your capacity as an employee of EcoWorld;
- g) not post material that is, or might be construed as threatening, harassing, bullying or discriminatory towards another employee of the Company;
- h) not comment or post any material that might otherwise cause damage to the Company's reputation or bring into disrepute; and
- i) not respond to customers' complaints on EcoWorld's Facebook page or other social media platforms administered by EcoWorld if you are not authorised to do so.

8. EcoWorld and Its Customers

8.1. External Customers

- 8.1.1. EcoWorld is committed to delivering quality products and services to all customers. Employees are expected to treat customers professionally in all business transactions and to provide high standards of customer care to address any complaints.

EcoWorld is committed to protecting the privacy of its customers' personal information. Customer personal data must be handled in accordance with the Personal Data Protection Act 2010, as amended from time to time, EcoWorld's Privacy Policy, data retention requirements and approved customer communication procedures. Employees must not use customer data for personal purposes, unauthorised marketing or disclosure to third parties, unless authorised by EcoWorld and permitted by applicable law.

- 8.1.2. All corporate gifts or festive gifts presented to customers must comply with the ABC Policy.

8.2. Internal Customers

- 8.2.1. EcoWorld is committed to treating all of our internal customers with respect and dignity by demonstrating a high level of professionalism.
- 8.2.2. EcoWorld will not condone any forms or acts of harassment, including verbal, physical, visual or sexual harassment, or any conduct that creates a hostile work environment. Any employee who believes that they have been subjected to harassment may lodge a report with People Strategy & Acquisition, People Solutions or EcoWorld's Whistleblowing Policy channels, including whistleblow_ewdgb@ecoworld.my, which will review the case and consider the appropriate course of action in accordance with the

applicable HR policy, statutory requirements and prescribed internal procedures. Retaliation against a complainant, witness or investigator is strictly prohibited.

8.2.3. All employees are expected to nurture a conducive environment that promotes the culture of working together and having pride in what we do.

8.2.4. Managers and Business Unit Leaders are to ensure that achievements are recognised and that employees are allowed to realise their full potential.

9. EcoWorld and Its Suppliers, Vendors, Contractors and Public Officials

9.1. Business Dealings With Others

9.1.1. To protect the interest of EcoWorld:

- (a) all business decisions are taken based on objective and independent judgment in the best interest of the Company, and must not be motivated by personal considerations or relationships, whether real or perceived. Dealings with public officials must be conducted transparently, in accordance with the ABC Policy, applicable approval limits and relevant laws. Extra care must be taken in relation to gifts, hospitality, donations, sponsorships, facilitation requests, permits, approvals, inspections and any interaction that may create a real or perceived improper advantage;
- (b) all business negotiations are on an arm's-length basis, and EcoWorld adopts the principle of integrity and fairness in its business dealings and expects the other parties to reciprocate;
- (c) employees are prohibited from soliciting, offering, promising, giving or receiving any form of payments, gifts, favours, and entertainment that may compromise the integrity, professional judgment or assessment of product, services, price and performance of our vendors, suppliers/contractors; and
- (d) solicitation and acceptance of bribes in any form or manner are serious misconducts which may result in termination of employment.

9.2. Conflict of Interest

9.2.1. Conflict of interest arises where there is a personal interest that can be considered to have potential interference with objectivity in performing duties or exercising judgment on behalf of EcoWorld.

9.2.2. Conflict of interest is deemed to exist when an employee, by virtue of holding a particular position, causes them to obtain an improper gain or advantage, in which such gain or advantage adversely affects EcoWorld's interest.

- 9.2.3. Employees should declare to their Managers or Business Unit Leaders immediately upon becoming aware of a conflict of interest, whether real or perceived, involving themselves, other employees or a third party. Such declarations must be documented through the approved declaration form, system or official email record, and retained in a conflict of interest register or other designated record repository. The relevant Manager or Business Unit Leader must escalate the declaration to People Solutions for review and mitigation. Employees must update their declaration if circumstances change.

9.3. Receiving and Giving Business Courtesy

- 9.3.1. As a rule of thumb, no employee should accept gifts, entertainment or hospitality given by third parties who have business dealings with EcoWorld as this may compromise our integrity or affect our professional judgment in discharging our full responsibilities to the Company. This includes items such as meals and beverages, travel and accommodation, tickets to sporting and cultural events, discounts not available to the general public, etc.
- 9.3.2. Under no circumstances is it acceptable to offer, give, solicit, receive, request, promise, authorise or provide any form of bribe, kickback, facilitation payment, gratuity or improper advantage. This applies to all Company transactions, even where the practice is widely considered as “a way of doing business”, and regardless of whether it involves persons in the public or private sectors. Employees and associated persons must comply with the Malaysian Anti-Corruption Commission Act 2009, including corporate liability principles under Section 17A, and EcoWorld’s ABC Policy. Any improper request, offer, promise, payment or benefit must be refused and reported promptly through the approved reporting channel.
- 9.3.3. Exception to 9.3.1 above applies to:
- a) gifts which fulfil all the conditions and requirements set out in the ABC Policy;
 - b) occasional and modest entertainment in the normal course of business;
 - c) occasional and appropriate level of corporate hospitality; and
 - d) any other circumstances allowed under the ABC Policy.

9.4. Dealings with Contractors, Consultants and Suppliers

- 9.4.1. Employees must maintain integrity and transparency in all dealings with contractors, consultants and suppliers and avoid any actual or perceived conflict of interest.

- 9.4.2. Genuine business meals after meetings (e.g. site meetings) are permitted, provided they involve the same meeting participants and the cost is shared or paid on a rotational basis.
- 9.4.3. Employees must not accept any other form of entertainment or hospitality from contractors, consultants or suppliers unless prior approval is obtained from the CDO, DCEO or CEO.
- 9.4.4. All gifts received must be declared and recorded in the Company's Gift register as per the Anti-Bribery and Anti-Corruption Policy.
- 9.4.5. Employees must disclose to the CDO, DCEO or CEO of any personal, family or other relationship with a contractor, consultant, supplier or related party. Such disclosure is made solely for transparency and conflict management purposes and will not, by itself, affect the Company's appointment of the disclosed party and/or the employee's appraisal.

9.5. Purchasing and Procurement

9.5.1. Acting in the best interest of EcoWorld

- a) All procurement and purchasing decisions should be based solely on the Company's best interest, covering product or services suitability, price, delivery and quality, and in accordance with the relevant standard operating procedures. Due consideration should be given to:
 - i. treating all suppliers, contractors or service providers fairly;
 - ii. confidentiality by ensuring that no information is disclosed during the bidding process;
 - iii. more than one (1) supplier, service provider or contractor;
 - iv. checks and balances amongst employees; and
 - v. other operational considerations as advised by the respective business units.
- b) All procurement or purchasing agreements should document services or products to be provided with specific deliverable milestones to enable independent verification when the need arises.

9.5.2. Commitment on behalf of EcoWorld

- a) All monetary commitments should be approved according to the approved limits of authority.
- b) Authorisation and approval of the budget or operating plan is not equivalent to authorisation of financial expenditure. Approval for the expenditure is still required even though it is budgeted for.
- c) No employee is allowed to:

- i. approve own claims or expenses for payment;
- ii. approve a requisition, place an order, receive goods and approve an invoice for payment by themselves; and
- iii. break down the total value of the procurement into multiple purchase requisitions to evade limits established by management.

9.5.3. Business Unit Leaders can only delegate their limits of authority to their subordinates. Such delegation must be task specific, and the Business Unit Leaders remain accountable for the delegated task.

9.5.4. Commitment by Resigned Employees and Consultants

An employee who is serving resignation notice, or is a consultant or part-time/temporary employee, is not allowed to make any commitments on behalf of the Company, unless written permission is given.

9.6. Anti-Money Laundering and Counter-Terrorism Financing

9.6.1. EcoWorld is committed to complying with applicable anti-money laundering, counter-terrorism financing and counter-proliferation financing laws, including AMLA.

9.6.2. Employees shall not knowingly facilitate suspicious property transactions, nominee arrangements, false identities, unusual payment structures, unexplained third-party payments or any transaction intended to conceal the source or ownership of funds. Suspicious activity shall be escalated to the designated compliance channel before proceeding.

9.7. Fair Competition

Employees shall not enter into or facilitate anti-competitive arrangements, including price-fixing, bid-rigging, market sharing, customer allocation, output restriction or improper exchange of competitively sensitive information with competitors, suppliers or contractors. Any competition concern must be referred to the Legal Department before engagement continues.

10. Community and Society

10.1. EcoWorld is committed to making a positive difference in society. We always have before ourselves the goal of contributing to the improvement of the quality of life of our community.

10.2. EcoWorld and its employees shall be mindful of the consequences of EcoWorld's conduct on the community, economy and society. They shall support responsible business practices, corporate social responsibility, human rights and labour

standards. EcoWorld will not tolerate forced labour, child labour, human trafficking, abusive recruitment practices, unlawful withholding of documents, unsafe or degrading working conditions, or serious labour abuses in its operations or supply chain. Employees must report suspected violations through the appropriate reporting channel.

11. The Environment

11.1. Sustainability

Employees are expected to support EcoWorld's Sustainability Framework, sustainability reporting commitments and environmental objectives in their daily work, including responsible resource use, waste management, climate-related awareness and accurate sustainability data reporting.

11.2. Health, Safety and Environment

EcoWorld is committed to complying with the Occupational Safety and Health Act 1994 and applicable environmental, safety and site requirements. Employees and contractors must comply with safe work practices, site rules, personal protective equipment requirements and instructions issued by authorised HSE personnel.

All employees and contractors must promptly report hazards, unsafe acts, near misses, injuries, environmental incidents and activities that may compromise site safety or environmental protection. Work must be stopped or escalated where there is an imminent risk of serious harm.

12. Ethics Checklist

12.1. When making a decision or following a directive, ask ourselves:

- 12.1.1. Does my action comply with the spirit of EcoWorld's policy and the applicable laws?
- 12.1.2. Is my behaviour consistent with EcoWorld's guiding values and its ethical standards?
- 12.1.3. Does my decision/action reflect the right thing to do?
- 12.1.4. Is my decision/action being driven by responsible professional judgment?
- 12.1.5. Would I feel confident that I could explain my decision if it were made public?
- 12.1.6. Have I considered relevant legal, ethical and business risks, including data privacy, cybersecurity, AI use, health and safety, environmental impact, fair competition, anti-money laundering, human rights, public official dealings, financial records and reputational risk, and sought guidance from the right function where needed?

12.2. Embracing good practices

- 12.2.1. Keep abreast of the ethical standards and legal requirements that apply to your job activities or areas of specialisation.
- 12.2.2. Initiate discussions during departmental meetings on issues about this Code.
- 12.2.3. Know who to consult if you are unsure of what is the right thing to do.
- 12.2.4. Speak up if you have a genuine concern.
- 12.2.5. Get help if you are in doubt.

13. Compliance with This Code

13.1. Those who violate this Code, regardless of position or title, may be subjected to disciplinary action, including termination of employment. The following are some examples of conduct that may result in disciplinary action:

- 13.1.1. violating and/or instigating others to violate laws or EcoWorld's Code of Conduct and Business Ethics;
- 13.1.2. failing to report known or suspected violations of laws and this Code; and
- 13.1.3. retaliating against others for reporting a concern or violation.
- 13.1.4. failing to complete mandatory Code, ABC, data protection, cybersecurity, safety, whistleblowing or other compliance training within the required timeframe;
- 13.1.5. misusing Company systems, personal data, confidential information, AI tools, financial records or other EcoWorld assets; and
- 13.1.6. failing to cooperate honestly in an investigation, concealing relevant information or obstructing an investigation.

14. Getting Help

14.1. Seek advice when you are unsure of an appropriate legal or ethical course of action. Some examples include:

- 14.1.1. applicable policies seem difficult to understand/interpret;
- 14.1.2. you have limited experience in dealing with the subject matter; and
- 14.1.3. differences between opinions make the course of action unclear.

14.2. Select an appropriate avenue for getting help given the issue at hand. A good place to start is your immediate supervisor. If it remains unresolved, escalate it to your Chief Development Officer, Senior Head, People Solutions, Deputy Chief Executive Officer, or Chief Executive Officer.

15. Reporting Concerns

- 15.1. You are encouraged to report a genuine concern without fear of retaliation. Reports may be made through EcoWorld's Whistleblowing Policy channels, including whistleblow_ewdgb@ecoworld.my, and may be made anonymously where the reporting channel permits and sufficient information is provided for review. EcoWorld will maintain confidentiality to the fullest extent reasonably practicable and will prohibit retaliation against any person who raises a concern in good faith, assists in an investigation or refuses to participate in misconduct. Protected disclosures may also be made to relevant enforcement authorities in accordance with the Whistleblower Protection Act 2010 and other applicable laws.
- 15.2. Malicious or defamatory reporting or purposeful false reporting, however, is a breach of this Code and may result in disciplinary proceedings.

16. Governance and Review

- 16.1. People Solutions shall own this Code, reviewed periodically and subject to change from time to time upon material regulatory, organisational or risk changes, and approved by the Deputy CEO or Chief Executive Officer.
- 16.2. The document owner shall maintain the version history, approval record, communication plan, training plan and list of related policies. Material amendments shall be communicated to employees and relevant business partners, and employees may be required to acknowledge the updated Code.