BLD PLANTATION BHD. (562199-A)

CODE OF BUSINESS CONDUCT AND ETHICS

1. Our Vision

To be a successful, innovative and responsible corporation, having a leading role in the agricultural industry producing quality products and services.

2. Our Mission

To sustain growth through effective services and prudent cost competitive application of resources exceeding the expectation of our customers and shareholders.

3. Our Core Values

- Commitment
- Discipline
- Integrity
- Professionalism
- Loyalty
- Diligence
- Excellence

BLD Plantation Bhd ("BLDP" or "the Company") is proud to uphold the principle of our vision and core values at all times. This results a framework of Code of Conduct and Ethics ("the Code") for the Directors and employees and it extends to our subsidiaries. The Directors and employees whom we shall refer to as "Officers" are required to exercise and comply with the Code.

4. Code of Conduct and Ethics

a) Compliance with Applicable Laws

BLDP is committed to operate business in an ethical and reliable manner, and in compliance with all applicable laws, rules and regulations.

b) Inside Information and Securities Trading

Officers are forbidden to trade in the Company's securities affected by or on behalf of a person with knowledge relevant but non-public price sensitive information regarding BLDP as this is an illegal conduct. It may subject to the criminal and civil actions under Malaysian Law which includes Capital Markets and Services Act 2007.

c) Integrity and Professionalism

Officers shall present themselves with the utmost degree of integrity and professionalism at all times either in the workplace or any other location while on the Company's business.

d) Equal Opportunity and Non-discrimination

BLDP acknowledges the principle of equality and non-discrimination in diverse workforce through recruitment, rewards and recognition, career development, training, and respecting the differences in culture, gender, race and religion.

e) Safe and Healthy Workplace

BLDP commits in providing a safe, secure and healthy working environment to all Officers by enforcing adequate occupational safety and health practices corresponding with the nature of BLDP's business activities.

f) Harassment, Threat and Violence

BLDP strives to create a work environment where the Officers are treated with respect and free from any form of threat, harassment, intimidation, violence or any other misconduct behaviour including sexual harassment.

g) Conflict of Interest

It is an obligation for Officers to act in the best interest of BLDP at all times. Officers must not mistreat their position or knowledge gained directly or indirectly in the course of their duties and responsibilities or employment for private or individual advantage.

h) Data Integrity and Protection

No Officers has any right to disclose any information at any time to a third party relating to any business matters of BLDP.

i) Protection and Use of Company Assets and Resources

Officers are accountable to safeguard and make proper and efficient use of the Company assets and resources at all times in compliance with all applicable laws.

j) Proprietary and Confidential Information

Officers are obliged to protect BLDP's private and confidential information from unlawful disclosure or practice. Officers are also required to protect confidential information of third party which Officers have access to in the course of their work.

5. <u>Violation of Code of Conduct & Ethics</u>

Employees shall report the known or suspected illegal or unethical behaviour to his/her superior, Head of Department or Head of Human Resources. The Company's Executive Directors and senior management shall promptly report any known or suspected violations of this Code to the Board.

6. Review and Waive

The Code may be reviewed and waived periodically by the Board in accordance with the requirements of BLDP and other provisions of applicable regulations of other regulatory entities.