

Meta Bright Group Berhad

(formerly known as Eastland Equity Bhd.)

Corporate Code Of Conduct And Ethics

1.0 OBJECTIVE

This Corporate Code of Conduct and Ethics aims to:

- i. Communicate and guide stakeholders on the ethical behaviours and values expected from the Director and Senior Management of the Group; and
- ii. Facilitate measurement and monitoring of their performance against these values.

2.0 OUR VALUES

At Meta Bright, we:

- i. Ensure that our products and services are produced and delivered ethically and lawfully, and the information provided in our promotions and advertisements are factually accurate;
- ii. Uphold sound business ethics and comply with laws in conducting our business;
- iii. Create a safe, healthy and secured workplace free from any form of danger, discrimination and sexual harassment. Merit and performance shall be duly recognized and be rewarded with fair remuneration and career advancement opportunity;
- iv. Embrace social equity and diversity, and support good causes and charities; and
- v. Protect the environment and natural resources and ensure their sustainability.

3.0 OUR INTOLERANCE

We do not tolerate insider trading, money laundering, corruption, conflicts of interest transactions and abuse of power. No Directors, officers, and employees shall:

- (a) Enter into any transaction in the securities of the Company while they possess non-public information about that Company or recommend others to transact in the securities of the Company based on insider information;

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- (b) Assist money laundering activities which may include, but are not limited to accepting an unusual amount of payment in cash, other benefits in kind or payments made by or to third parties who are not parties to the contract; or payments made in currencies that differ from invoices;
- (c) Solicit gifts or favours in connection with their official duties; or accepting gifts which would create or give rise to the perception of impropriety or biases that would damage the reputation of the Group;
- (d) Provide gifts, bribes or benefits to influence other stakeholders to obtain or retain business or secure an unfair advantage in any business transaction or any such offences as stipulated in the Company's Anti Bribery and Corruption Policy;
- (e) Take part in deciding any transaction, contract or proposed contract or arrangement in which they are interested, directly or indirectly; and
- (f) Use the power conferred to their position by imposing their will over a subordinate, for gaining benefits or for a particular objective that is usually in violation of laws, rules and regulations.

4.0 BOARD'S RESPONSIBILITY

To uphold this Code, the Board shall ensure that:

- a. Adequate procedures and framework are implemented to support, promote and strengthen the awareness of and compliance with this Code;
- b. A confidential whistleblowing communication channel is provided for stakeholders to report irregularities;
- c. The values of the Code are integrated into the Board and management decision-making process;
- d. Management performance evaluation is assessed against the provisions of this Code; and
- e. Appropriate disciplinary action is taken against wrongdoers who have violated this Code.

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5.0 MANAGEMENT'S RESPONSIBILITY

Management should make this Code readily available and communicate it to all employees, and publish it on the Company's website.

In making operational and business decisions, Management is responsible to the Board in observing this Code's provisions. Management shall ensure their action is consistent with the spirit of this Code and promote sound ethics in their interaction with all stakeholders.

6.0 DOCUMENTATION

This Code shall be embedded in the Employee Handbook. All Board Members and Key Senior Management must read and familiarise themselves with this Code and acknowledge their understanding and compliance with the Code as and when there are update and amendments.

7.0 REPORTING OF VIOLATIONS

According to the Group's whistleblowing policy and procedure, stakeholders who know of or suspect any violation of this Code are strongly encouraged to report the incidence by emailing mbgb@whistleblower.com.my.