

RIMBUNAN SAWIT BERHAD (691393-U)

CODE OF ETHICS AND CONDUCT

INTRODUCTION

To cultivate good corporate governance practices, the Board, the Management and employees of Rimbunan Sawit Berhad (“RSB” or the “Company”) and its subsidiaries (collectively referred to as the “Group”) have made a commitment to conduct the businesses of the Group in an ethical manner and to promote sensible standards of professionalism and archetypal corporate conducts. This Code of Ethics and Conduct (the “Code”) sets out the principles and standards of business ethics and conduct of the Group.

OBJECTIVE

The objective of the Code is to aid the Directors and Employees in defining ethical standards and conduct at work. For all intents and purposes, all Directors and Employees shall always observe and ensure compliance with all applicable laws, rules and regulations to which they are bound to observe in the performance of their duties.

CORE AREAS OF ETHICS AND CONDUCT

1. Conflict of Interest

The Directors and Employees refrain themselves from involving into the situation where there is real or apparent conflict of interest between them as individuals and the interest of the Group.

2. Confidential Information

The Directors and Employees shall exercise caution and due care to safeguard any information which is acquired in the course of their employment, that is confidential and sensitive to the Group, and strictly prohibited to disclose to any person, unless the disclosure is duly authorized or legally mandated.

3. Insider Information and Securities Trading

The Directors and Employees are prohibited to utilize the insider information and securities trading for the benefits of their own and as well the benefits of the parties who are related to them.

4. Protection of Assets and Funds

The Directors and Employees must protect the assets and funds of the Group to ensure availability for legitimate business purposes and not used for personal gain.

5. Business Records and Control

The Directors and Employees shall ensure that all business records should conform to acceptable and applicable accounting principles and to all applicable laws and regulations, and no unauthorized, false, improper or misleading records or entries shall be made in the books and records of the Group, under any circumstances.

6. Compliance to the Law

The Directors and Employees are expected understand and comply with the laws, rules and regulations that are applicable to their positions and/or work and shall comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions.

7. Personal Gifting

The Directors and Employees are expected not to accept or provide personal gifts, favours, entertainment or services, in cash or kind, that will or will appear to influence objective and fair business decisions

8. Health and Safety

The Group will use its best endeavours to ensure a safe workplace and maintain proper occupational health and safety practices to commensurate with the nature of the Group's businesses and activities.

9. Sexual Harassment

Sexual harassment by any Director or Employee is unacceptable. All such reports and/or complaints shall be treated with strictest confidence.

10. Outside Interest

The Directors and Employees shall not engage in an outside interest that will undermine their performance or bring disrepute to the Group.

11. Fair and Courteous Behavior

All Employees are to treat their fellow Employees fairly and courteously without regard to race, creed, religion, gender, nationality, age or disability, and shall not create any form of discrimination or prejudice in the workplace.

REVIEW OF THE CODE

The Board will monitor compliance with the Code and review the Code regularly to ensure that it continues to remain relevant and appropriate.