

RIVERVIEW RUBBER ESTATES, BERHAD

CODE OF CONDUCT AND ETHICS

STANDARD OF CONDUCT

As the business environment and laws continue to become more complex, a greater demand for reasonable competence amongst company directors has become increasingly important and this has resulted in a need to establish a standard of competence for corporate accountability which include standards of professionalism, and trustworthiness in order to uphold good corporate integrity.

The guiding principles adopted by the Directors are based on moral duty, sincerity, integrity and responsibility. The Directors observe a code of ethics in accordance with that expected from each of their respective professional bodies and the Company Directors' Code of Ethics established by the Companies Commission of Malaysia.

These principles include:

- prohibitions on using their position for personal gain;
- prohibitions on improper business practices;
- a requirement for compliance with all internal approval and authorisation procedures and legal requirements; and
- a requirement to disclose potential conflicts of interest and potential related party contracts.

LAWS & REGULATIONS

As a plantation company with a history of more than 80 years, Riverview ensures that it manages its business, operations and affairs in accordance with the laws and regulations of the jurisdictions in which it operates.

We work with the authorities and other organizations, both directly and indirectly through bodies such as trade associations, in developing regulations which may affect our industry.

SHAREHOLDERS

We conduct our operations in accordance with accepted ethics of good corporate governance and provide timely, regular and reliable information on our activities, structure, financial situation and performance to all shareholders.

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BUSINESS PARTNERS

We are committed towards establishing mutually beneficial relations with our suppliers, customers and contractors. In our dealings, we expect our suppliers and contractors to adhere to business ethics consistent with our own.

COMMUNITY INVOLVEMENT

We strive to be a responsible corporate citizen and as an integral part of society, to fulfil our responsibilities to communities in which we operate.

THE ENVIRONMENT

We are committed to the management of our environmental impact and to the longer-term goal of developing a sustainable business.

INTEGRITY AND CORRUPTION

We do not give or receive whether directly or indirectly bribes or other improper advantages for business or financial gain. Similarly, such unhealthy practices by our employees are not tolerated.

CONFLICTS OF INTERESTS

All directors are to declare, and employees are expected to avoid personal activities and financial interests which would be in conflict with their responsibilities to the Group. Directors and employees must not seek gain for themselves or others through misuse of their positions.

WHISTLE BLOWER POLICY

To reinforce the practice of governance and ethics, we have a whistle blowing policy to provide an avenue for stakeholders and employees to raise genuine concerns internally or report and suspected wrongdoings, this includes fraud, misappropriation of assets, breaches of trusts or law without fear of reprisal.

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WHISTLE BLOWER POLICY (CONT'D.)

Concerns should be raised with the immediate superior; if for any reason this is not possible or inappropriate, the concern should be raised to the Principal Officer as follows:

Name : Mr. Tai Lung Khim
Via Email : whistleblowing@riverview.com.my
Via Mail : *Mark : Strictly Confidential*
Riverview Rubber Estates Berhad
33 (1st Floor)
Jalan Dato' Maharajalela
30000 Ipoh, Perak

In the event where reporting to the Management is a concern, the report should be addressed to the Chairman of the Audit Committee as follows:

Name : En. Mohd. Razali bin Mohd. Amin
Via Email : ac.chairman@riverview.com.my
Via Mail : *Mark : Strictly Confidential*
Riverview Rubber Estates Berhad
33 (1st Floor)
Jalan Dato' Maharajalela
30000 Ipoh, Perak

The above-mentioned procedures protect the whistle blowers against reprisal and harassment. The identity of the whistleblower and the confidentiality of the matters raised are protected under this policy.

This encourages employees, suppliers and other stakeholders to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified.

REVIEW OF CODE

The Board will review this Code from time to time and make the necessary amendments to ensure that they remain consistent with the Board's objective, current laws and practices.