

D & O GREEN TECHNOLOGIES BERHAD
(Company. No: 645371-V)
(Incorporated in Malaysia)

CODE OF ETHICS AND CONDUCT
(Approved by Board on 21 November 2025)

Introduction

The Code of Ethics and Conduct (“the code”) is intended to apply to every employee, customer and vendor of D & O Green Technologies Berhad (“D&O”) and its subsidiaries worldwide. It is established as a standard to ensure that the Group’s working environment and conditions are safe and healthy, workers are treated with respect and dignity, and business operations are conducted ethically.

The principal objective of adopting the code is to ensure that all business activities are in full compliance with the laws, rules and regulations of the country in which it operates. If a law of the country conflicts with a rule or policy set out in this code, affected personnel should comply with the law of the country. Besides, the code encourages affected personnel to go beyond legal compliance and adopt internationally recognised standards in order to advance business ethics and control.

The Group is open to receive input from stakeholders for the continuous development and implementation of the code where the best practices are adopted whenever possible.

Our Value

We uphold the highest standards of integrity, transparency and accountability in the conduct of the group’s business and operations to ensure business sustainability. We are committed to conduct our affairs in an ethical, responsible and transparent manner.

- To Shareholders, creating and enhancing long-term shareholder value
- To Employees, we will strive to recruit and retain capable people, offer them competitive terms and conditions of service, and improve their personal progression through training and development. D&O is committed to provide to all employees a safe, secure, healthy and conducive workplace culture and environment, where the values of mutual and reciprocal respect, trust and confidence are upheld and promoted
- To Customers, we strive to provide products and services that meet their expectation through continuous engagement
- To Business Partners, we will uphold the highest professional and ethical relationship for mutual benefit with our suppliers, contractors, service providers, financial institutions and other entities doing business with us
- To Government, we undertake to comply with all applicable laws and regulations laid down and to participate in projects promulgated by government for industry and social development
- The Group pledges that it will be a responsible corporate citizen wherever it operates and will take into consideration the needs and aspiration of local communities

I. Respecting Others

1) Discrimination

D&O does not encourage any form of discrimination in the workplace or on the job including discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, or marital status in hiring and employment practices such as promotions, rewards, and access to training.

2) Working hours

Studies of business practices clearly link strained workers tend to reduce productivity, increased turnover and increased injury and illness of workers. Workweeks and working hours are not to exceed the maximum set by statutory labour law.

3) Wages and Benefits

To offer pay and benefits that is fair and competitive within each local business and industrial markets the Group are participating in. Compensation paid to workers shall comply with all applicable laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

4) Safety and Health

The Group undertake to ensure the working environments at its operating entities are safe, healthy and environmentally friendly for its employees and business associates.

5) Humane Treatment & Harassment

All forms of harassment and inhumane treatment of workers are strictly prohibited. This includes but not limited to sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, intimidation, and verbal abuse. Threats of such treatment are equally unacceptable and will not be tolerated

6) Communication

The Group promotes continuous two-way communication with its employee to ensure ideas, concern and problems being identified and resolved amicably as a team

7) Continuous Development

The Group strive to identify and satisfy the needs of employees to continuously develop their knowledge, skills and competency for personal development and corporate excellence.

II. Serve Our Customers

1) Integrity

The Group's reputation of having customers its trust for the products and services provided by us are its most valuable asset, and it is the responsibility of the Group, including its business partners, to make sure that the Group continually earn that trust. The Group strive to deliver its products and services with competitive value and quality in equilibrium.

2) Competency

The Group serve its customers with utmost competency and meet appropriate standard of legitimacy and integrity.

3) Assets

It is the Group's commitment to treat all assets belonging to its clients, including intangible, intellectual properties and electronic assets, in a responsible and appropriate manner to the Group's business and only for legal and authorized purposes.

III. Avoiding Conflict of Interest

Conflict of interest arises in any situation in which an individual is in a position to take advantage of his or her role at D&O for his or her personal benefit, including the benefit of his or her family and friends. Conflict of interest can make it difficult for an individual to fulfill his or her duties impartially and correctly and can exist even if it results in no unethical or improper acts. Even the appearance of improper influence in decision-making may be an issue. A conflict of interest will undermine the values of good faith, fidelity, diligence and integrity in the performance of duties and obligations expected from the employee.

All employees, customers and business partners must therefore try to avoid conflicts of interest in the conduct of business.

1) Business Integrity

The highest standards of integrity are to be upheld in all business interactions. Affected personnel shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes). All business dealings should be transparently performed and accurately reflected on records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws and best practices.

2) Bribery and Corruption

The Group complies with the MACC Act 2009, particularly Section 17A on corporate liability, by implementing adequate procedures. Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted. Gifts/benefit other than of token value should generally be refused or consulted with Anti-Bribery & Corruption Committee. The Company's Anti-Bribery & Corruption Policy is available for download from the "Corporate Governance" section of the Company's website at www.do.com.my

3) Disclosure of Information

Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain is unacceptable.

4) Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld. Appropriate means to safeguard customer information must be available.

IV. Preserve Confidentiality and Privacy

Unable to preserve confidentiality will eliminate our competitive advantage, promote unethical business practice and prove costly in other ways. Therefore, upholding highest standard in the preserving confidentiality is one of the Group's responsibilities and extended to ensuring employees, customers and business partners receives such information on "need to know" basis and to observe the confidentiality and privacy of such information.

The Group respects the confidentiality and privacy of our employees, customers, business partners and regulatory bodies with whom we do business and liaise with. Unless authorised, the Group do not use confidential information for personal use, for its sole benefit or to benefit a third party with detrimental effect to the owners. The Group disclose confidential information or personal data only when necessary, and when appropriate level of approval or authorisation has been obtained from concerned party, and/or compelled to do so by legal and regulatory requirements.

V. Safety and Health

The Group undertake to ensure the working environment at its operating entities are being maintained safely, healthy and environmental friendly for its human capital, customers and business partners. 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. Such a commitment in return requires that all Directors and Employees understand and abide by the Group's policies and procedures.

VI. Insider Trading

As a general policy, all our directors and employees are discouraged from engaging in speculative trading (as opposed to investing) in the Company's listed securities, and are reminded to observe the prohibitions imposed on "insiders" in relation to Insider Trading under the Capital Markets and Services Act 2007. The directors and employees in possession of material information or price sensitive information that has not been publicly disclosed should not trade in or deal with the Company's securities or share with anybody.

In addition to this, all Directors and key management personnel, identified and designated as such are required to comply with Bursa Malaysia Securities Berhad's Listing Requirements on Dealings in Listed Securities under Chapter 14 of the Main Market Listing Requirements.

VII. Anti-Money Laundering

It is the Group's fundamental principle that money laundering practice is strictly prohibited within the Group. As such, the Group conducts its business in compliance with the Anti Money Laundering & Anti-Terrorism Financing Act 2001 and to ensure adequate safeguards are in place to prevent as well as identify and report incidents of money laundering within the Group.

VIII. Political Neutrality

The Group will not make any political contribution to any candidate, political party organization, political committee or political organization in return for an implied or promised official act. The Group and its directors are to be politically neutral in the conduct of our business.

IX. Channel to Report

The Group commit to continuously maintain a channel of communication with shareholder, employees, customers, business partners and regulatory bodies to enable them to have direct communication with appropriate level of authority to raise any concerns, without fear of retaliation, for timely and effective actions to be taken.

X. Corporate Citizenship

- The Group commit to act in a manner that is socially responsible to the society and within the laws, customs and traditions of the countries it operates in and contribute in a responsible manner to the development of communities
- The Group aspire to act in a manner that minimises the detrimental environmental impacts of its business operations
- The Group continuously support charities, educational and community service activities.