

## **TA WIN HOLDINGS BERHAD (291592-U)**

### **CODE OF CONDUCT AND ETHICS (“THE CODE”)**

Ta Win Holdings Berhad commits to encourage a safe, supportive and productive work environment. This needs cooperation and agreement from all parties to the organisation’s standards of conduct.

It is a set of rules or standards for all who participate in the Group and represent themselves outside the Group.

Ta Win Holding Berhad will conduct its business honestly and ethically wherever its operates. The Group will constantly create a reputation for honesty, fairness, respect, responsibility, integrity, trust and sound business judgement. The Group will not compromise any of its principles for short-term advantage. The Group will strive to adhere to high standards of personal integrity at all times.

The following are acts which the organisation considers unacceptable. All employees, officers and directors are discouraged to engage in such acts which may attract disciplinary action which may include reprimand, warning, suspension, dismissal, termination, etc:

- Permit their personal interests to conflict, or appear to conflict, with the interests of the organisation, its clients or affiliates, except with the shareholders’ approval in Annual General Meeting Representing the organisation in any transaction with others with whom there is any outside business affiliation or relationship
- Using the organisation’s contacts to advance their private business or personal interests at the expense of the organisation, its clients or affiliates
- Receiving bribes, kickbacks, gifts, gratuities, entertainment or other similar remuneration or consideration in order to attract or influence business activity
- Divulge company’s confidential or sensitive information to outsiders
- Insider dealing action
- Intentionally disclose false, inaccurate or misleading information to relevant bodies
- Disregard the law or regulations of governing bodies
- Being absent from work without a valid reason
- Wilfully damaging, destroying or stealing property belonging to fellow employees or the organisation
- Fighting or engaging in a disorderly conduct
- Refusing to follow or failing to carry out the reasonable instructions of a supervisor
- Ignoring work duties or wasting time during working hours
- Coming to work under the influence of alcohol or any drug, bringing alcoholic beverages or drugs to the company property
- Intentionally giving any false or misleading information to obtain a leave of absence
- Using threatening or abusive language towards a fellow employee or superior
- Smoking contrary to established policy or violating any fire protection regulation
- Wilfully or habitually violating health and safety regulations
- Failing to wear clothing conforming to standards set by the company
- Being late or taking unexcused absences from work
- Not taking proper care of, neglecting or abusing company equipments, tools or property
- Using company equipment, tools or property in an unauthorised manner

- Possessing firearms or weapons of any kind on company property
- Instigating fellow employees to go on a riot
- Failing to encourage the reporting of unlawful or unethical behaviour
- condoning, facilitating or supporting any activity that is even remotely associated with money laundering or financing of terrorism

#### REPORTING OF NON COMPLIANCE

Employees are encouraged to report to their immediate superior or other appropriate personnel about observed behaviour that they believe may be non-compliance with the Code.

The Group will keep confidential the identity of the person reporting a possible non-compliance with the Code. Reprisal against the person who has, in good faith, reported non-compliance or suspected non-compliance is strictly prohibited.

#### 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.

#### WAIVER OF THE CODE

Waiver of the Code may be made by the Board or the appropriate Committee of the Board. Waiver of the Code may be granted on a case-by-case basis and only in extraordinary circumstances.