


Private & Confidential



TDM BERHAD GROUP
CODE OF BUSINESS ETHICS
(CoBE)

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This Policy had been endorsed by Board Risk and Compliance Committee on 24 August 2022 and approved by Board of Directors, TDM Berhad on 28 August 2022.

DISCLAIMER NOTICE

This Code of Business Ethics (“CoBE”) is the sole property of TDM Berhad (“TDMB”) and has been prepared for the exclusive use of the management and employees of TDMB Group of Companies.

AMENDMENTS

Amendments to this CoBE are subject to authority limits outlined in the Delegation of Authority Limit of TDMB.



	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022

Table of Contents

ABOUT THIS CoBE	5
DEFINITIONS	7
ABBREVIATION	9
SECTION 1: INTRODUCTION	9
1.1 APPLICATION AND COVERAGE.....	10
1.2 GENERAL PRINCIPLES OF THIS COBE.....	10
1.3 WHO MUST FOLLOW	10
1.4 BOARD MEMBERS AND MANAGEMENT RESPONSIBILITIES	11
1.5 EMPLOYEES RESPONSIBILITIES	11
1.6 BREACH OF THIS COBE.....	12
SECTION 2: OUR PEOPLE	12
2.1 WORKPLACE CULTURE AND ENVIRONMENT	12
2.2 DRESS CODE	13
2.3 HEALTH, SAFETY AND ENVIRONMENT.....	13
2.4 ALCOHOL, DRUGS AND GAMBLING	14
2.5 SEXUAL HARASSMENT	14
2.6 HARASSMENT AND BULLY	15
2.7 NON-BUSINESS WORKPLACE RELATIONSHIPS.....	15
2.8 MISBEHAVIOR AND MISCONDUCT.....	16
SECTION 3: OUR GROUP	16
3.1 PROTECTING GROUP ASSETS.....	16
3.2 USE OF INFORMATION	17
3.3 PERSONAL DATA PROTECTION	18
3.4 BUSINESS, OPERATIONAL AND FINANCIAL RECORDS.....	18
3.5 INFORMATION TECHNOLOGY AND SYSTEMS	19
3.6 INTELLECTUAL PROPERTY	19
3.7 ABUSE OF INFORMATION AND INSIDER TRADING	20
3.8 PUBLIC DISCLOSURE AND MEDIA STATEMENT	20
SECTION 4: THIRD PARTIES, GOVERNMENT AND COMMUNITIES	21
4.1 ANTI-BRIBERY AND CORRUPTION	21
4.2 POLITICAL CONTRIBUTIONS AND ACTIVITIES	21
4.3 DEALING WITH GOVERNMENT AUTHORITIES.....	22
4.4 WORKING WITH LOCAL COMMUNITIES.....	22

	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022

4.5 DEALING WITH COUNTERPARTIES AND BUSINESS PARTNERS 22

4.6 GIFTS AND ENTERTAINMENT 23

SECTION 5: CONFLICT OF INTEREST 24

5.1 AVOIDING CONFLICT OF INTEREST 24

5.2 INVESTMENT/ BUSINESS ACTIVITIES 24

5.3 OUTSIDE EMPLOYMENT AND DIRECTORSHIP 25

SECTION 6: ADMINISTRATION OF THE COBE 26

6.1 WHERE TO GET GUIDANCE 26

6.2 RAISING A CONCERN 26

6.3 WHISTLEBLOWING 27


6.4 DISCIPLINARY ACTION 27

APPENDIX 1 – CoBE Receipt and Acknowledgment 28


APPENDIX 2 – Interest Declaration Form 29

ABOUT THIS CoBE

- a. This CoBE is applicable to TDMB and its Group of Companies (“the Group”).
- b. This CoBE applies to all Directors and employees of the Group as well as any third parties dealing with the Group. The standards set out in this CoBE are to be used as reference and general guidelines and are not intended to supersede any applicable legal or regulatory requirements such as those imposed by the Federal and State Government.
- c. Compliance to this CoBE is mandatory. Any non-compliance shall be subject to disciplinary action. In the absence of written policies or when in doubt, appropriate authorities e.g., Head of Compliance, Integrity & Sustainability, Head of Human Resource and/ or Head of Legal & Secretarial should be consulted. Absence of policy does not by itself imply that an action is either permitted or forbidden.


 POLICY	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
	Original Date	27.03.2018
	Revision Date	28.08.2022

- d. This CoBE shall be reviewed as and when required or when changes occur. Any amendment made shall be communicated through issuance of an internal memorandum.
- e. The completion and revision of this CoBE shall require the approval of TDMB's Board of Directors.
- f. As and when required by the Group, all Directors and employees are required to submit the signed version of the following forms to Human Resource Department:
 - i. CoBE Receipt and Acknowledgement Form
 - ii. Interest Declaration form
- g. In the event that any clarification is required, it shall be your responsibility to consult your immediate supervisor and/or Head of Compliance, Integrity & Sustainability, Head of Human Resource or Head of Legal & Secretarial.


	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022

DEFINITIONS

TERMS	DEFINITIONS
Bribe	Any gift, payment, benefit or other advantage, pecuniary or otherwise, offered, given, or received in order to secure an undue or improper result, award, decision, benefit or advantage of any kind. A bribe needs not involve cash or another financial asset; it can be any kind of advantage, including loan guarantees, unpaid use of corporate services or property, or provision of employment to the family or friends of people with whom the Group deals.
Employee	Any person who is in the employment of TDMB Group including but not limited to permanent, contract, executive, non-executive, secondees, trainees/ interns and individual on direct hire.
Family or Household	Includes employee's spouse(s), children (including stepchildren and adopted children), parents, stepparents, siblings, stepsiblings, grandparents, grandchildren, in-laws, uncles, aunts, nieces, nephews, cousins, and other persons who are a member of your household.
Fraud	Refers to the wrongful or criminal deception intended to result in financial or personal gain.
Gift	Includes but are not limited to cash, any kind of gifts or prizes, transportation, use of properties and vacation facilities, holidays, stocks or other securities, participation in stock offerings, favorable terms on any products or services, home improvements, tickets, gift certificates, commissions and entertainment.
Government Official	Official or employee of Government, or any agency, ministry or department of a government.
Gratification	Shall include but not be limited to pecuniary and non-pecuniary benefits such as money, donation, gift, loan, fee, reward, valuable security, property or interest in property, movable or immovable property, financial benefit, office, dignity, employment, contract of employment or services, agreement to give employment or render services in any capacity, any offer, undertaking or promise, whether conditional or unconditional, of any gratification, including favours which is of value to the recipient, forbearance which is beneficial to the recipient, and any other gratification as defined in the MACCA.
Head of Company	Refers to the Business Head who runs all aspects of TDM Berhad (i.e., holds title such as Executive Director or Group Chief Executive Officer etc.).
Head of Subsidiary	Refers to the Business Head who runs all aspects of the Company other than Head of Company (i.e., holds title such as Chief Executive Officer, General Manager, etc.).
Human Resource	Refers to either the Group Human Resource of TDMB and/ or the Human Resource or any other Department in charge of employee related matters of the respective companies.

	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022


TERMS	DEFINITIONS
Management	Refers to those persons who perform the task of managing a specific function of the Company (e.g., Chief Financial Officer, Heads of Department, etc.).
Public Official	Person who exercising a public function includes, without limitation, candidates for public office, officials of any political party, and officials of state-owned companies.
Sexual Harassment	Defined as any unwanted conduct of a sexual nature in the form of verbal, non-verbal, visual, psychological or physical harassment.
TDMB Group or the Group	References are made to TDMB and subsidiaries.
The Board	Refers to the Board of Directors of the Company.
The Company	TDM Berhad or the subsidiaries.
You	Any person to whom this CoBE applies. Where more specific references are used such as Director or employee, the more specific reference applies.

	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022

ABBREVIATION

TERMS	REFERENCE TO
CoBE	Code of Business Ethics
CSR	Corporate Social Responsibility
HOC	Head of Company (TDMB)
HOD	Head of Department
HOS	Head of Subsidiary
HSE	Health, Safety & Environment
IT	Information Technology
MACC	Malaysian Anti-Corruption Commission
PDPA	Personal Data Protection Act 2010
TDMB	TDM Berhad

SECTION 1: INTRODUCTION

	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022

1.1 APPLICATION AND COVERAGE


- 1.1.1 This TDMB Group's CoBE is intended to apply to every Director and employee of the Group, except as otherwise stated in this CoBE.
- 1.1.2 Although this CoBE is specifically written for the Directors and employees of the Group, subsequently third parties who have business relationships with the Group also need to comply with it when performing their work or services. The third parties include but not limited to, contractors, subcontractors, consultants, agents, suppliers, vendors, customers, government officials and communities. Failure to comply with the relevant principles and standards set out in this CoBE may result in the termination of the non-complying party's relationship with the Group and other adverse consequences.

1.2 GENERAL PRINCIPLES OF THIS COBE

- 1.2.1 This CoBE defines how you should conduct yourselves as representatives of the Group. This CoBE also addresses your responsibilities to the Group, to each other, to business partners, governments, Rakyat, as well as to yourselves.
- 1.2.2 This CoBE shall be read together with other relevant Group policies and procedures, and applicable acts, laws, rules and regulations with utmost integrity and honesty in all matters and situations.
- 1.2.3 This CoBE attempts to address situations that you might encounter on legal and ethical issues. However, this CoBE does not address every possible situation. You are obliged to familiarise yourself with it and adhere to all applicable policies, procedures, laws and regulations of the countries in which the Group operates. If you are still in doubt, please seek advice from your Head of Compliance, Integrity & Sustainability, Head of Human Resource and/ or Head of Legal & Secretarial.
- 1.2.4 This CoBE governs the Group's business practices and decision making. Therefore, all applicable policies, procedures and local practices in the Group shall conform to this CoBE. In the event of ambiguity or conflict between this CoBE and the Group policies and procedures, this CoBE shall prevail, and the Group policies and procedures shall be revised to ensure conformance with this CoBE. However, in any case of inconsistency between this CoBE and regulatory and legislative pronouncements, the law shall prevail. If you have any question about any of these conflicts, please consult your Head of Compliance, Integrity & Sustainability, Head of Human Resource and/ or Head of Legal & Secretarial.

1.3 WHO MUST FOLLOW

- 1.3.1 This CoBE shall apply to all Directors and employees of TDMB Group and third parties with whom the Group has a current or potential relationship. You must also adhere to other internal policies, guidelines, standard operating procedures, and other applicable laws and regulations that govern your business activities.
- 1.3.2 No matter when or where, either outside working hours or working place, you must adhere to all applicable laws, rules and regulations, and not to involve yourselves in immoral or any activities that could tarnish the Group's image and reputation.

	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022

1.3.3 The Group believes that every employee is an ambassador, regardless of your job, title, or function. Following this CoBE could turn you into an excellent role model, who works ethically and with full integrity, to others.

1.3.4 The Management including Directors are responsible to serve as positive role models in every respect and help employees to understand and comply with this CoBE at all times.

1.4 BOARD MEMBERS AND MANAGEMENT RESPONSIBILITIES

1.4.1 Board members and Management are accountable for ethical behaviour. The Group expects you to always portray an appropriate conduct. You shall uphold the spirit and intent of this CoBE, demonstrate the core values all the time and lead with integrity by:


- a. Understand this CoBE and be able to deliver its key messages and contents;
- b. Help employees understand this CoBE as well as other policies;
- c. Consistently demonstrate exemplary behaviour;
- d. Encourage employees to speak up on any ethical matters or misconduct related to CoBE without fear of retaliation;
- e. Recognise employees' ethical behaviour;
- f. Never dismiss or ignore any concern raised; and
- g. Act responsibly if employees report any misconduct or suspected violating of this CoBE.

1.5 EMPLOYEES RESPONSIBILITIES

1.5.1 You are expected to understand this CoBE and comply with it wherever you are at all times. It is our responsibility to work with integrity, respect, and good judgement, and not forgetting to always be within the law. All employees shall be accountable for:

- a. Fully understand this CoBE and know how to access it, as well as apply it;
- b. Follow the provision and spirit of applicable laws, rules and regulations and all policies, guidelines, and procedures of the Group;
- c. Raise questions immediately if you are ever in doubt or unsure;
- d. Speak up if you think there is a violation of this CoBE, or an activity or behaviour that potentially could violate this CoBE; and
- e. Cooperate with investigators and regulators when there is any issue arises related to non-compliance matter.

1.5.2 These are all important responsibilities, and all employees must take them seriously. This CoBE does not cover every scenario you might find yourselves in, and you should use your good judgement to determine whether your action in line with the Group policies and procedures. If you are in doubt, please consult your Head of Compliance, Integrity & Sustainability, Head of Human Resource and/or Head of Legal & Secretarial.

	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022


1.6 BREACH OF THIS COBE

- 1.6.1 Everyone in the Group is held accountable for their own behaviour. Any action that violates this CoBE must be viewed as a serious matter and shall be addressed by the relevant authorities, e.g., Head of Compliance, Integrity & Sustainability, Head of Human Resource and/ or Head of Legal & Secretarial. The relevant authorities shall, in accordance with respective policies and standard operating procedures, determine the appropriate disciplinary and corrective actions to be imposed. Among the actions are:
- a. Discussion with superiors and managers for giving out advice on expected ethical behaviour
 - b. Counselling session
 - c. Suspension pending investigation
 - d. Internal Investigation
 - e. Domestic Inquiry
 - f. Punishment
- 1.6.2 Anyone in the Group who is found guilty or who has violated this CoBE shall be subject to disciplinary action which may include repayment of financial loss and termination of employment as decided by the relevant authorities within the Group.
- 1.6.3 In the event of certain violations (e.g., bribery and commercial crimes) that may result in criminal prosecution, the matters shall be referred to the appropriate law enforcement authorities, e.g., Royal Malaysia Police and MACC.
- 1.6.4 You have the obligation to uphold the standard of this CoBE. If you are aware of or suspect any behaviour that concerns you, or that may represent misconduct, raise the issue promptly. You may consider speaking first to the superior whom you feel comfortable with, or else report to Head of Compliance, Integrity & Sustainability. Complaints may also be made through the Group's secured Whistleblowing channel. This shall be read together with Section 6.0, Item No. 6.2 – Raising a Concern.

SECTION 2: OUR PEOPLE

2.1 WORKPLACE CULTURE AND ENVIRONMENT

- 2.1.1 The Group is committed to fostering an inclusive environment where everyone is treated with respect, trust and dignity.
- a. Respect
 - i. You shall treat your superiors, peers, subordinates and external stakeholders with respect, trust, honesty and dignity.
 - b. Equality in Employment
 - i. The Group provides equal opportunities to all endeavours to ensure that employment-related decisions are based on relevant qualifications, merit, performance and other job-related factors and in compliance

	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022

with all applicable laws and regulations; and

- ii. The Group promotes diversity and inclusivity and will not tolerate any form of discrimination. This means you shall not discriminate against others based on age, gender, race, disability, nationality and religion unless specific laws or regulations expressly provide for selection according to specific criteria.

c. Harassment and Violence

- i. Any types of harassment and violence will not be tolerated. These actions or behaviours include but not limited to comments based on gender, racial, religion or ethnic characteristics, unwelcomed sexual advances, spreading of malicious rumours or use of emails, voicemail and other forms of communication channels to transmit insulting or discriminatory material.


- 2.1.2 You must not engage or become involved in any behaviour or activities that may be categorised as subversive or commit any wrongdoing, criminal or otherwise that is punishable under the laws of any country. If you are found guilty by a court of law or found to be involved in subversive activities or commit a criminal offence, you will be dealt with in line with the Group’s relevant policies and procedures and may be summarily dismissed.

2.2 DRESS CODE

- 2.2.1 In representing the Group, Directors and employees must ensure that their appearance reflects the professionalism expected of them, which includes high regards to personal hygiene and good grooming.
- 2.2.2 All Directors shall be neatly, appropriately and decently attired during meetings and at any time when they are representing the Group.
- 2.2.3 All employees should be neatly, appropriately and decently attired during office working hours. All employees should comply with more specific rules concerning attire that may be set out in any country supplement to this Code applicable to them or be otherwise established by the Group for the workplace. This shall be read together with the Human Resource Policy in regard to the “Dress Code Policy”.
- 2.2.4 The dress code includes identity or access card, uniform or any other attire bearing the Group’s name and/ or logo which reflects the Group’s image. Employees shall not tamper with or deface their identity or access card or make unauthorized alterations to the uniform.

2.3 HEALTH, SAFETY AND ENVIRONMENT

- 2.3.1 The Group is committed to provide a safe, conducive and healthy workplace for all employees working at its facilities and minimising the impact of its operations on the environment.
- 2.3.2 The Group does not tolerate behaviours that could cause any form of harm or damages exercise by Directors, employees, relevant third parties, or anyone who have business transactions.

	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022


- 2.3.3 No one shall possess any type of weapon on the Group property, at work-related functions or while performing company business, except authorised by company.
- 2.3.4 The Group is committed to comply with the environmental laws and regulations, and to minimize any damage to the environment arising from its activities. Relevant employees must maintain all required environmental documentation accurately and completely.
- 2.3.5 All employees, as well as relevant third parties must conscientiously and diligently comply with all HSE requirements, measures, work rules and standard operating procedures set out in manuals, handbooks and/or documents issued by the Company and any applicable laws and regulations.
- 2.3.6 Management shall demonstrate stewardship by ensuring all of these documents are periodically reviewed and updated in accordance with the applicable laws and regulations such as Occupational, Safety and Health Act (OSHA).

2.4 ALCOHOL, DRUGS AND GAMBLING

- 2.4.1 The Group is committed to providing a work and business environment that is free of alcohol and substance abuse.
- 2.4.2 The following examples but not limited to are strictly prohibited within the Group's premises at all times, during working hours, while on the Group's business trip and/ or representing the Group:
 - a. Using or being under the influence of alcohol or illegal substance.
 - b. Smoking or vaping at non-designated areas.
 - c. Possession or abuse of illegal and/ or unauthorized drugs or narcotics.
 - d. Unauthorised drug consumption and dealer.
 - e. Gambling in any form, including making or taking bets, card playing, whether for money or otherwise.

2.5 SEXUAL HARASSMENT

- 2.5.1 The Group is committed to providing a safe working environment for all its employees to ensure they are protected from all forms of sexual harassment and unsolicited or unwarranted sexual propositions and advances.
- 2.5.2 Sexual harassment means any unwanted conduct of a sexual nature having the effect of verbal, non-verbal, visual, psychology or physical harassment. It could be in various conducts but not limited to:
 - a. Sexual assault against another employee and/or outsiders.
 - b. Sending or distributing sexual-related materials (such as pornographic materials, lewd messages).
 - c. Keeping or viewing pornographic materials on the Group's premises (such as pictures, videos, website)
- 2.5.3 Sexual harassment in the workplace includes any sexual harassment occurs during the performance of employment duties and responsibilities in and outside the workplace.

	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022


- 2.5.4 Situations under which such sexual harassment may take place include, but are not limited to:
- a. At workplace;
 - b. At the Group social functions;
 - c. At work-related conferences or training sessions;
 - d. During work-related travel;
 - e. Over the phone; and
 - f. Through electronic media.
- 2.5.5 The act of sexual harassment, unsolicited and unwarranted sexual propositions and advances shall be treated as misconduct, in which the party involved is subject to disciplinary action.
- 2.5.6 Any complaints on sexual harassment can be made via email, in writing or verbally to Human Resource Department. If you are uncomfortable, you can raise a report via the secured Whistleblowing channel.

2.6 HARASSMENT AND BULLY

- 2.6.1 The Group does not tolerate to any form of harassment or bully at the workplace. Harassment is any unwelcome, humiliating, intimidating or offensive conduct. Bully is repeating verbal, physical, social or psychological abuse by an individual or a group.
- 2.6.2 Both harassment and bully can come in any form but not limited to physical actions, verbal and written, as well as through images and videos. Despite their numerous forms, all of them could negatively affect work performance and the environment at the workplace.
- 2.6.3 Harassment or bully can take place without any intent to harm. Therefore, you shall be mindful and careful before executing such actions like:
- a. Showing insensitivity, intolerance and disrespect towards others, including the opposite gender, other races and/ or the religious requirements of others.
 - b. Making insulting comments based on gender, racial or religious characteristics.
 - c. Making inappropriate name calling, joke, prank or a compliment perceived negatively.
- 2.6.4 You shall not confuse harassment or bully with productive feedback or coaching on the job performance, or any work-related behaviour aiming for development.
- 2.6.5 Any complaints on harassment or bully can be made via email, in writing or verbally to Human Resource Department. Alternatively, you may raise a report via the secured Whistleblowing channel.

2.7 NON-BUSINESS WORKPLACE RELATIONSHIPS

- 2.7.1 When you have relationships beyond professional relationships and social friendships, such relationships may create conflicts of interest as well as actual or perceived

	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022

favouritism or bias, depending on the employees' work roles and respective positions. Any employee who has a relationship beyond professional relationship should not be in the same department or unit.

2.7.2 Such relationships can also affect core values, such as respect and trust amongst staff, and impact upon the reputation and integrity of the Group. These relationships create a likelihood of disaffection, disharmony and significant difficulties for the parties concerned as well as for other co-employees of the Group. In these regards, such relationships are discouraged.

2.7.3 There is a basic conflict of interest when you are dealing with someone who is your family member or with whom you are in a close personal relationship. Even if you act properly, your relationship may be seen as influencing your judgment in terms of performance review, compensation and promotion, amongst others. Accordingly, you must disclose any of such relationship and you must not supervise, directly or indirectly, any employee with whom you have such a relationship without written permission from your Management (or, in the case of Directors, the Board of Directors). Changes to work arrangements of either or both employees involved may be made, at the Company's discretion including but not limited to transfer, relocation, secondment or change of reporting line.

2.8 MISBEHAVIOR AND MISCONDUCT

2.8.1 Employees shall conduct themselves responsibly, ethically, honestly and with integrity and respect for one another. The Group does not condone any act of misconduct that is deemed to be detrimental to the interest of the Group. The followings are the misconduct and misbehavior and not exhaustive to:

- a. Abuse and/or inappropriate use of Company assets/ media/ information
- b. Fraud and dishonesty
- c. Acts of violence, inappropriate behaviors and criminal offences
- d. Violate any of Company's policies and procedures
- e. Any other acts that could bring disrepute or embarrassment to the Group


SECTION 3: OUR GROUP

3.1 PROTECTING GROUP ASSETS

3.1.1 Group assets cover all tangible and intangible assets that are legally owned or leased by the Group through purchasing, leasing, concession, grant etc., or any other assets which the Group has a contractual obligation to protect against loss or damage either financial or non-financial.

3.1.2 Assets of the Group exist in numerous forms, either physical or non-physical, such as facilities, equipment, inventories, funds, information technology, intellectual properties, information and data, brand and reputation, etc.

3.1.3 Using Group assets for personal purposes is prohibited. At all times, you must use the Group assets only for the purpose and in the manner intended, in accordance with Group policies and procedures, as well as applicable laws and regulations. The Group


	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022

has the right to monitor or, if needed, intercept your use of any assets for any reason, at any time, subject to applicable laws.

- 3.1.4 Working for the Group means you are responsible to take proper precautions to ensure the assets are safe from theft, damage, or misuse. This includes protecting them from destruction, disposal, being sold or loaned or donated without authorisation. Subject to applicable laws, you may be held liable and punished for any loss or damage to Group assets arising from your misconduct or negligence or careless action or because of unauthorised action.
- 3.1.5 If the third party is authorized to use the Group assets, he/ she must comply with Company's policies and procedures.
- 3.1.6 All 'loss event' incidents shall be reported to immediate superior or related department or unit.

3.2 USE OF INFORMATION

- 3.2.1 Confidential information includes, but is not limited to, any information on everything from contracts to business plans, technical specifications, and employee information, that the Group has not disclosed or made generally available for public access and proprietary information includes but is not limited to emails, documents and all other files, electronic or otherwise, edited and/ or stored on the Group equipment and are considered to be the exclusive property of the Group. The confidentiality also covers the following information:
 - a. Business and financial information of the Group
 - b. Business strategy of the Group
 - c. Pricing and marketing strategies of the Group
 - d. Intellectual properties
 - e. Information of Directors, employees and customers
 - f. Other corporate databases
 - g. Any information as the Group may classified as confidential from time to time.
- 3.2.2 Being a part of the Group means you are obligated to protect confidential and proprietary information using any means necessary at all times, including when you are out of the workplace or after working hours, and even after your employment has ended.
- 3.2.3 You must not disclose confidential and proprietary information to any person outside of the Group, including family and friends, except when disclosure is required for the Group's business purposes. You must also not disclose such information to anyone within the Company other than the members involved in the course of the activities. Any unauthorised disclosure of confidential and proprietary information is a violation of this CoBE and subject to disciplinary action.
- 3.2.4 The Group respects others' confidentiality. You must not bring, disclose, or use any confidential information of your former employer without their prior consent. Employees are also required to protect confidential information of any third party which employees have access to in the course of their work. Likewise, at the end of

	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022


your employment or engagement, without the Group consent, you are prohibited from disclosing and retaining all means of access to Group information.

3.3 PERSONAL DATA PROTECTION

- 3.3.1 Personal Data means any information in respect of commercial transactions that relates directly or indirectly to an individual, who is identified or identifiable from the information alone or with other information including any sensitive personal data and expression of opinion about the individual.
- 3.3.2 The Personal Data Protection Notice issued to employees explains how the Group collects and handles employee information in accordance with the Malaysia Personal Data Protection Act 2010 ("PDPA").
- 3.3.3 All Directors and employees must comply with the PDPA. Under the Act, users of personal data shall not disclose the data to third party without consent of the data owner, unless it is for the purpose for which the data was originally collected.
- 3.3.4 All employees, particularly employees who have access to personal data of any persons, whether employees, consultants, customers, suppliers and/or any related party whereby personal data is processed and accessed, must not unlawfully use, access and/or revise such personal data for any purpose or reason.
- 3.3.5 You shall record, manage, store, transfer and dispose all data and records in compliance with the PDPA and applicable law, regulation, tax and accounting requirements.

3.4 BUSINESS, OPERATIONAL AND FINANCIAL RECORDS

- 3.4.1 The records include not only financial accounts, but other records such as project reports, staff records, legal documents, etc. In this regard, all employees have the responsibility to ensure accurate and complete business, operational, and financial records with conformity to all required principles, standards and internal controls. To ensure proper recording and documentation, employees shall not:
 - a. Make or permit entries to be made to any account, record or document with the intention to falsify, mislead or obscure the true nature of the transaction or authorisation limits.
 - b. Ignore any inaccurate, false or misleading data and must bring to the attention to the Group the presence of such information.
 - c. Amend, alter or deface documents submitted by business associates or customers.
 - d. Involve in any arrangement to forgeries in any form.
- 3.4.2 Accurate and honest recording and reporting of any information are essential to the Group's credibility and reputation. False or misleading entries, unrecorded data without appropriate supporting documentation and approval are strictly prohibited and violate the Group policy and the applicable laws, rules and regulations.
- 3.4.3 The Group establishes and maintains internal procedures and controls to ensure the integrity of the Group's financial and non-financial reporting and legal

	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022

compliance.


- 3.4.4 The retention and destruction of documents and records must be in compliance with all legal requirements and finance or accounting policies. For tax, auditing and secretarial purposes, it is important to keep records as per statutory requirements.

3.5 INFORMATION TECHNOLOGY AND SYSTEMS

- 3.5.1 The Group IT and communications systems are to be used for the Group’s work and business purposes only. You may be granted access to multiple technology systems, internet, data, and IT equipment (e.g., desktop and laptop computers, printers, etc.) which are ultimately the assets of the Group.
- 3.5.2 You are responsible for safeguarding the IT and data from any loss, damage, theft, misappropriation or unauthorised access using necessary precautions. This means you must use them appropriately at all times, in accordance with applicable policies and procedures, and laws and regulations.
- 3.5.3 Inappropriate use of IT or data or storing or accessing inappropriate information using the systems is prohibited. You must not use the facilities for personal use without proper authorisation. The Group will not tolerate any misuse of its services, equipment, or systems.
- 3.5.4 Software used by employees to conduct Company business must be appropriately licensed. Never make or use illegal or unauthorised copies of any software, whether in the office or at home since doing so may constitute copyright infringement and may expose you and the Group to potential civil and criminal liability. The Group IT Department has the right to inspect Company computers periodically to verify that only approved and licensed software has been installed. Any non-licensed/ supported software will be removed.
- 3.5.5 The Group reserves the right to monitor any content in the computer facilities. This includes, but is not limited to, email messages, blogs, internet history and any other contents in computer facilities. Any information recovered may be used as evidence in domestic proceedings, courts of law or disclosed to the authorities or regulatory bodies, as the case may be.

3.6 INTELLECTUAL PROPERTY

- 3.6.1 Employees must not use intellectual property belonging to the Group for personal gain. The unauthorised use of intellectual property can lead to serious loss of value to the Group. Examples of intellectual property include patents, trademarks, service marks, domain names, copyrights, trade secrets, rights in know-how, etc.
- 3.6.2 The corporate names and logos of the Group are intangible assets that carry the goodwill and valuable to the Group. Their usage shall only be for official purposes. The corporate names and logos must be respected, safeguarded and shall not be subjected to personal abuse.
- 3.6.3 As intellectual property rights are protected by law, any violation or misconduct will be punished in accordance with applicable laws and regulations like Trademarks Act 2019, as well as disciplinary action by the Group.


	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022

3.7 ABUSE OF INFORMATION AND INSIDER TRADING

- 3.7.1 You must protect any confidential business information of the Group and its counterparties, and never use it for your own benefit or the benefit of other persons.
- 3.7.2 Insider trading involves dealing in the securities of any company listed on a stock exchange at any time when you have price sensitive information that is not generally available to shareholders of that company or the public. The use of inside or unpublished information about the Group investments and/or potential investment targets or other Group strategies in buying or selling shares of these companies is strictly prohibited. The employees may have such information by their position in the Group or because someone in such position may have provided them, directly or indirectly, with the information.
- 3.7.3 Any person either internal or external party is an “insider” if that person possesses Price Sensitive Information and knows or ought reasonably to know that the information is not generally available publicly.
- 3.7.4 Price sensitive information also applies to information obtained in respect of any other listed company with whom the Group conducts business. In this context, price sensitive information would normally be information that would affect the decision making of a normal investor had the investor known about the information. It is our responsibility to protect such information from access by unauthorised persons. You should also not act on it inappropriately or for personal gain.
- 3.7.5 You are required to abide by all applicable laws on securities market abuse, which involves spreading false information or engaging in activities designed to manipulate the market for publicly traded securities.
- 3.7.6 You must also refrain from giving advice, tips or hint to others regarding the trade in these financial instruments or shares to anyone, including your family members. Insider trading is a criminal offence under various laws and regulations in Malaysia as well as other countries in which the Group operates. You should note that the penalties are very serious and will lead to disciplinary action.
- 3.7.7 Insider trading is considered as serious offence under Part V, Subdivision 2 of the Capital Market and Services Act 2007 (“CMSA”) and punishable under Section 188(4) of the CMSA.

3.8 PUBLIC DISCLOSURE AND MEDIA STATEMENT

- 3.8.1 Employees shall not issue any statement, written or verbal to the media, social media and/ or public (including all forms of electronic media) on matters in relation to the employee’s duties or the Group’s activities and performance that can tarnish Group’s reputation.
- 3.8.2 Any dealing with the media shall be handled by or referred to the relevant authorized parties to ensure accurate, consistent, professional communication response and to avoid misinterpretations.
- 3.8.3 Only employee who is in the position or have the authority is allowed to release the media statement and issue the information to the public.

	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022

- 3.8.4 Employees are not allowed to post comments, photos and information in social media that will give negative or adverse impact to the Group direct or indirectly.


SECTION 4: THIRD PARTIES, GOVERNMENT AND COMMUNITIES

4.1 ANTI-BRIBERY AND CORRUPTION

- 4.1.1 The Group is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates, and in implementing and enforcing effective systems to counter bribery and corruption. Both bribery and corruption are punishable offences under the MACC Act 2009 (Amendment Act 2018) ("MACCA").
- 4.1.2 All Directors and employees must not offer, give, solicit, demanding or accept any bribes and/or any other improper gratification in order to achieve any business or personal advantage for themselves or others or engage in any transaction that contravenes any applicable anti-bribery or anti-corruption laws.
- 4.1.3 If you receive a request for a bribe or if you are offered a bribe, you must report it to your superior or HOC or the secured Whistleblowing channels. It is to be noted that failure to report bribery is an offence under Section 25 (2) of the MACCA.
- 4.1.4 The Group needs to ensure adequate procedures in place to prevent any person associated with the Company from engaging in corrupt practices in relation to its business activities.

4.2 POLITICAL CONTRIBUTIONS AND ACTIVITIES

- 4.2.1 It is strictly prohibited for the Group to grant donations or contribute funds/assets to any political party or politician. However, good faith donations to government entities, agencies, associations, and/ or events beneficial to the *Rakyat* are allowed, subject to approval in accordance with the Company's Delegation of Authority Limit and compliance with applicable laws and regulations.
- 4.2.2 You have the right to participate as individuals in the political party. However, your participation shall be carried out entirely on your own accord, by your own preference, during your own time and with your own resources. Any employee or Director who wishes to hold any key position as office bearer in any political party must disclose this intention to the HOC and Chairman of the Board respectively.
- 4.2.3 Directors or employees who are actively involved in political activities must not use their position in the Group to make any contribution or incur any expenditure using the Group's resources to benefit any political campaign, party or politician in any country. Any political opinions by the employees or Directors must be clearly delivered as personal opinions and not representative of the Group's opinion.
- 4.2.4 In order not to compromise the interests of the Group, employees who wish to stand for State, Federal and/or material elections are required to resign from the Group.

	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022

4.3 DEALING WITH GOVERNMENT AUTHORITIES


- 4.3.1 The Group strives to build transparent and fair relationships with government agencies and public officials. Appropriate action must be taken to comply with the applicable laws and regulations in all countries in which the Group operates, as well as the Group's relevant policies and procedures.
- 4.3.2 Any agent, contractor, or other representatives dealing with government officials on the Group's behalf must be evaluated and must be informed of all the provisions of this CoBE.
- 4.3.3 You are prohibited from offering gifts and entertainment, including travel related expenses, to government officials or their family members/ relatives and any person, such as an agent, consultant or contractor, if you know or suspect that a government official or his/ her family member will be the indirect beneficiary or recipient, without permission from your HOC and consultation with your Legal & Secretarial Department and/ or Compliance, Integrity & Sustainability Department.
- 4.3.4 Your division, department or operating unit may be subjected to formal or informal queries, surprise inspections, investigations or raids by regulators and government agencies. In any of these events, employees are expected to recognise the proper procedures in engaging with the Group stakeholders, including the notification and necessary approval requirement, where applicable.

4.4 WORKING WITH LOCAL COMMUNITIES

- 4.4.1 The Group aims to increase value and profit from all state business, commercial and investment activities to fund social programmes and give benefit to the *Rakyat*.
- 4.4.2 The Group is working for both the state and the Rakyat. All Directors and employees are encouraged to engage with and contribute to local communities through a variety of CSR programmes in a socially responsible manner, without compromising the benefits of any particular stakeholder.
- 4.4.3 In conducting the CSR programmes, we have to ensure that we comply with the Group's policies and procedures, and applicable laws and regulations. This is to protect the Group reputation, aligned with the CoBE and following a proper governance process.
- 4.4.4 We may also have to perform duties or conduct projects where we must meet and deal with people of different communities. In this case, we must respect, be aware and understand their norms, laws, practices, and customs, as well as to choose our actions and use our words properly.

4.5 DEALING WITH COUNTERPARTIES AND BUSINESS PARTNERS

- 4.5.1 The Group strives to build and strengthen its relationships with counterparties and business partners. You are expected to conduct business ethically and share the business ethics and principles prescribed in this CoBE with your counterparties and business partners.
- 4.5.2 Business dealings shall be impartial, objective and free from any influence, either


	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022

within or outside the Group. In this respect, you must avoid any business dealings with those who are likely to harm the Group's reputation and who violate laws and regulations (e.g., anti-corruption, criminal, safety or environmental).

- 4.5.3 The Group must select its counterparties independently and based on merit with consideration to, among others, price, quality, service, integrity and ethical standards. You must ensure that all procurement decisions are made solely in the Group's best interest and in compliance with the Group Procurement Policies and Procedures.
- 4.5.4 You must always treat customers with honesty and respect. You must provide them with accurate and truthful information about products and services. You must also endeavor to enhance the quality and reliability of products and services via continuous process improvement and innovation.
- 4.5.5 The Group endeavors to work or associate with companies that share the Group's values and ethics and the principles of this CoBE.

4.6 GIFTS AND ENTERTAINMENT

- 4.6.1 Generally, the Group adopts No Gift Policy whereby all Directors and employees including third parties shall not give or accepting gifts, entertainment or other benefits.
- 4.6.2 Notwithstanding the above, the Group recognises that the occasional acceptance or offer of modest gifts and entertainment may be a legitimate custom or practice in business relationships. Employees may accept meals or entertainment of nominal value about performing company business. 'Nominal' will depend on the circumstances. In general, nominal means something small, a gesture, or business courtesies. However, the Group prohibits the use of gifts and entertainment to influence business decisions.
- 4.6.3 You or your family members must not solicit any gifts or entertainment from counterparties or business partners directly or indirectly. You or your family members are also discouraged from accepting gifts or entertainment from these parties.
- 4.6.4 You should not give or accept gifts or entertainment or any other benefit or privilege that would in any way influence or appear to influence any business decision or gain an unfair advantage.
- 4.6.5 You must never offer or accept a business courtesy under circumstances that might be interpreted as an attempt to gain an unfair business advantage, and/or otherwise reflect negatively on the reputation of the Group.
- 4.6.6 Giving and receiving gift practices may vary among cultures. In some exception situation, it would be impractical to refuse or return a gift. In such case, employees are to practice good business sense and conscience.
- 4.6.7 You must strive to act in a fair and impartial manner in all business dealings, and promote professional relationships and practices, and a reputation for integrity.
- 4.6.8 This Section shall be read together with the Group's No Gift Policy and other relevant policies and procedures. When in doubt, you should seek guidance from your Head of Compliance, Integrity & Sustainability, Head of Human Resource and/ or Head of Legal & Secretarial.

	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022


SECTION 5: CONFLICT OF INTEREST

5.1 AVOIDING CONFLICT OF INTEREST

- 5.1.1 A conflict of interest arises in any situation in which an individual is in a position to take advantage of his or her role at the Group for his or her personal benefit, including the benefit of his or her family and friends.
- 5.1.2 All Directors and employees are expected to make decisions and actions in the best interests of the Group and must not be influenced by personal interest, considerations or relationships. Relationships with prospective or existing business partners, customers, competitors, regulators or colleagues must not affect your independent and sound judgement on behalf of the Group.
- 5.1.3 Directors and employees, who are in any way, directly or indirectly, have interest in business that have dealings with the Group, shall declare this to the Management (or, in the case of GCEO/Directors to the Board) and thereafter abstain from any involvement in the business dealings.
- 5.1.4 A conflict of interest will undermine the values of good faith, fidelity, diligence and integrity in the performance of your duties and obligations as expected by the Group. You must therefore avoid conflicts of interest between your personal dealings and your duties and responsibilities in the conduct of the Group's business. In particular, the use of office position, confidential information, assets and other resources for personal gain, or for the advantage of others with whom you are associated is prohibited. During the tenure of service with the Group, employees shall devote the whole of their time, attention and skills to the duties of their office to the best of their abilities and shall obey the reasonable and lawful directives of their superiors.
- 5.1.5 To avoid conflict of interest, those who has the authority to make decision is not allowed to have family relationship with other employee within the Company and/ or the Group. Should the situation occur, the Management on its discretion has the authority to make necessary work arrangement to the related employee. As instance family relationship between HOC, HOS or Head of Human Resource with another employee.
- 5.1.6 If you at any time think that you may have a potential or actual conflict of interest, you are obliged to disclose the conflict promptly to the Management (or, in the case of GCEO/Directors to the Board) by completing the Interest Declaration Form (**Appendix 2**) so that a determination can be made as to the existence and seriousness of an actual conflict. When in doubt, you shall adopt the highest standard of conduct.

5.2 INVESTMENT/ BUSINESS ACTIVITIES


- 5.2.1 You must not allow your investment activities to influence, or appear to influence, your independent judgment on behalf of the Group. The situation that is most likely to create the appearance of a conflict of interest is when you have an investment in the company of a competitor, business partners, family members or customers and your decisions may have a business impact on this outside party.

	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022

- 5.2.2 You must avoid any kind of investments that could cause, or probably could cause, conflict of interest that prevents you from upholding your duties and responsibilities to the Group.
- 5.2.3 You are also prohibited from directly or indirectly buying, or otherwise acquiring rights to any property or materials, when you know that the Group may be interested in pursuing such an opportunity and the information is not public.
- 5.2.4 When in doubt about how an investment might be perceived, you should disclose to the Management (or, in the case of GCEO/Directors, to the Board).

5.3 OUTSIDE EMPLOYMENT AND DIRECTORSHIP

- 5.3.1 Employees must be aware at all times that outside employment or directorship could create perceived, potential or actual conflict of interest which may compromise the ability to meet the primary job responsibility expected by the Group.
- 5.3.2 Prior to employment outside the Group or part time job/ self-employment, employees must declare to the Management. Generally, it is allowable subject to the following:
 - a. The organisation in which the employee engages or participates does not compete with any of the Group's business activities;
 - b. The employee's work performance or schedule is not affected nor interfered with;
 - c. The employee does not use the Group's assets or resources;
 - d. Confidentiality obligations to the Group are not violated;
 - e. The Group is not impacted in any way;
 - f. The job complies with laws and regulations; and
 - g. Any business which the employee owns is not dealing with any of the Group's affiliates e.g., suppliers, vendors, agents, consultants.
- 5.3.3 Employees serving on the Board of Directors or being a part of a directorship for an outside company or will be appointed, especially those that have business relationships with the Group, can present a conflict of interest. For such directorships, the employee must obtain prior written consent or approval from HOC or Board of Directors.
- 5.3.4 Employees and their families who have any financial/ assets interest in any external parties which have business relationships with the Group and who are involved in any way in the decision making, dealing or transactions with such entities during employment with the Group, must inform the HOC or Board of Directors in writing of such interest in clearance prior to entering into such decision, dealing or transaction.
- 5.3.5 Employees' failure to inform the Group when a conflict of interest (or potential conflict of interest situation as described above) becomes known to the employee and/or failure to comply with the requirements of the Group will be deemed as misconduct for which appropriate disciplinary action will be taken against the employee.
- 5.3.6 Conflicts of interest and potential conflicts of interest which have been fully disclosed and which are formally permitted by the Group will not constitute violations of this CoBE.

 POLICY	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022

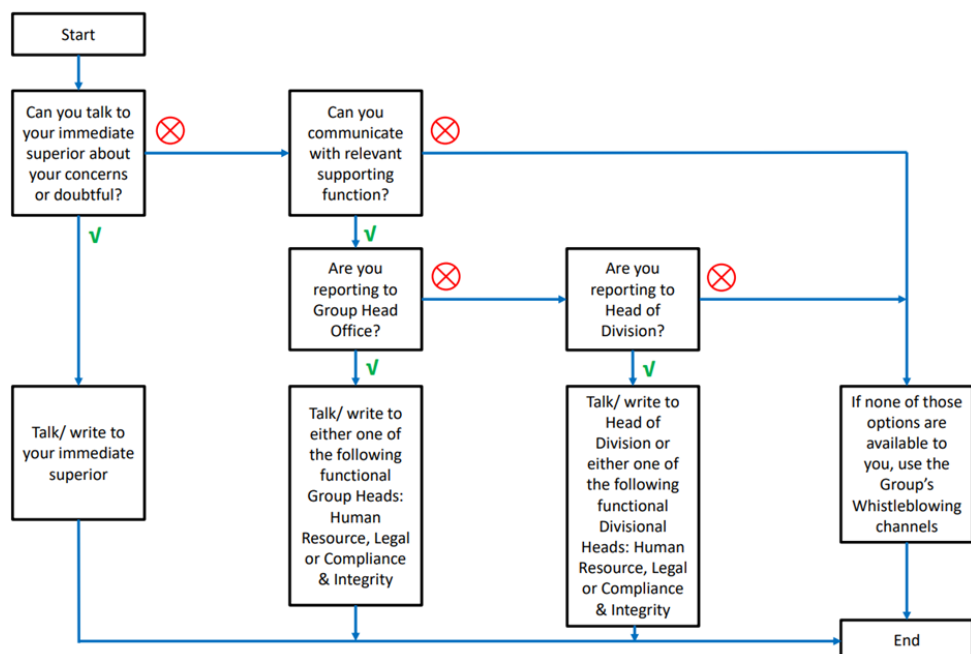
SECTION 6: ADMINISTRATION OF THE CoBE


6.1 WHERE TO GET GUIDANCE

- 6.1.1 You are responsible to read and understand this CoBE, and for reporting any suspected violations. If you have questions, seek clarification from your Head of Compliance, Integrity & Sustainability, Head of Human Resource and/ or Head of Legal & Secretarial; if you have ethical concerns, raise your concern in accordance with the following section, Raising a Concern.
- 6.1.2 You shall seek advice from your Head of Compliance, Integrity & Sustainability, Head of Human Resource and/ or Head of Legal & Secretarial if you are uncertain as to the interpretation or application of this CoBE.

6.2 RAISING A CONCERN

- 6.2.1 You are responsible to ensure that any instance of actual or suspected violation of this CoBE is reported promptly to your immediate superior or Head of Compliance, Integrity & Sustainability, Head of Human Resource and/ or Head of Legal & Secretarial.
- 6.2.2 The Group encourages you to share your questions, concerns or suggestions with someone who can address them properly. Please refer to 6.2.4 - the decision tree for options to raising a concern.
- 6.2.3 The Group expects all parties to act in good faith and have reasonable grounds when reporting a concern or issue. If allegations are proven to be malicious, parties responsible shall be subject to appropriate action, up to and including legal action, where applicable.
- 6.2.4 Please refer to the decision tree below for options to raise a concern:



	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022

6.2.5 In most cases, you should first discuss or seek advice from your immediate superior. If you are not satisfied with the response or if your concerns have not been addressed, you may raise your concerns to the next and following levels of the decision tree as illustrated above. However, if you have concerns over the sensitivity of information, you may directly use the secured Whistleblowing channels, details of which are available at Group’s Whistleblowing Policy.

6.3 WHISTLEBLOWING

6.3.1 The Group has established a whistleblowing channel which provides a secured, anonymous and confidential communication platform for internal and external parties to raise genuine concerns or report any misconduct or wrongdoings. This section shall be read together with the Group’s Whistleblowing Policy.

6.3.2 The Group’s Whistleblowing Policy aims to achieve the following objectives:

- a. To provide an avenue for employees and other stakeholders to raise concerns of any wrongdoing;
- b. To reassure employees and others that they will be protected from reprisals, discrimination or victimization for whistleblowing in good faith; and
- c. To provide a formal mechanism for action on all reports made.

6.3.3 The Group expects all parties to act in good faith and have reasonable grounds when reporting a concern or issue. If allegations are proven to be malicious, parties responsible shall be subject to appropriate action, up to and including the legal action, where applicable.


6.4 DISCIPLINARY ACTION

6.4.1 The Group takes all reports and incidents of possible violations of this CoBE seriously and shall investigate them. Appropriate disciplinary actions shall be taken where violations have been proven.

6.4.2 In respect of the users of this CoBE which include Directors, employees, and where applicable, third parties, anyone who are found to be in breach of this CoBE will be dealt with in accordance with any of internal policies and procedures, and/ or other applicable laws and regulations which could result in disciplinary action, termination of employment or business relationship.

6.4.3 The Group is committed to ensuring that any disciplinary action taken is in accordance with accepted practices and the relevant laws and regulations.

- End -

 POLICY	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
	Original Date	27.03.2018
	Revision Date	28.08.2022

APPENDIX 1 – CoBE Receipt and Acknowledgment



**Code of Business Ethics (CoBE)
RECEIPT AND ACKNOWLEDGEMENT**

I hereby declare that I have read and understand this CoBE. It is my sole duty and responsibility to read and understand the CoBE, which is an integral part of my Terms and Conditions of Service.

I shall conduct myself with complete integrity in the execution of my duties and assignments. I undertake that I will abide by the CoBE. If for any reason(s) I do not comply with any of the requirements of the CoBE, I shall not cite ignorance or lack of understanding as my self-defense. I further agree that the Management has the absolute right to act due to any violation of the CoBE.

I fully understand that the Management has the absolute right to review or amend any of the contents of the CoBE as and when necessary and that I shall also be liable to such revision or amendment(s).


Signature

Full Name (in capital letters)

Staff No.

Designation

Department and Company

	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022

Date

APPENDIX 2 – Interest Declaration Form



INTEREST DECLARATION FORM


The purpose of the declaration hereunder is to inform the interest between the employee and the Group. Any changes in the status must be notified immediately to the Group.

A. Shares Ownership

I hereby declare that I, or members of my immediate family am/ are:
(Please mark "X" where applicable)

- Not the beneficial owner(s) of 5% or more of the shares/ securities of any public or private companies.
- The beneficial owner(s) of 5% or more of the shares/ securities of the following public or private companies:

Name of Holder	Relationship	Name of Company Shares/ Securities Held	Nature of Company Business	Percentage of Holdings

	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
POLICY	Original Date	27.03.2018
	Revision Date	28.08.2022

B. Other Interests

Please mark (X) where applicable


- I have nothing to declare.
 I hereby declare the following interests: -

Directorships Company of which I am a director	Name of Company:	
	Address:	
	Nature of Business:	
	Remuneration:	
Partnerships Company with which I am a partner	Name of Company:	
	Address:	
	Nature of Business:	
Business and Employment Additional business, or other employment interest that I am involved in.	Name of Company:	
	Address:	
	Nature of Business:	
Consultancy Company or individual on behalf of whom consultancy is undertaken	Name of Company:	
	Address:	
	Nature of Business:	
	Frequency or Volume of Work:	
Family Relationship/ Personal Close Relationship/ Relationship with personnel who have authority within the Group or political personnel Individual of whom I have relationship with	Name of Individual:	
	Address:	
	Nature of Relationship:	
Other relevant interests		

I hereby declare that to the best of my knowledge, the information disclosed on this form is complete and accurate in accordance with the CoBE. I understand that any false declaration or omission may lead to disciplinary proceeding/ action.

Signature : _____

Full Name : _____

 POLICY	Document name	Code of Business Ethics
	Document Ref. No.	TDMB/CISD/0822/CoBE(2.0)
	Original Date	27.03.2018
	Revision Date	28.08.2022

Staff No. : _____

Designation : _____

Department & Company: _____

Date : _____

Acknowledged by:

Signature : _____

Full Name : _____

Designation : _____

Department & Company: _____

Date : _____