



COMPLIANCE POLICY

TDM Berhad and its subsidiaries (“The Group”) are committed to conducting business responsibly and in accordance with the laws of the countries in which we operate. At TDM, compliance is a system of controls intended to provide a cost-beneficial level of assurance that the Group adheres to all applicable laws, regulatory requirements, and internal policies and procedures. This commitment is guided by our Compliance Framework.

The Group Compliance Policy is implemented through the following:

- a) All Directors, employees and third parties dealing with the Group shall strictly adhere to and comply with all applicable laws, rules and regulations, the Code of Business Ethics (CoBE), and the Group policies and procedures;
- b) All Directors, employees and third parties dealing with the Group must be aware of, fully understand, and perform their duties and responsibilities in relation to laws, rules, regulations, CoBE, and the Group policies and procedures. They shall also understand the consequences and damages resulting from non-compliance and negligent performance of their duties and responsibilities, including disciplinary actions according to TDM work regulations;
- c) All Directors, employees and third parties dealing with the Group shall respect and abide by all domestic and international laws, rules, and regulations where the company conducts business, recognising that illegal activities will not be tolerated;
- d) All Directors, employees and third parties dealing with the Group must raise their awareness by communicating, promoting, and supporting knowledge and understanding, and by creating a culture of honesty and integrity, including strictly complying with rules and regulations;
- e) The Board Risk, Compliance & Sustainability Committee is assigned to conduct regular reviews and monitor financial and non-financial risks, including compliance risks, that the Group faces;
- f) TDM has assigned the Management Investment, Risk & Compliance Committee to implement the Board-approved framework, policies and procedures on risks and controls of the Group, ensuring the effectiveness of risk management and compliance activities within the Group;
- g) TDM has established guidelines for effective governance, control, and risk prevention to support and strengthen the operations that are consistent with laws, rules and regulations, including support in various areas, that are necessary for operations such as personnel, resources, and knowledge to ensure that all Directors, employees and third parties dealing with the Group will be able to comply with the rules correctly and completely; and
- h) Director, employee or third party who provides information or reports about any misconduct or act that appears to be violating or not comply with applicable laws, rules and regulations, will have protection and receive fair treatment according to the TDM’s Whistleblowing Policy.

This policy was approved by the Board of Directors of TDM Berhad on 26 August 2024.