

## **PETALING TIN BERHAD**

### **CODE OF CONDUCT AND ETHICS**

The Company is committed to achieving sustainable performance and delivering value to our customers and shareholders by adhering to the best practice in corporate governance and in accordance with all applicable laws, regulations and relevant policies.

The Code of Conduct and Ethics (the Code) states the standards of responsibility and obligations and promotes fair dealing, integrity and ethical conduct amongst the Company's directors, management and employees.

#### **I. Principles**

##### **1. Regulatory Compliance**

1.1 The Company operates in a highly regulated corporate and business environment and its activities are thus subject to numerous laws, regulations and licensing conditions. The Company must ensure compliance with applicable laws, regulations and license conditions applicable to its activities. If in doubt, to seek advice from the Head of Group Human Resources.

1.2 Our activities and the business activities of the Company must be conducted in compliance with applicable laws and regulations.

##### **2. Health and Safety**

2.1 Health and safety, social responsibility and environmental sustainability are essential to maintaining our social license to operate. Safe operations depend on sound plant and equipment and more importantly, our commitment in preventing workplace-related injuries and illnesses.

2.2 The Company is committed to provide effective support and training for its employees to assist them in their responsibilities of ensuring a safe workplace whilst reducing the environmental footprint of their activities.

##### **3. Fair Dealing and Equality**

3.1 The aim is to provide an environment in which ourselves, customers, suppliers and other business partners are treated fairly and equitably irrespective of, amongst others, gender, ethnicity, age, disability and religion. We are to conduct ourselves and the business activities of the Group to facilitate achievement of this aim.

- 3.2 The Group will compete effectively and fairly in the markets in which it operates. It will be ethical and responsible in the way it presents products and services to its customers, uses its market power and its pricing practices.
- 3.3 We are not permitted to solicit or accept any gift or personal benefit in connection with our work. However, the Company acknowledges that modest gifts and reasonable entertainment, which are of socially acceptable nature and value, form part of the normal course of business.
- 3.4 The Company is committed to developing and maintaining a diverse workforce and to providing a work environment in which everyone is treated fairly and with respect, has the opportunity to contribute to business success and to realize their potential.

#### 4. Confidentiality and Safeguarding Assets

- 4.1 We must keep confidential all information that would reasonably be considered to be confidential, including but not limited to terms and conditions of contracts entered into by the Company, employee and customer details, performance and financial details and policies and procedures of the Company.
- 4.2 The Company will only collect and retain confidential information that is necessary to meet business requirements, and as permitted by law.
- 4.3 Assets and confidential information should be carefully protected and we are responsible for safeguarding and appropriately using the same whilst under our control. The Company assets and confidential information must not be used for personal gain or for any other reason that is not in the best interests of the Company.
- 4.4 Intellectual property can be an invention, trademark, original design or the practical application or expression of a good idea that has commercial value. We must work to safeguard the Company's intellectual property from use by outsiders.
- 4.5 Misappropriation of property owned by the Company staff, customers or suppliers will not be tolerated. Any misappropriation should be immediately reported and properly investigated. Appropriate disciplinary and/or legal action will be taken.

#### 5. Conflict of Interest

- 5.1 We must not act or do anything that may conflict with our responsibilities to the Company or compromise, or appear to compromise the quality of our work performance, our commitment to our work or our ability to make impartial business decisions. We are to act in the best interests of the Company at all times.

5.2 If we fail to voluntarily make the required disclosure and the Company becomes aware of an instance of conflict of interest that ought to be disclosed, the Company shall take a serious view of the matter and consider suitable disciplinary action.

6. Bribery and Corruption

6.1 We are expected to act consistently with the laws and policies on anti-corruption in conducting business legally, ethically and with integrity.

6.2 We shall not offer, give, solicit, or accept bribes in order to achieve business or personal advantages for ourselves or others or engage in any transaction that can be construed as having contravened the anti-corruption law.

6.3 Item considered bribes may be in any form, monetary or otherwise including but not limited to unauthorized remuneration such as referral fee, commission or other similar compensation, materials, goods, services, gifts, business, amenities, premiums or discounts of an inappropriate value or of an unreasonable level or that are not generally offered to others or that are prohibited by law or may reasonably be viewed as having exceeded the boundaries of ethical and lawful business practice.

6.4 The Company shall assess the appropriateness of the actions by assessing if the action could influence or may influence the business relationship, expose the Company to potential civil liability, significant reputational harm and/or undermine the trust of the Company's customers and shareholders.

6.5 Notwithstanding this, the Company's recognizes that the occasional acceptance or offer of modest gifts and entertainment may be a legitimate contribution to good business relationships, goodwill or as part of local culture. Generally, all invitation to business luncheons or dinners may be given or accepted.

7. Money Laundering

7.1 Money Laundering occurs when the criminal origin or nature of money or assets is hidden in legitimate business dealings, or when legitimate funds are used to support criminal activities, including terrorism. Offences covered by anti-money laundering legislation include prejudicing or obstructing an investigation and failing to report suspicious activity.

7.2 The Company does not condone, facilitate or support any activity that is associated with money laundering. We must be mindful of the need to protect the Company's reputation and ensuring compliance with the laws.

- 7.3 Our responsibilities include:-
- a) not knowingly deal with criminals, suspected criminals or the proceeds of crime.
  - b) act diligently to prevent the Company's products and services from being used to further money laundering.
  - c) apply the appropriate level of due diligence when entering into business relationships and where applicable, individual transactions.
  - d) mindful of the risk of the Company's business being abused for money laundering activities and to report any suspicious transactions to an immediate superior.

## 8. Insider Trading

- 8.1 Any information relating to or generated by the Company that is not publicly available through independent sources (e.g. newspaper, company website, social media page, Bursa website) is confidential and proprietary. We must safeguard any information that we have access to in the course of our daily duties or while discharging our responsibilities. Any unauthorized disclosure of such information may lead to serious damage to the Company's interest.
- 8.2 Those who have access to proprietary and confidential information on the Company or any third party that may impact the value of the Company's or the third party's shares which are publicly traded, are forbidden to make use of such information for personal gain or disclosing such information to others. Examples of such information are the Company's results announcement and proposed dividends, actual or potential material acquisitions, divestments, mergers, joint ventures or major developments in any material litigations.
- 8.3 We must ensure all transactions in the Company's shares comply with the procedures set out in the Bursa Listing Rules and the laws on insider trading.
- 8.4 We must always protect confidential or proprietary Company information and keep electronic and paper documents and files of confidential information in a secure place with access limited to authorized parties.
- 8.5 We must consult our respective Heads of Department if uncertain of the status of the information held.

## **II. Communication and Feedback Channels**

1. We or external parties are to report genuine suspicion of breaches of the Code without fear of retribution or reprisal.
2. The reporting of non-compliance with the Code may either be made to the Head of Group Human Resources or CEO or in accordance with the Whistleblower Policy (where relevant) and such reporting shall be in a safe environment which enables one to speak up without fear of victimization.

## **III. Review of Policy**

1. The Code is approved and adopted by the Board. The Board shall periodically review this code to ensure its effectiveness and appropriateness.
2. The Code is made available for reference in the Company's website at [www.petalingtin.com](http://www.petalingtin.com).