

PETALING TIN BHD

CODE OF CONDUCT AND ETHICS

The Company is committed to achieving sustainable performance and growth through delivering value to its stakeholders and shareholders by adhering to best practices 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 for Company employees 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.
- 1.2 The Company practices ongoing compliance with all applicable laws, regulations and license conditions relevant to its activities.

2. Health and Safety

- 2.1 Health and safety, social responsibility and environmental sustainability are the Company's ethical and moral obligation to operate in a safe, socially and environmentally responsible manner. This is important to give back to the communities the Company operates in and to the continued sustainability of the business. Safe operations depend not only on sound working environments but on the Company's commitment in preventing workplace-related accidents, injuries and illnesses.
- 2.2 The Company is committed to provide effective support and training for its employees in areas deemed at risk to further equip them with relevant knowledge in ensuring a safer workplace whilst reducing the relevant environmental footprint of their activities.

3. Fair Dealing and Equality

- 3.1 The company strives 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.

- 3.2 Company employees are to conduct themselves and operate fairly and effectively the business activities of the Group in an ethical and responsible manner to facilitate achievement of this aim.
- 3.3 Employees are not permitted to solicit or accept any gift or personal benefit in connection with their work to any advantage. However, the Company within reason acknowledges that modest gifts and reasonable entertainment, which are of reasonable and 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 workplace environment in which everyone is treated fairly with mutual respect to realize their potential and, has the opportunity to contribute to business success.

4. Confidentiality and Safeguarding Assets

- 4.1 Company employees 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 details, 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 Company assets and confidential information must at all times be carefully protected and safeguarded at all relevant times. 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 is otherwise defined as and not limited to an invention, trademark, original design or the practical application or expression of a good idea that has commercial value. Intellectual property of the Company is also deemed as an asset and confidential information and necessitates the same safeguarding and use as stated above.
- 4.5 Misappropriation of any assets or confidential information owned by the Company will not be tolerated. Any misappropriation shall be immediately reported and properly investigated and the appropriate disciplinary and/or legal action will be taken.

5. Conflict of Interest

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

5.2 In circumstances where employees have failed to disclose a conflict of interest and the Company becomes aware of such 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 Company employees are expected to act consistently with the laws and policies on anti-corruption in conducting business legally, ethically and with integrity.

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

6.3 Items considered bribes may constitute various forms, monetary or otherwise including but not limited to unauthorized remuneration such as referral fees, 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 practices.

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 within reason recognizes that the occasional acceptance or offer of modest gifts and reasonable 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. The Company is cognizant of the need to protect its operations, reputation, stakeholders and shareholders by ensuring ongoing compliance with all relevant laws.
- 7.3 The Company's responsibilities include and are not limited to:-
- a) Not knowingly engaging with criminals, suspected criminals or the proceeds derived from crime.
 - b) Acting diligently to prevent the Company's products and services from being used in any money laundering activity.
 - c) Applying appropriate levels of due diligence when entering into business relationships and business transactions.
 - d) Aware of the risks 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. Company employees must safeguard any information they have access to in the course of daily duties or while discharging responsibilities. Any unauthorized disclosure of such information may lead to serious damage to the Company where appropriate remedy will be sought.
- 8.2 Employees with 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 The Company must ensure all transactions in the Company's shares comply with the procedures as set out in the Bursa Listing Rules and the laws on insider trading.

- 8.4 The Company 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 Employees must consult their respective Heads of Department if uncertain of the status of the information held.

II. Communication and Feedback Channels

1. Company employees 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 that 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.