



CODE OF BUSINESS CONDUCTS AND ETHICS

Purpose:

Tek Seng Holdings Berhad ('the Company') recognises the importance in conducting its affairs ethically and lawfully. This Code of Conduct has been endorsed by the Board and is subject to periodical review to ensure its relevance and compliance.

BASIC POLICIES

1. Compliance with Laws

The Company will conduct its business and affairs in compliance with all laws, rules, and regulations and in accordance with the Company's high ethical standards.

2. Marketing and Sales

The Company will represent its products and services accurately and will comply with applicable regulatory and legal requirements governing the marketing and sale of its products and services.

3. Competitive Practices

The Company will compete for all business opportunities vigorously, fairly, ethically and legally.

4. Work Environment

The Company will maintain a safe and drug-free work place that is free from discrimination and harassment based on race, colour, creed, religion, sex, age, disability, national origin, ancestry, citizenship, armed forces service, marital or veteran status, sexual orientation, or any other impermissible factor.

5. Recording and Reporting Information

In recognition of the fact that accurate information is essential to the Company's ability to satisfy legal and regulatory obligations, all employees and directors will record and report all information accurately and honestly. No employee or director will sign or submit, or permit others to sign or submit on behalf of the Company, any document or statement that he or she knows or has reason to believe is false.



6. Fair Dealing

The Company will not take unfair advantages through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing or practice with its stakeholders.

7. Confidential Information

Employees are prohibited to use, for his or her own personal gain, or disclose to any third party, any confidential or proprietary information that he or she obtained as a result of his or her employment with or relationship to the Company. Confidential or proprietary information includes all non-public information that might be of use to competitors or harmful to the Company and its customers if disclosed.

8. Corporate Opportunities

Employees are prohibited from :

- a. taking for themselves personally opportunities that are discovered through the use of corporate property, information, or position;
- b. using corporate property, information, or position for personal gain, or
- c. competing with the Company

9. Conflicts of Interest

A conflict of interest occurs when a person's private interest or outside activities interfere or appear to interfere in any way with the Company's objectives and harmful and detrimental to the Company. Any conflict of interests or potential conflict of interest must be disclosed in writing to the Management in charge of the applicable division, subsidiary or operating unit, or to the Managing Director, for a resolution.

10. Protection and Proper Use of Company Assets

All employees will take appropriate actions to protect the Company's assets and ensure their efficient use for legitimate business purposes.



11. Accepting & Providing Gifts and other Benefits

Employees should not give or accept gifts or any other benefit or privilege that would in any way influence or appear to influence any business decision or gain an unfair advantage to or from business partners.

12. Bribery and Corruption

The Company 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. Employees shall not offer, give, solicit or accept any bribes in order to achieve any business or personal advantage for themselves or others or engage in any transaction that contravene any applicable anti-bribery or anti-corruption laws.

13. Money Laundering

Employees should always ensure that they are conducting business with reputable customers, for legitimate business purposes and with legitimate funds. Employees need to be mindful of the risk of the Company's business being used for money laundering activities and if they suspect money laundering activities, they should report it to their respective Head of Department or the relevant person designated by the Company.

14. Whistleblower

The company has put in place a Whistleblowing Policy to uphold the highest standards of integrity and ethical behaviour in the conduct of its business and operations. The policy enables Employees and members of the public to raise genuine concerns regarding actual or suspected unethical, unlawful, illegal, wrongful or other improper conduct and also sets out the process for managing any action, intimidation or harassment against a whistleblower.



COMPLIANCE

1. The Management in charge of division, subsidiary, or operating unit is responsible for ensuring that the employees understand and comply with this Code and to create a work environment in which compliance is expected and rewarded.
2. Any waiver of the policies or procedures set forth in this Code may be only authorised by the Board of Directors.
3. Any violation of the policies or procedures set forth in this Code should be reported immediately to the Management in charge of the applicable division, subsidiary, or operating unit. The identity of the person or persons making a report will remain confidential except on a "need to know" basis. Reporting may be anonymous. The Management will notify the Executive Chairman of any reports that they receive.
4. The Company will promptly investigate any alleged violation of this Code and take necessary disciplinary action, including termination of employment where appropriate.
5. Questions concerning this Code should be directed to the Management in charge of the applicable division, subsidiary or operating unit.

Date : 22 February 2024