CODE OF CONDUCT

The Code of Conduct is aimed to support all employees in maintaining professional standards and executing their respective duties in a professional, honest, respectful and ethical manner at all times. Employers and employees must refrain from acting in a manner which compromises or undermines the core values of the Company.

Please be aware that the contents of this Code of Conduct are non exhaustive.

1.1 ZERO TOLERANCE POLICY

The Company observes a ***Zero Tolerance Policy*** and will not excuse or tolerate any actions or behaviour which results in:

Child Labour:

It is the policy of TIONG TAT PRINTING INDUSTRY SDN BHD to never hire child labour. "Child labour" refers to work that deprives children of their childhood and affects their schooling, their potential and their dignity. It's work that's harmful to them mentally, physically and socially. In this policy, we refer to "child" as people who are younger than [*18*] years of age. We have age-verification procedures that are effectively implemented, so that every personnel file contains copies of the identification documents (such as birth certificates, national ID cards or school certificates) submitted by applicants.

Underage Labour Remediation Policy:

If for any reason (i.e oversight, the employee misrepresenting their age on documentation, false/incorrect identification documents, etc), the company finds that a child worker is in its employment, the company recognizes that the safety and protection of the child is paramount. Therefore, in the event a child worker is found to be in the employee of the organization, one of the following will be done depending on the child's nationality:

- If the Child is a Malaysian national, or Suspected Malaysian national, the company shall contact the Department of Social Welfare Malaysia (JKM), Ministry of Women, Family and Community Development and seek their guidance on remediating the situation.
- If the Child is a foreign National or suspected foreign national, the company shall contact the responsible embassy representing the child and seek their guidance on remediating the situation.

In all cases the company shall ensure no harm comes to the newly identified child.

Forced Labour:

No forced labour is permitted which is the use of physical punishment confinement, threats of violence or other forms of physical, sexual, psychological or verbal harassment or abuse as a method of discipline or control. This includes:

- Prison Labor: Work performed by incarcerated individuals as a requirement of their sentence.
- Indentured Labor: Work performed by individuals contractually bound to their employer for a designated time period, usually in return for payment of travel and living expenses.
- Bonded Labor: Work performed by individuals who are subjected to loans that they are required to pay off through low wages by the lender and employer.

Discrimination:

Which is any conduct or behaviour which may constitute as discrimination on the grounds of discriminated against on the grounds of age, marital or family status, race, religious belief, nationality, ethnic origin, gender (including gender re-assignment), disability, or indeed any other unjustifiable requirement of a like nature.

Harassment:

This constitutes offensive treatment through vindictive, cruel, malicious or humiliating attempts by any person to undermine an individual employee or groups of employees. Sexual Harassment is defined as: Any unwanted conduct of a sexual nature having the effect of verbal, non-verbal, visual, psychological, or physical harassment that might, on reasonable grounds, be perceived by the recipient as placing a condition of a sexual nature on his employment or that might, on reasonable grounds, be perceived by the recipient as an offence or humiliation or a threat to his well-being but has no direct link to his employment.

1.2 PROFESSIONAL AND PERSONAL CONDUCT

1.2.1 All employees are expected to behave in accordance with the Company Values of Mutual Trust & Respect, Honesty & Integrity, Personal Accountability, People First and Tenacity. In line with these values, the personal and professional conduct of all employees should be such that it contributes to a productive and harmonious workplace.

1.2.2 As such, employees should always ensure:

(a) Compliance with all statutory and regulatory requirements;

(b) Adherence and observation of all Company Policies;

(c) That they behave in a manner which minimises any risk of loss or damage to the Company's property, image or lowering of its productivity or quality standard or the lowering of the general morale in the Company;

(d) That they conduct themselves with politeness and dignity and responsibility at all times and not to indulge in any act or conduct that may cause damage to the good name of the Company or to their own integrity, reputation or credibility or bring the Company into disrepute;

(e) That decisions are made fairly and without bias, using the best factual information available;

(f) Not to conduct themselves in a manner that can reasonably be construed as being negligent, careless or lacking in efficiency. Any payment that has to be made by the Company as a result of the employee's negligence or carelessness or as a result of action taken without approval shall be recoverable from the employee's by ways that the Company deems fit;

(g) Continuous development within their respective fields of expertise by keeping up-to-date with all industry developments;

(h) The exercise of their best judgement when making decisions;

(i) Good relations are maintained with those for whom or with whom they work and to avoid obstructive behaviour or actions which threaten their health or safety;

(j) Maintaining adequate documentation to support all decisions made and actions taken;

(k) Treating all other Company employees with the highest politeness; and

(l) Acting responsibly and reporting any known insensitive and unethical behaviour, or breach of Company Policies by another employee to a Head of Department or the Human Resource Department.

1.3 DRESS AND APPEARANCE

1.3.1 All employees within the Management Department shall dress in presentable and formal office attire so as to present a professional appearance at all times and not impair the image of the Company.

1.3.2 All employees working in the Production Department shall dressed in company uniform and adhered to the use of personnel protective equipment at all times where it required. This includes overtime and work done on off-day, rest day or paid public holidays.

1.4 CONFIDENTIALITY

'Confidential Information' includes but is not limited to any confidential information relating to and/or derived from the business organisation, transactions, finances, technology, processes, specifications, methods, designs, formulae, technology, business practices, trade secrets and business activities or affairs, of and concerning the Company and all its existing and/or potential customers and suppliers.

1.4.1 All employees must not to use, disclose or duplicate any Confidential Information in a manner which may injure, cause loss directly or indirectly to the Company, its existing business and any other business it may venture into and in a manner that is contrary to the proper performance of their employment duties unless, authorised or required by their duties or a court of competent jurisdiction.

1.4.2 Employees shall also use their best actions to prevent the use or disclosure to or by any person, firm or organization, other than in the course of the proper performance of their employment duties or with the consent of the Company, any Confidential Information which comes to during engagement.

1.4.3 This restriction shall apply during and after the termination of the employee's engagement without any time limit but shall cease to apply to information or knowledge which has in its entirety become public knowledge otherwise than through any unauthorised disclosure or other breach. Accordingly, all information, records, manuals, documents must be returned to the Company immediately upon the employee ceasing employment with the Company.

1.4.4 Employees shall also not permit any person to assist them or the Company in the provision of services which entails them being exposed to Confidential Information unless that person has signed a confidentiality undertaking in the form approved by the Company.

1.5 EMPLOYEE ACCESS & IDENTIFICATION.

1.5.1 All management employees will have their thumbprints registered via a biometric system which identifies them as a company employee providing an access record of attendances and whereabouts during working hours. Any tampering or misuse of the biometric system will result in serious disciplinary action.

1.6 COMPANY RESOURCES AND FACILITIES.

1.6.1 Company facilities and resources must be used responsibly. Misuse or damage to Company property will not be tolerated. Accordingly, the facilities and resources must be looked after, kept clean and utilised for business related purposes only and are provided to enable employees to carry out their duties efficiently and effectively.

1.6.2 Company communication facilities are provided to facilitate internal and external communication for the Company. As such, facilities like electronic mail, internet, telephone systems and facsimile in particular, must not be utilised for personal use save for exceptional circumstances under which prior consent must be obtained from the HR Department. Accordingly, personal telephone calls may only be made or received in cases of emergency on the Company telephone system as the lines are to remain open for business calls.

1.6.3 The Company monitors the systems and network for unauthorised use. Misuse of resources and facilities shall be taken very seriously by the Company and result in disciplinary action.

1.6.4 INTELLECTUAL PROPERTY

All product and packaging designs, records, documents, papers and other materials produced or acquired by an employee in the course of employment with the Company, using Company resources, facilities and time, shall become the property of the Company.

1.6.5 COPYRIGHT

The Company uses its best endeavours to comply with all legislative, regulatory, and contractual obligations relating to copyright. As such, all employees are expected to do the same at all times.

Employees who breach the Copyright Act do so at their own risk and accordingly shall assume all liability, including the possibility of disciplinary action for copyright infringement both by the Company and the relevant authority.

1.6.6 INFORMATION TECHNOLOGY

Company IT facilities includes electronic mail, internet, desktop and laptop computers, facsimile, printers, and scanners. Use of these resources for unauthorised purposes including accessing or downloading unauthorised material or information is prohibited.

The software used by employees has been obtained under license agreements which the Company accords to. As a result, employees are to refrain from downloading and/or installing any programmes or software to their computer without prior consent. Installation of unlicensed and pirated software is strictly prohibited. Non-conformance will result in serious disciplinary action.

1.7 CONFLICT OF INTEREST

When a person is employed by the Company, it is the Company's understanding that the Company is his primary employer. Other employment or any involvement directly or indirectly in the management of any Company or participation in any business activities including family enterprises whether for gain or otherwise or undertaking any form of paid work including self-employment that is in conflict to his work schedule and/or distracts his attention or duties to the Company is considered a breach of his contract of employment, unless prior express consent has been obtained from the Company.

1.8 PUBLIC STATEMENTS AND MISREPRESENTATIONS

"Public statement" includes the making of any statement or comments to the press or the public or in the course of any lecture or speech or the broadcasting thereof by sound or vision or through the electronic media.

1.8.1 All statements and representations made for and on behalf of the Company must be made only by the Company's authorised or appointed spokesperson.

1.8.2 All employees shall not either orally, in writing or in any other form make or circulate any public statements on:

(a) The policies or decisions of the Company on any issues;

(b) The work of the department in which he is or was employed where such statement may reasonably be regarded as indicative of the policy of the Company or may embarrass or be likely to embarrass the Company; and

(c) Measures taken by the Company on any official matters taken or carried out by the employees.

1.8.3 All employees shall not make use of the Company's name or stationery or logo or trademarks in a private capacity.

1.8.4 All employees shall not, at any time, criticise or comment on other companies, so much so that it may cause the Company to be used for defamation.

1.9 FINANCIAL TRANSACTION

1.9.1 Unauthorised financial transactions listed below are instances prohibited within the Company's premise unless approved by the Company:

(a) Any type of gambling;

(b) Donations for political;

(c) Private trade or sales including private insurance arrangements; and

(d) Lending or borrowing money in circumstances prejudicial to discipline.

1.9.2 Donations for compassionate or calamities reason such as death or disability of employee or accident or natural disaster of employee or his family shall be communicated to HRD to obtain Company's approval before such donations are collected.

1.10 HOUSEKEEPING

All employees are responsible to keep their work place clean and tidy at all times in accordance with the provided Good Manufacturing Practices and Hygiene Practices. All company property and company issued items must be properly looked after and maintained.

1.11 GIFTS

In order to protect against undue obligations of an employee to customers or suppliers or any individual who have business dealings with the Company whether existing or potential, no employee may accept any gifts whether in cash or kind from such parties without the express approval from the Company. This principle applies not only to tangible gifts but also to vouchers, products / service discounts off normal retail prices and entertainment at the expense of the customer or supplier.

1.12 COMPLIANCE WITH APPLICABLE LAWS AND STANDARDS

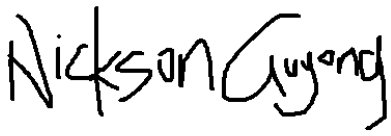
All business activities of Tiong Tat Printing Industry and Its suppliers must conform to all applicable national and local legal requirements, customs, and published industry standards pertaining to employment and manufacturing. If statutory requirements and published industry standards conflict, Tiong Tat Printing Industry and suppliers must, at minimum, be in compliance with the one which, by law, take priority.

1.13 FREEDOM OF ASSOCIATION

In Tiong Tat Printing Industry employees have the rights of freedom of association and collective bargaining. We respect the right of our employees to choose whether or not to join a trade union without influence or interference from management.

ALL EMPLOYEES ARE BOUND BY THIS CODE OF CONDUCT AND ANY VIOLATIONS MAY RESULT IN SERIOUS DISCIPLINARY ACTION.

AN EMPLOYEE, WHO REQUIRES CLARIFICATION ON THE CONTENT OR APPLICATION OF THIS CODE, SHOULD NOT HESITATE TO CONTACT THEIR RESPECTIVE HEAD OF DEPARTMENT OR THE HUMAN RESOURCE DEPARTMENT.



General Manager

Date: 1st October 2015