



Topmix Berhad

(Incorporated in Malaysia)

Code of Conduct Policy

TM-ABC003

Revision No. 1.0

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1. Policy brief & purpose

This Code of Conduct policy outlines the ethical conduct of Topmix Berhad (“Topmix” or “the Company”) and its subsidiaries (collectively referred to as the “Group”) regarding employees’ behaviour towards their colleagues, supervisors and overall organisation.

We promote freedom of expression and open communication. But we expect all employees to follow our code of conduct. They should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well-organized, respectful and collaborative environment.

2. Scope

This policy applies to all Directors and employees regardless of employment agreement or rank.

3. Code of Conduct

All Directors and employees are bound by their contract to follow our Code of Conduct while performing their duties. Our Code of Conduct are as below:

a) Compliance with law

The Group will comply with all relevant applicable laws, rules and regulations. All Directors and employees must protect our Group’s legality. They should comply with all environmental, safety and related laws. We expect all Directors and employees to be ethical and responsible when dealing with our Group’s finances, products, partnerships and public image.

b) Respect in the workplace

All employees should respect their colleagues. Our organization does not tolerate any kind of discriminatory behaviour, harassment or victimization. Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

c) Protection of the Group’s Property

All Directors and employees should treat our Group’s property, whether tangible or intangible, with respect and care.

All persons:

- Shouldn’t misuse the Group’s equipment or use it frivolously.
- Should respect all kinds of intellectual property. This includes trademarks, copyright and other property (information, reports etc.) Employees should use them only to complete their job duties.
- Employees should protect the Group’s facilities and other material properties (e.g. the Group’s cars) from damage and vandalism, whenever possible.

d) Professionalism

All employees must show integrity and professionalism in the workplace:

- **Personal appearance**

All employees must follow our dress code and personal appearance that reference to employee handbook.

- **Corruption**

We discourage all Directors and employees from accepting gifts from clients, partners or other stakeholders. We prohibit bribes for the benefit of any external or internal party. Please refer to our Anti-Bribery and Corruption Policy.

- **Job duties and authority**

All Directors and employees should fulfil their job duties with integrity and respect toward customers, stakeholders and the community. Supervisors and managers must not abuse their authority. We expect them to delegate duties to their team members taking into account their competences and workload. Likewise, we expect team members to follow team leaders' instructions and complete their duties with skill and in a timely manner.

- **Sexual harassment and violence**

The Group is committed to provide a working environment that is free from sexual harassment and violence. Any questions concerning such issues should be directed to either the individuals' Superior/ Head of Department or Human Resources Department. For detail please aligned with employment handbook.

- **Conflict of interest**

We expect all Directors and employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties. All persons should avoid using their official position or any information made available to benefit themselves or relatives or friends. All persons must declare any relationships or any situations where conflict may arise to their Head of Department or Human Resource Department. For detail please aligned with employment handbook.

- **Confidentiality**

All Directors and employees must maintain the confidentiality of confidential information or business secret entrusted to them by the Company, except when disclosure is authorised by the laws and regulations. Confidential information includes, but is not limited to, non-public information that might affect the business of the Group or its share price, be of use to competitors of the Group, harmful to the Group or its customers if disclosed.

The obligation to preserve confidential information continues even after employment ends.

- **Insider Trading**

The Group prohibits insider trading of its listed securities. All Directors and employees who have access to confidential information are not allowed to use or share the information for stock trading purposes.

Violation of this policy can result in civil and criminal penalties.

4. Disciplinary actions

The Company may take disciplinary action against employees who repeatedly or intentionally fail to follow our code of conduct. Disciplinary actions will vary depending on the violation.

Possible consequences include:

- Demotion
- Reprimand
- Suspension or termination for more serious offenses.
- Detraction of benefits for a definite or indefinite time.

We may take legal action in cases of corruption, theft, embezzlement or other unlawful behaviour.

5. Communication of Policy

This Policy is a public document published on our website and shall be communicated to all our employees. Our employees are required to understand this policy.

6. Review of Policy

This policy shall be reviewed by the Board every three (3) years or as and when required when internal or external events warrants a more frequent review to be undertaken.

The Board adopted this policy on 1 March 2022 and reviewed it on 18 April 2024.

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