

TFP Solutions Berhad



Code of Business Conduct

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Introduction

Since TFP's inception, our business practices have been governed by integrity, honesty, fair dealing and full compliance with all applicable laws. TFP and its employees have upheld and lived this commitment in their everyday responsibilities ever since, and TFP's reputation remains one of the Company's most important assets today. Our corporate eight guiding principle's values that guide our business operation are as follows:

1. SELF-BELIEVE - We believe we can make a difference in the IT world
2. RESPECT - We treat people with respect, to get respect
3. COMMITMENT - We work with passion to achieve our objectives
4. INNOVATION - We innovate to function differently
5. HONESTY - We are trustworthy and open. Straight to the point
6. SHARING - We share tools, ideas and knowledge with others
7. RESPONSIBILITY - We are answerable for our actions and for our team
8. TEAMWORK - We believe in "One Team One Goal" concept

The TFP Corporate Business Principles prescribe certain values and principles which TFP has committed to conduct during our business operation. This Code of Business Conduct specifies and helps the continued implementation of our corporate eight guiding principles by establishing certain non-negotiable minimum standards of behaviour in key areas. The nature of this Code is not meant to cover all possible situations that may occur. It is designed to provide a frame of reference against which to measure any activities. Employees should seek guidance when they are in doubt about the proper course of action in a given situation, as it is the ultimate responsibility of each employee to "do the right thing", a responsibility that cannot be delegated.

Employees should always be guided by the following basic principles:

- avoid any conduct that could damage or risk TFP or its reputation;
- act legally and honestly;
- put the Company's interests ahead of personal or other interests.

United Nation Global Compact Principles

In addition to TFP's eight guiding principle values , TFP had been a UN Global Compact signatories since 2009 have been complying and disclosing the following set of core values as our business conduct:

1. Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights;

Principle 2: make sure that they are not complicit in human rights abuses.

2. Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

3. Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

4. Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery



TFP Code of Business Conduct

1. Compliance with laws, rules and regulations

We respect the law at all times TFP and its employees are bound by the law. Compliance with all applicable laws and regulations must never be compromised.

Additionally, employees shall adhere to internal rules and regulations as they apply in a given situation. Those internal rules are specific to the Company and may go beyond what is required by the law.

2. Conflicts of Interest

We will always act in the best interests of TFP. A conflict of interest occurs when personal interests of an employee or the interests of a third party compete with the interests of TFP. In such a situation, it can be difficult for the employee to act fully in the best interests of TFP. Employees shall avoid conflicts of interest whenever possible. If a conflict of interest situation has occurred, or if an employee faces a situation that may involve or lead to a Conflict of Interest, the employee shall disclose it to his or her Line Manager and/or the HR to resolve the situation in a fair and transparent manner.

3. Confidential information

We value and protect our confidential information and we respect the confidential information of others confidential information consists of any information that is not or not yet public information. It includes trade secrets, business, marketing and service plans, consumer insights, engineering and manufacturing ideas, product recipes, designs, databases, records, salary information and any non-published financial or other data. TFP's continued success depends on the use of its confidential information and its nondisclosure

to third parties. Unless required by law or authorized by their management, employees shall not disclose confidential information or allow such disclosure. This obligation continues beyond the termination of employment. Furthermore, employees must use best efforts to avoid unintentional disclosure by applying special care when storing or transmitting confidential information.

TFP respects that third parties have a similar interest in protecting their confidential information. In case that third parties, such as joint venture partners, suppliers or

customers, share with TFP confidential information, such information shall be treated with the same care as if it was TFPs confidential information. In that same spirit, employees shall protect confidential information that they have obtained in the course of their prior employment.

4. Fraud, protection of company assets, accounting

Employees must never engage in fraudulent or any other dishonest conduct involving the property or assets or the financial reporting and accounting of TFP or any third party. This may not only entail disciplinary sanctions but also result in criminal charges. TFP's financial records are the basis for managing the Company's business and fulfilling its obligations to various stakeholders. Therefore, any financial record must be accurate and in line with TFP's accounting standards.

Employees shall safeguard and make only proper and efficient use of TFP's property. All employees shall seek to protect TFP's property from loss, damage, misuse, theft, fraud, embezzlement and destruction. These obligations cover both tangible and intangible assets, including trademarks, know-how, confidential or proprietary information and information systems. To the extent permitted under applicable law, the Company reserves the right to monitor and inspect how its assets are used by employees, including inspection of all e-mail, data and files kept on Company network terminals.

5. Discrimination and harassment

We embrace diversity and respect the personal dignity of our fellow employees. TFP respects the personal dignity, privacy and personal rights of every employee and is committed to maintaining a workplace free from discrimination and harassment. Therefore, employees must not discriminate on the basis of origin, nationality, religion, race, gender, age or sexual orientation, or engage in any kind of verbal or physical harassment based on any of the above or any other reason. Employees who feel that their workplace does not comply with the above principles are encouraged to raise their concerns with the HR Department.

6. Bribery and corruption

We condemn any form of bribery and Corruption. Employees must never, directly or through intermediaries, offer or promise any personal or improper financial or other advantage in order to obtain or retain a business or other advantage from a third party, whether public or private. Nor must they accept any such advantage in return for any preferential treatment of a third party. Moreover, employees must refrain from any activity

or behaviour that could give rise to the appearance or suspicion of such conduct or the attempt thereof. Employees should be aware that the offering or giving of improper benefits in order to influence the decision of the recipient, even if he or she is not a government official, may not only entail disciplinary sanctions but also result in criminal charges. Improper benefits may consist of anything of value for the recipient, including employment or consultancy contracts for closely related parties.. Any such, contributions and any deviations from such policy must be approved by the Managing Director of the company.

Failure to comply

We will consult the Code, comply with its provisions and seek guidance where needed. It is each employee's responsibility to ensure full compliance with all provisions of this Code and to seek guidance where necessary from their Line Manager, or from the HR or the Legal. To "do the right thing" and to ensure the highest standards of integrity is each employee's personal responsibility that cannot be delegated. When in doubt, employees should always be guided by the basic principles stated in the introduction to this Code. Any failure to comply with this Code may result in disciplinary action, including the possibility of dismissal and, if warranted, legal proceedings or criminal sanctions.

Reporting illegal or non-compliant conduct

TFP take responsibility for ensuring that we all act with integrity in all situations. Employees shall report any practices or actions believed to be inappropriate under this Code or even illegal to their Line Managers or the appropriate members of the HR. If it is appropriate, in view of the nature of the reported matter, reports of violations may be made directly to higher levels including the Managing Director or Executive Directors of TFP. When in doubt, employees should always be guided by the basic principles stated in the introduction to this Code. Any failure to comply with this Code may result in disciplinary action, including the possibility of dismissal and, if warranted, legal proceedings or criminal sanctions.

Where appropriate, complaints may be made on confidential basis thorough appropriate channels. All complaints shall be properly investigated. TFP prohibits retaliation against any employee for such reports made in good faith, while it also protects the rights of the incriminated person.