



## **TH PROPERTIES SDN BHD**

(Company Registration No: 198001010120 (63904-D))

### **CODE OF SUPPLIER ETHICS VERSION 0/2023**

This Policy is applicable to TH Properties Sdn Bhd and Subsidiaries

Approved by Board of Directors on 01<sup>st</sup> November 2023

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		Revision No.	00
		Effective Date	01 <sup>st</sup> November 2023

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## 1.0 INTRODUCTION

This Supplier Code of Supplier Ethics outlines the principles and the level of behaviour expected from each supplier, their employees, subcontractors, and sub suppliers TH PROP to meet in preparation of goods and services to the company.

To support compliance with this code, suppliers shall ensure that the code is shared with all individuals assigned to perform work for or on behalf of TH PROP, and all related duties with TH PROP implemented by individuals with skills, expertise and certification are required to uphold principles and meet the standards in the code.

The principles of the code are in line with the vision and mission of TH PROP to maintain high standards in corporate governance TH in improving accountability, transparency, integrity, and sustainability in the acquisition of TH to reduce and eradicate the symptoms of corruption.

## 2.0 THE PRINCIPLES

TH PROP expects suppliers to conduct business according to high ethical standards, including compliance with the following principles:

### 2.1 HONESTLY EXECUTE RESPONSIBILITY

**2.1.1** All suppliers and their representatives shall conduct business transactions and activities with honesty, trust, responsibility and integrity. In addition, all suppliers and their representatives shall:

- Record and report honestly and accurately all business information.
- Protect and take care of TH's physical and intellectual assets, including real estate, supplies and equipment, when authorized by TH to use those assets.
- Ensure all records, communications and disclosures relating to TH PROP are made fully, fairly, timely and understandable.

### 2.2 COMPLY WITH THE LAW

**2.2.1** All suppliers and their representatives associated with TH PROP are required to adopt and comply with all TH regulations and their amendments from time to time when conducting their business activities. Furthermore, all suppliers and their representatives are obligated to:

- Comply with the terms and conditions that have been agreed in the contract agreement.
- Comply with all civil and criminal laws and regulations of the country.
- Comply with the laws regarding bribery and bribery, including the Prevention of Corruption Act 1997 (Act 575).

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- Comply with all environmental laws and regulations relating to hazardous materials, air emissions, waste materials and waste.

## **2.3 AVOID CORRUPTION**

**2.3.1** Will not, directly or indirectly, request, offer, accept, give, or promise to give any reward in the form of money, goods or services to any TH PROP member in return for a decision, opinion, vote or other action that affects any procurement decision. This policy does not apply to the receipt or giving of gifts, hospitality or entertainment by TH PROP employees from or to relatives, colleagues, or acquaintances who have neither current nor foreseen current or future business dealings with TH PROP. In addition, all suppliers and their representatives shall:

- Not complicit in corrupt activities.
- Immediately report to the TH PROP management if there is corruption or attempted corruption by members of TH PROP or other suppliers.

## **2.4 AVOIDING CONFLICT OF INTEREST**

**2.4.1** It is mandatory for all TH PROP suppliers and their representatives to abstain from engaging in actions that could potentially lead to a conflict of interest in procurement affairs. For instance, this might involve a supplier having a familial or business relationship with shareholders, members of the tender committee, or other individuals within TH PROP.

**2.4.2** Suppliers who have a conflict or potential conflict of interest with any TH member must immediately inform the TH PROP management either before or after the appointment and selection.

**2.4.3** TH's management reserves the right to decide whether the supplier should withdraw or otherwise.

**2.4.4** When involved in work related to TH PROP, the supplier must not accept any job or engage in any activity that may create elements of conflict or cause a conflict of interest.

## **2.5 GIFT**

**2.5.1** All TH PROP suppliers and their representatives are required to comply with TH PROP Gift, Entertainment and Hospitality Policy.

## **2.6 RESPONSIBILITY FOR CONFIDENTIAL INFORMATION AND ASSET**

### **2.6.1 Confidential Information**

**2.6.1.1** Suppliers shall maintain and protect the confidentiality, integrity and existing information entrusted to them by TH PROP unless TH

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authorizes the disclosure or the information is required by law and court.

**2.6.1.2** Confidential information is proprietary information of TH PROP or a third party used by TH PROP, which, if disclosed or modified by unauthorized individuals, may result in the risk of financial loss and degrade the reputation and performance of TH PROP.

**2.6.2 TH PROP Asset**

**2.6.2.1** All TH PROP suppliers and their representatives shall comply with TH PROP's intellectual property rights, including but not limited to copyrights, patents, trademarks, and trade secrets. Information technology and systems provided by TH PROP may only be utilized for activities related to TH PROP's business.

**2.6.2.2** Suppliers and their representatives are prohibited from using the technology and systems provided by TH PROP to create, access, store, print, request or transmit any material that is harassing, threatening, abusive, obscene or transmit any false, insulting or malicious communication.

**2.7 THE IMPORTANCE OF QUALITY AND STANDARDS SKILLS**

**2.7.1** All TH PROP suppliers and their representatives must always provide and improve ethical standards and high work quality when completing transactions. Furthermore, all suppliers and their representatives shall:

- Obtain the license or permit required as a supplier of goods or services for TH PROP.
- Provide a highly skilled, sufficient, and quality workforce in completing transactions.
- Use and supply equipment that meets the specified quality to carry out responsible activities.

**2.8 AVOID ANTI-COMPETITIVE PRACTICES**

**2.8.1** All TH PROP suppliers and their representatives must practice healthy and transparent competition in procurement transactions, such as not providing false or misleading information to other suppliers concealing or destroying documents.

**2.8.2** In addition, all suppliers are prohibited from participating in any pact among suppliers, customers, or tenderers in procurement matters.

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## 2.9 RESPECT TO INDIVIDUAL AND COMMUNITY

**2.9.1** All suppliers must prioritize respect for all parties involved in a contract, including respect for values, history, religion, belief and community culture throughout the contract execution period.

**2.9.2** All suppliers must refrain from practicing discrimination in any form based on race, age, gender, state and country of origin, ability or sexual orientation during the execution of the contract.

**2.9.3** All suppliers must ensure that each of its employees is provided with a satisfactory work environment, treated fairly, paid with appropriate remuneration and assisted in terms of career development and welfare accordingly. At all times, acceptance or giving of a gift in the form of cash or cash equivalent is strictly prohibited. For the purpose of this policy, cash equivalent includes but is not limited to vouchers, discounts, coupons and commissions.

**2.10** An employee is prohibited from accepting other forms of gifts, which include but are not limited to valuable items, gratuity, favour, benefits, services, rebates, free/sponsored travel, trips and holidays, interest, entertainment, social events, vacation, leisure treatment, loan and debt settlement, either locally or abroad.

## 3.0 CODE COMPLIANCE

**3.1** Compliance with the principles, policies and regulations stated in this code is mandatory for all suppliers and their representatives who deal with TH PROP.

**3.2** Therefore, the supplier should:

- Read and understand this code.
- Immediately report non-compliance or violation of this code by any party to the appointed TH Management.
- Fully cooperate with any investigation conducted and ensure that staff or representatives of suppliers or subcontractors are educated to understand and adhere to this code of ethics.

**3.3** Any concerns or complaints can be raised through the Information Notification Policy (Whistleblowing) or by directly contacting TH PROP's Integrity Officer. The identity of the complainant and the details of the complaint will be kept confidential and protected.

## 4.0 CODE VIOLATION

Disciplinary action will be taken in the event of non-compliance with this code. The specific disciplinary actions taken will be contingent on the nature and severity of the violation. Some of the possible actions for non-compliance with this code include:

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- Penalty or fine.
- Contract termination.
- Blacklisted or deregistered for a certain period for repeated non-compliance.

If any parties have questions or are unclear about matters related to this Code of Supplier Ethics or wish to report a suspicious act or incident of non-compliance with this code, the Concerned Party must cooperate with the TH PROP representative or the Integrity Officer of TH PROP.