



CODE OF ETHICS FOR BUSINESS CONDUCT



1. Background

Tomypak Holdings Berhad (“**Tomypak**”) is committed to conducting business with integrity, transparency, and respect for all stakeholders, including customers, suppliers, employees, shareholders, and the community. This Code of Ethics for Business Conduct (“**Code**”) sets forth the principles and standards of conduct that govern our business practices and behaviour. It is based on the guidelines provided by the Malaysian Code on Corporate Governance and other relevant laws and regulations.

2. Scope

This Code applies to all directors, employees, agents, and subsidiaries of Tomypak (collectively, “**Covered Parties**”). It covers all aspects of our business operations, including interactions with customers, suppliers, partners, competitors, and the community.

3. Guidelines

3.1 Compliance with Laws and Regulations

Tomypak is committed to complying with all applicable laws and regulations, including those related to business operations, taxation, employment, and environmental protection. We expect all Covered Parties to act in compliance with the law and to report any suspected violations immediately.

3.2 Fair and Honest Conduct

Tomypak promotes fair and honest business practices and maintains transparency in all its business dealings with stakeholders. We expect all Covered Parties to act with integrity and honesty in their business relationships, and to avoid conflicts of interest.

3.3 Conflicts of Interest

Tomypak identifies and manages conflicts of interest that may arise in its business operations, such as those involving employees, suppliers, or customers. We expect all Covered Parties to disclose any actual or potential conflicts of interest and to act in the best interests of the company.

3.4 Protection of Company Assets

Tomypak protects its assets and intellectual property and prevents misuse or misappropriation by employees or other parties. We expect all Covered Parties to use company assets and intellectual property responsibly and to report any suspected misuse or misappropriation immediately.



3.5 Workplace Diversity and Non-Discrimination

Tompak promotes diversity and inclusion in its workplace and ensures that all employees are treated fairly and without discrimination based on their race, religion, gender, or other personal characteristics. We expect all Covered Parties to respect and value diversity and to contribute to a positive and inclusive work environment.

3.6 Health and Safety

Tompak maintains a safe and healthy working environment for its employees, customers, suppliers, and other stakeholders and complies with all relevant health and safety regulations. We expect all Covered Parties to prioritize their own safety and the safety of others and to report any hazards or unsafe conditions immediately.

3.7 Environmental Sustainability

Tompak strives to minimise its impact on the environment by adopting sustainable business practices, such as reducing waste and emissions, and using renewable energy sources. We expect all Covered Parties to support and contribute to our environmental sustainability efforts.

3.8 Social Responsibility

Tompak contributes to the well-being of society by supporting social initiatives and charitable causes that align with its business values and objectives. We expect all Covered Parties to participate in and support our social responsibility efforts.

3.9 Ethical Business Relationships

Tompak maintains ethical business relationships with customers, suppliers and other stakeholders and avoids engaging in practices that may be deemed unethical or illegal. We expect all Covered Parties to act in a professional and ethical manner in all business relationships and to report any suspected violations of ethical standards or laws immediately.

3.10 Respect for Human Rights

Tompak is committed to upholding and respecting the principles of human rights as laid out in the United Nations Universal Declaration of Human Rights and other relevant international and national standards. Our respect for human rights is integrated into our business practices and guides our conduct with employees, customers, suppliers, and the communities we impact. We strive to prevent and mitigate adverse human rights impacts that are directly linked to our business operations, products, or services. All Covered Parties are expected to adhere to these principles and to conduct their activities in a manner that respects human rights.



4. Monitoring

Tomypak has established a system for monitoring and enforcing compliance with this Code. This includes regular audits, investigations of reported violations, and disciplinary actions for non-compliance. All Covered Parties are required to cooperate with these monitoring efforts and to report any suspected violations immediately.

4.1. Compliance Monitoring

Tomypak is committed to actively monitoring and ensuring compliance with this Code of Ethics for Business Conduct. Regular audits and assessments will be conducted to assess adherence to the principles and standards outlined in this Code. These monitoring activities aim to identify and address any instances of non-compliance promptly.

4.2. Reporting of Incidents

In addition to proactive monitoring, all Covered Parties are required to promptly report any suspected or actual incidents of non-compliance with this Code. This includes any violations of applicable laws, regulations, or internal policies. Incidents can be reported through established reporting channels, such as the company's whistleblower email, reporting mechanisms, or designated compliance officers.

4.3. Documentation and Analysis

Tomypak will maintain proper documentation of reported incidents, investigations, and their outcomes. The company will also analyse and track the number of claims or incidents of non-compliance to identify trends, areas for improvement, and opportunities for corrective actions. This information will be utilized to strengthen the company's compliance efforts and prevent future non-compliance.

4.4. Confidentiality and Non-Retaliation

Tomypak is committed to protecting the confidentiality of individuals reporting incidents of non-compliance, and it strictly prohibits any form of retaliation against those who make such reports in good faith. Any acts of retaliation will be treated as a separate violation of this Code and subject to appropriate disciplinary actions.

5. Review

This Code will be reviewed periodically to ensure its continued effectiveness and relevance to the changing business environment and legal landscape. Any updates or revisions will be communicated to all Covered Parties and stakeholders, and training programs will be conducted as necessary to ensure understanding and compliance.