



CODE OF CONDUCT

Delivering Service Professionally and Integrity Is Our Commitment

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FOREWORD

Our company brings together people from a wide range of cultural backgrounds – all with different skills and different viewpoints. The diversity of our workforce and our close relationships to customers, suppliers and numerous organizations around the world, are fundamental to our strength and success. An organization structured by various departments and branches in nationwide, we rely on a common understanding of what it means to act responsibly and with integrity.

Our Code of Conduct, established in 2015, defines clear ethical standards for Tele Dynamics Global Com Sdn. Bhd. and spans the entire spectrum of our daily work and operations. This spectrum includes quality management, customer relationships, workplace conduct, business integrity as well as corporate responsibility. The rules and guidelines defined by the Code of Conduct provide all of us with the necessary security and orientation in our day-to-day operations.

The Code of Conduct also communicates to our customers, investors and the public that Tele Dynamics Global Com Sdn. Bhd. is a reliable, trustworthy partner that combines first-class service with a strong sense of responsibility.

What is now clear is that, with this updated and expanded Code of Conduct, we have a success story that we can all be proud of. It has become an integral part of our corporate culture and binds us together across the business units and department across the company. We ask you to do your part to make sure we will stay on course. Only by maintaining our integrity and highest ethical standards at all times can we sustain our success over the long term.



OUR CODE OF CONDUCT

The Code of Conduct is binding for all business units and departments of Tele Dynamics Global Com Sdn. Bhd., and each of us can contribute to the success of our company by living the Code of Conduct

This Code describes the objectives and rules that reflect our commitment to responsible, ethically irreproachable and legally compliant behaviour.

The letter and spirit of this Code correspond to TDGC-wide rules and regulations that govern our business lives each day and form part of our corporate culture. Our employees are spokespersons of this culture.

1. WHAT IS CORRECT CONDUCT

Deutsche Post DHL Group constantly deals with a variety of people and organizations and representatives of diverse interests. Our image as a company depends on how employees conduct themselves in the business world.

There is no substitute for personal integrity and sound judgement. When faced with a difficult situation, consider these questions:

1.	Is my action or decision legal?
2.	Does it comply with the letter and spirit of this Code and other Company policies?
3.	Is it right and free of any personal conflicts of interest?
4.	Could my action or decision withstand public review? What would it look like in a newspaper?
5.	Will my action or decision protect the reputation of Tele Dynamics Global Com as a company with high ethical standards?

If the answer to each question is “yes”, the action or decision complies with the following principles of conduct and is most likely the correct one.

If you are not sure, ask. And keep asking until you are sure!

2. OUR ETHICAL COMMITMENT

Laws and Ethical Standards

Tele Dynamics Global Com strives for sustainable development of its business founded on economic performance and corporate responsibility. We honour the diverse interests of our customers, employees and business partners with integrity, fairness and honesty. We strive for excellence in both our business development and our ethical behaviour. We operate our business with integrity and comply with all laws applicable to our business in all regions and countries. We recognize that laws and ethical standards may vary from country to country according to national specifics.

Equal Employment Opportunity

Tele Dynamics Global Com provide equal opportunities, based on the suitability for the job, when recruiting, transferring and promoting employees. We do not employ child labour or forced labour in our organization. Sexual, physical or mental harassment of employees will not be tolerated.



3. OUR BUSINESS PRACTICES

Quality Focus

Our commitment to quality is core to our business. In order to achieve the highest quality standards, we work constantly to improve our structures and processes for the benefit of our customers. This applies not only to our products, services and management, but also to our behaviour.

Customer Satisfaction

We place the highest priority on making our customers successful, knowing that customer success guarantees our own success. Our activities are governed by our knowledge of the global and local requirements of our customers and markets. We include and prioritize the customer focus in our business processes, projects and dealings. We know that we will be measured by our ethical, social and environmental performance as much as by the quality of our service. We therefore strive for best practice in all these areas to secure customer trust.

Transparency

We are committed to openness in our dealings with our customers, shareholders, employees, suppliers, business partners and other organizations and institutions.

Transparency and honesty are the guiding principles in all our communication activities, internally and externally. The public have access to information, in line with internationally recognized standards of corporate governance

Business Partner Dialogue

We are committed to dialogue and partnership with our business partners throughout the world. We share principles of ethical behaviour, social engagement and respect for the environment with our suppliers, subcontractors, agents and consultants. We communicate our principles to our business partners and encourage them to adhere to the same standards we do.

4. OUR STANDARDS OF WORKING TOGETHER

Individual Responsible and Involvement

The skills and commitment of our employees are our greatest assets. We expect our employees to conduct their business in an entrepreneurial way and accept their individual responsibility. We endeavour to involve our colleagues in our projects and decision-making processes in order to achieve our common goals with reliability and commitment.

Mutual Respect and Openness

It is part of our corporate culture that all relations between board members, managers and employees of all levels, business units and departments shall be guided by mutual respect, openness, honesty and the spirit of trust and cooperation. We give and seek feedback and we communicate actively and openly with each other. We are committed to a fair and open debate and seek varying opinions. We encourage our colleagues to speak up promptly and to express their ideas and concerns. Team spirit is fostered by open-mindedness. We never encourage or direct our employees to achieve business results at the expense of compliance with the law, ethical standards or with this Code of Conduct. Tele Dynamics Global Com does not tolerate any kind of violence in the workplace, including but not limited to threatening and intimidating behaviour. Each employee is required to contribute to an environment of respect that precludes any kind of harassment, including workplace bullying, unwelcome sexual advances, unwanted physical contact, inappropriate propositions or a working environment tainted with harassing jokes, words or demeaning comments.

Diversity

We consider the diversity of our employees to be a real strength. We promote an inclusive work environment in order to attain the highest possible productivity, creativity and efficiency. The main criteria for employee selection and promotion are skills and qualification. We do not discriminate or tolerate discrimination with respect to gender, race, religion, age, disability, sexual orientation, national origin or any other characteristic protected under law.

Health and Safety at Work

We firmly believe that the well-being and safety of our employees are essential to our financial success. We are therefore committed to compliance with our health and safety policies. We strive to foster the physical and psychological well-being of our employees sustainably. Our goals are continuously efficient and committed employees, as well as fewer illnesses and a lower accident rate. We promote healthcare as a key element of our sustained productivity and the quality of our services. We establish shared values through our commitment to health and safety. Our health and safety policies, active in all locations throughout the world, include a ban on illegal drugs in the workplace.



Company Property

Each employee has a responsibility to safeguard and make proper use of Tele Dynamics Global Com property. The use of company property, including labour, supplies, equipment, buildings or other assets, for personal benefit is prohibited where not explicitly allowed by agreement. Intellectual property is a valuable asset and must be protected from unauthorized use or disclosure. Such property includes trade secrets, confidential information, copyrights, trademarks, logos, but also customer lists, business opportunities and product specifications, whether owned by Tele Dynamics Global Com or business partners.

Legal Proceedings

Employees must avoid activities that could involve or lead to the involvement of Tele Dynamics Global Com or its personnel in any unlawful practice, including the employment of our personnel or use of company assets for illegal gain. Lawsuits, legal proceedings and investigations concerning Tele Dynamics Global Com must be handled quickly and properly in order to protect and defend the company. Employees who are threatened by a lawsuit or other legal proceedings or investigation in a business-related matter are required to contact Tele Dynamics Global Com Human Resources Department immediately.

5. OUR BUSINESS INTEGRITY

Accounting and Reporting Standards

Tele Dynamics Global Com relies on the authenticity and accuracy of information recorded in its accounting records for proper decision making. It is of the utmost importance that records dealing with security and personnel, as well as accounting and financial data, are protected. All business transactions must be reflected accurately in our accounts in accordance with established procedures and auditing standards and generally accepted accounting principles. Accounting records will reflect and describe the nature of the underlying transactions.

Conflicts of Interest

We require all of our employees to maintain high ethical standards in handling conflicts of interest. They should disclose to a supervisor any relationship with persons or firms with whom Tele Dynamics Global Com does business, which might give rise to a conflict of interest. Such relations include a relationship by blood or marriage, partnership, business partnership or investment.

Fair Competition

We are committed to free enterprise and fair competition. Company business must be conducted solely on the basis of merit and open competition. We will hire suppliers, agents or other intermediaries only by careful and fair assessment. We are legally bound to make business decisions in the best interests of the company, independent of any understanding or agreement with a competitor. Tele Dynamics Global Com and its employees will avoid any conduct that violates antitrust laws.



Bribery and Corruption

Tele Dynamics Global Com adopts a zero-tolerance approach towards all forms of bribery and corruption in conducting its business. If any directors or staff are found to be involved in bribery or corruption activities, they will be subjected to disciplinary actions. Customer, supplier or business partner who breach the obligation will also have their business relationship terminated.

For further information, kindly refer to our company's Anti-Bribery and Anti-Corruption Policy.

Gifts and Benefits

Gifts and other benefits are permitted if they are usual business practice and ethical. None of our employees may solicit gifts or other personal benefits from customers, suppliers or other business partners. The giving and receiving of gifts and other benefits is prohibited in particular if they appear to influence upcoming business decisions or breach a law, regulation or policy.

For further information, kindly refer to our company's Anti-Bribery and Anti-Corruption Policy.

Money Laundering

Tele Dynamics Global Com requires all employees to strictly comply with all laws and regulations designed to combat money laundering activity. This includes those rules and regulations that state that currency transactions with blocked persons must be reported.

Trade Regulations

Tele Dynamics Global Com believes that free trade increases prosperity and affluence throughout the world. While always seeking to comply with applicable laws, including sanctions and embargoes, we exist in order to serve customers – wherever they may be.

Data Protection

Our employees shall not disclose information that is not known to the general public for personal gain or the benefit of anyone other than the company. Such information includes technical data, financial data, operating data, customer information, memoranda and other information regarding the company's business and operational activities and future plans. Employees shall adhere to relevant laws and company regulations with respect to personal data, especially that of customers, employees and shareholders. The collection, processing and use of personal data of natural and (where legally equivalent) legal persons must be in line with the applicable laws.

6. OUR CORPORATE RESPONSIBILITY

Our corporate responsibility is based upon our will to make a positive contribution to society. Tele Dynamics Global Com believe we have an impact on the communities in which we work and the world in which we live. We want to live up to our responsibility as a successful company and have therefore integrated corporate responsibility into our corporate strategy. We aim to act responsibly in all of our activities and apply our core competencies and the expertise of our employees to make our society a better place. We are in continuous dialogue with our stakeholders to take their views as citizens and consumers into consideration when we run our business.

7. INFORMATION AND REPORTING CHANNELS

Tele Dynamics Global Com communicates the ethical policy, to all levels of management and employees by conducting general awareness training programs and also through a circular displayed in the company's notice board or website. Employees and management are encouraged to ask question, voice concern and make appropriate suggestion reading the business practice of the company. Incidences of suspected violation of law, company rules and regulation, company policies, internal control procedures or breaches of trust must be reported promptly to the management. A Feedback Form system is in place for this purpose. The code of ethics and all business foundation policies are communicated to the public if required. Policies shall be displayed at our website www.tdgc.com.my to ensure that it is available to the public. The key suppliers, contractors and customers shall be informed of the related policies. External enquiry/complaint shall be channelled via <http://www.tdgc.com.my/operatingresponsibly/whistleblowing> and the management has to take proper action to resolve the complaint matter.