



# GROUP HUMAN RESOURCE

## Code of Conduct

<b>Prepared by</b>	: JASPER NG		
<b>Reviewed by</b>	: ESTHER KUAN		
<b>Approved by</b>	: BOARD OF DIRECTORS OF TROPICANA CORPORATION BERHAD		
<b>Revision No.</b>	: 1	<b>Issued Date</b>	: 9 JULY 2025

### 1.0 INTRODUCTION

This Code of Conduct outlines the expected standards of behavior for all employees of Tropicana Group.

### 2.0 OBJECTIVE

The objective of this policy is to foster a work environment that is respectful, fair, and aligned with the values of integrity, professionalism, and accountability.

### 3.0 SCOPE

This Code applies to all employees regardless of position or seniority. All individuals must adhere to the principles and expectations set forth in this Code.

### 4.0 Code of conduct and discipline:

#### 4.1 The Company **expects all employees** to:-

- 4.1.1 Support the policies, procedures and practices of the Company.
- 4.1.2 Discharge the responsibilities assigned to them by the Company or its' related Companies with full commitment and dedication and that they will promote and advance the interests of the Company at all times.
- 4.1.3 Give his/her undivided loyalty and devotion to the Company and not engage directly or indirectly in other forms of employment of other businesses even on a part time basis.
- 4.1.4 Seek the Management's prior permission for any shareholdings or directorship in other Companies outside the group.
- 4.1.5 Conduct themselves professionally at all times in order to reflect the good standing and reputation of the Company.
- 4.1.6 Keep in absolute confidence all Company information that they have acquired during their employment.
- 4.1.7 Serve with honesty, integrity, goodwill and courtesy
- 4.1.8 Display a high sense of cooperation and pro-activeness in carrying out his duties.
- 4.1.9 Generate efficient ways or approaches in the course of his/her work.
- 4.1.10 Not subordinate his/her duties to the Company in favour of his/her private interests.
- 4.1.11 Not conduct him/herself in any manner as likely to bring his/her private interests into conflict with his/her duties.
- 4.1.12 Not conduct him/herself in any manner as likely to cause a reasonable suspicion that:
  - i. He/She has allowed his/her private interests to come into conflict with his/her duties so as to impair his/her usefulness as an employee of the Company.
  - ii. He/she has used his position in the Company to his/her advantage.

- 4.1.13 Not conduct himself/herself in such a manner as likely to bring the Company into disrepute or bring discredit to the Company.
- 4.1.14 Not bring or attempt to bring any form of outside influence or pressure to support or advance a claim relating to the Company whether the claim is his/her individual claim, or that of other employees of the Company.
- 4.1.15 Not conduct himself/herself in such a manner as can be reasonably be constructed as lacking in efficiency.
- 4.1.16 Not conduct himself/herself in an irresponsible manner
- 4.1.17 Not conduct himself/herself in such a manner as may be construed as an act of insubordination.
- 4.1.18 An employee who is in breach of the above codes of conduct will render him/herself liable to disciplinary action.
- 4.1.19 Respect differences in culture, religion, and background and foster an inclusive workplace.
- 4.1.20 Not involve him/herself in harassment, bullying, and any form of abusive behavior, whether verbal, physical, or emotional.
- 4.1.21 Comply with all health and safety policies and report any hazards or unsafe conditions immediately.
- 4.1.22 Not misuse of company resources for personal gain. Company resources, including computers, software, equipment, and time, should be used exclusively for work-related purposes

### **5.0 Compliance to law, policies and procedure**

#### **5.1 An employee shall also strictly:**

- 5.1.1 Observe all statutory laws and regulations applicable to the Company's business.
- 5.1.2 Comply with the Company's established policies, guidelines, rules and procedures.

Stern disciplinary action will be taken against any employee for non-compliance of such laws, policies, rules and procedures.

### **6.0 Activities Outside Office**

- 6.1 Any employee having any interest either directly or indirectly through nominees or trustees in any Company, firms or business, **must** declare his/her interests to the Company.
- 6.2 Any permission granted may be withdrawn at any time without assigning any reason thereof.

### **7.0 Making Of Public Statements**

- 7.1 An employee **shall not either orally, in writing or in any other form** make or circulate any public statement on the policies or decisions of the Company- provided always that it shall not apply to a public statement made by an employee in relation to, or in connection with the performance of his/her duty.

- 7.2 *Except with the **permission of the Company**, an employee shall **not** orally, in writing, or in any other form, make any public statement or comment on any matter relating to the work of the department or organization in which he/she is or was employed, relating to any organization in which the Company has dealings with:*
- 7.2.1. Where such statement or comment may be reasonably be regarded as indicative of the policy of the Company, or
- 7.2.2. Where such statement or comment may embarrass or is likely to embarrass the Company.
- 7.2.3. Except with the consent of the Company, an employee shall not either orally or in writing, **discuss publicly** any measures taken by the Company or any official matters taken or carried out by the employee.
- 7.2.4. The words “public statement” or “discuss publicly” includes the making of any statement or comment to the press or the public or in the course of any lecture or speech or to the broadcasting thereof by sound or vision.

### 8.0 **Secrecy And Leakage Of Information**

- 8.1 An employee **shall not, either during or after his/her employment** hereunder, divulge or utilize any confidential information belonging to the Company, Affiliates, Subsidiaries, Clients and Associated parties (including confidential information as to formulae, process, and manufacturing methods, and confidential information as to the business and affairs of the Company) which may have come to his knowledge during his/her employment or under any previous contract of service with the Company and he/she shall, both during and after his employment hereunder, take all reasonable precautions to keep all such information set.
- 8.2 Except so far as may be necessary for the purpose of his/her duties hereunder, an employee shall not, without the consent of the Company **retain or make originals or copies** of letters, reports, drawings, calculations, specifications, formulae, forms, licenses, agreements, or other documents of whatever nature belonging to the Company or notices thereof, nor retain samples of specimens in which have come into his possession by reason of his employment hereunder.
- 8.3 If on termination of his employment hereunder, an employee is in possession of any originals or copies of letters, reports, drawings, calculations, specifications, formulae, forms, licenses, agreements, or other documents of whatever nature belonging to the Company, or any notices thereof or any such samples or specimens as aforesaid, **he/she shall deliver the same to the Company without being asked**, except so far as consent to retain them has been given by the Company. Any such consent shall not of itself relieve the employee from his/her obligations under **Clause 8.1** as above.
- 8.4 **Non-Disclosure Agreement (NDA)**  
All employees must sign a NDA while working in the Company which contains the following gist: -
- 8.4.1 **Part I: Confidential Information**
- Proprietary right
  - Non-disclosure
  - Return or destruction of Confidential Information

### 8.4.2 Part II: General Provisions

- Consequences of Breach
- Continuing obligations
- Severability
- Governing law

(Refer to the attached ***Employee Confidentiality Agreement*** under Appendices, enclosed at the back of this Employee Handbook).

## 9.0 Liability Of Employees

An employee may be liable to an extent to be determined by the Company for any Company facilities given or any other action taken by him without the approval of the Company. Any payment that has to be made by the Company as a result of the employee's negligence or careless action or as a result of action taken without approval, shall be **recoverable from the employee by way of deduction from his/her salary** or the Company at its' discretion may take any other action against such an employee.

## 10.0 Marriage Between Employees

- 10.1 The Company does not encourage marriage between employees within the same department / company. Should there be such cases, either one party will be required to be transferred out of the department / company, to another job function, location or company or resign from the service of the Company. The Management shall decide on the transfer, if necessary, on a case to case basis.
- 10.2 It is the obligation of the employee to inform his/ her Head of Department and the GHRD on the change in their marital status, especially if the spouse is also an employee of the Company.

11.0 TROPICANA GROUP reserves the right to amend this policy from time to time.

12.0 Please refer to Head of Department, Group Human Resource should there be any queries.