

Tatawa Industries (M) Sdn. Bhd. – Business Ethics Policy Statement

商业道德政策声明

General Principles 基本原则

Tatawa Industries (M) Sdn. Bhd. expects and demands that each of its business departments, all of its employees, and its Directors carry out their business and perform their duties to the highest ethical standards and in compliance with all relevant legal principles. This standard of behaviour and performance is maintained in the company's dealings with employees, customers, suppliers, and all other stakeholders.

Tatawa Industries (M) 私人有限公司期盼和要求每个部门，所有员工及其董事，每个人都做出合乎最高道德标准的商业决策和履行各自的职责，并且遵循所有相关的法律原则的要求。我们在诚信方面的承诺延伸到我们的所有业务关系以及与政府官员的所有交往。

Conflicts of Interest 利益冲突

Tatawa's management and staffs shall have an obligation to act in the best interest of our company at all times.
The company will take all reasonable care to avoid conflicts of interest.

Conflicts of interest may arise when:

- Engage in activities that compete with, or appear to compete with, our company's interests
- Let your business decisions be influenced, or appear to be influenced, by personal or family interests or friendships
- Use company property, information or resources for personal benefit or the benefit of others
- Hire, supervise or have a direct or indirect line of reporting to a family member or someone with whom you have a romantic relationship
- Have outside employment that negatively affects your job performance or interferes with your Tatawa responsibilities
- Work for, provide services to, have a financial interest in or receive any personal benefit from a supplier, customer, competitor or a company that does or seeks to do business with Tatawa if such relationship or interest could influence, or appear to influence, your business decisions.

Tatawa的管理层和员工都有义务始终以维护本公司最佳利益的方式行事。

应该避免个人利益与公司的利益发生冲突或存在冲突的迹象

当进行下述活动时，可能会产生利益冲突：

- 从事与本公司利益存在竞争关系或看似存在竞争关系的活动
- 让您的商业决策受到或看似受到个人或家庭利益或友谊的影响
- 为了个人利益或他人利益，使用公司财产、信息或资源
- 雇佣、监督家人或与您有恋爱关系的人，或者直接或间接向其报告
- 接受对您的工作绩效产生负面影响或妨碍您在 Tatawa 的职责的外部雇佣
- 为供应商、客户、竞争对手或与 Tatawa 存在业务往来或希望与 Tatawa 开展业务的公司工作、向其提供服务、拥有这些公司的财务权益或能够从其获得任何个人利益，且此类关系或权益可能会影响或看起来会影响您的业务决策。

Business Gifts and Entertainment 商业礼物和商业款待

Employees are prohibited from providing, offering, or receiving any gift that serves to, or appears to, inappropriately influence business decisions or gain an unfair advantage.

公司禁止员工提供，赠送或接受礼物，如果任何礼物旨在或看似会影响公司的商业决策或者获得不公平的优势。

However, under certain circumstances you may exchange business gifts that are intended to generate goodwill, provided:

但是在某些情况下，可以交换旨在建立商誉的商业礼物

- The gift is not cash or a cash equivalent, not excessive in value.
- 礼物不是现金或现金等价物
- The gift is permitted under the laws that apply to the recipient and the recipient of the gift is authorized and permitted to accept the gift
- 礼物根据适用于接收者的法律获得许可，而且礼物的接收者获得接受礼物的授权及许可

“Business gifts” do not include company-sponsored sales contests or incentive programs.

In addition, business hospitality, including meals and entertainment, is not prohibited as long as the nature and frequency of the occasion is reasonable, the occasion involves the active conduct of company business and the business hospitality otherwise complies with our policies.

“商业礼物”不包括公司赞助的销售竞赛或奖励计划。此外，只要场合的性质及招待频率合理，在该场合中积极开展公司业务，且商业款待包括用餐和招待) 遵循我们的政策，就不会禁止商业款待。

Accurate Business Record 准确的业务记录

Maintain accurate financial books and business records in accordance with all applicable legal and regulatory requirements and accepted accounting practices.

公司账簿和记录准确性必须始终准确无误，并且符合法律的规定。

Anti-Money Laundering 反洗钱

Tatawa complies with all laws that prohibit money laundering or financing for illegal illegitimate purposes. "Money laundering," is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate.

Tatawa 遵循所有禁止洗钱或以非法或不正当目的进行融资的法律。"洗钱"是个人或集体试图隐瞒非法活动的得益，或试图把非法资金来源合法化的过程。

Anti-Corruption 反腐败

Corrupt arrangements with customers, suppliers, government officials, or other third parties are strictly prohibited in Tatawa. "Corruption" generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means.

Corruption may involve payments or the exchange of anything of value and includes the following activities:

- Bribery (bribery of a government official or commercial bribery)
- Extortion
- Kickbacks

WHAT IS A "KICKBACK"?

A kickback is a form of corruption that involves two parties agreeing that a portion of sales or profits will be improperly given, rebated or kicked back to the purchaser in exchange for making the deal. For example, a kickback might involve a supplier who offers a Tatawa associate a monthly payment equaling 3% of Tatawa's purchases as an inducement to the associate to retain the supplier's services. Kickbacks, like other forms of corruption, are unethical and prohibited under our Code, policies and the law.

严禁与客户、供应商、政府官员或其他第三方达成腐败的安排。"腐败"通常指运用不当或非法方式获得、企图获得个人利益或业务优势。腐败可能涉及到付款或换取任何有价值物，包括以下活动：

- 贿赂（贿赂政府官员或商业贿赂）
- 敲诈
- 回扣

什么是"回扣"？回扣是一种腐败形式，它是买卖双方同意不适当地给予、退还或返还一部分销售额或利润给买方，以达成交易的做法。例如，供应商每月向 Tatawa 联系人支付相当于 3% Tatawa 采购额的款项，诱使该联系人维持该供应商的服务的做法，可能涉及回扣。回扣与其他形式的腐败一样，都不符合道德，是为我们的《准则》、政策和法律所禁止的。

Environment 环境

The company respects the environment and the need to protect it and minimise the impact its operations have on it.

Carry out operations with care for the environment and comply with all applicable environmental laws and regulations.

The potential environmental impacts of daily business decision-making processes should be considered along with opportunities for conservation of natural resources, recycling, source reduction and pollution control to ensure cleaner air and water and to reduce landfill wastes

我们公司重视环境和保护环境的需要，尽量在日常的公司运作上降低对环境造成的负面影响。

我们在日常公司的运作上提倡关心环境以及遵循所有环境相关的法律原则的要求。

当我们在做出商业考量的当儿，应该考虑是否在过程中可以保护天然资源，循环使用，削减资源和控制污染，以确保拥有更清洁的空气和水源和减少填埋废弃物

Report suspected violations of the Code 举报

Employees are encouraged to report suspected violation of the code of business ethics policy to the HOD of respective department or HOD of Human Resources department (Internal extension line: 100).

鼓励员工使用举报热线举报（各部门的经理或者人事部经理的热线：100）

- 犯罪行为及违反法律的行为
- 偷盗或欺诈
- 安全和环境危害
- 产品质量问题
- 歧视及骚扰
- 工作场所暴力
- 利益冲突



Yee Hui, Ng
Executive Director

(- 1 - 2025

Date