



Tradewinds
P l a n t a t i o n B e r h a d

SUPPLYING VALUE THE RIGHT WAY

BUSINESS PARTNER CODE OF CONDUCT



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For Tradewinds Plantation Berhad

1. INTRODUCTION

- 1.1 Tradewinds Plantation Berhad (TPB) values the commitment by its business partners to uphold the spirit of integrity as the central and fundamental foundation in all our business relationships.
- 1.2 This Business Partner Code of Conduct (“this code”) stipulates the key principles which governs TPB’s business relationships. These principles are the minimum standards that TPB expects all its business partners to respect and adhere to when conducting business with TPB.
- 1.3 TPB appreciates that there will be specific business practice situations which may require further clarification, and in such instances, business partners are encouraged to contact their counterparts in TPB, who will in turn seek guidance internally.
- 1.4 To facilitate the Raising Concerns process, this Code outlines a secured communication channel which is available for business partners to report any action or behaviour deemed in violation with the principles of this Code.

2. OBSERVING THIS CODE

- 2.1 Obligation to comply with this Code is a pre-requisite in all our business relationships. Business partners are responsible for ensuring adherence as well as self-monitoring their compliance with the principles of this Code.
- 2.2 In order not to give rise to undesirable perceptions, business partners must also endeavour to avoid practices that give the appearance of violating the principles of this Code.
- 2.3 In instance where TPB is required to perform compliance checks or undertake investigations, business partners are expected to cooperate fully with authorised representatives from TPB.

3. THE 6C PRINCIPLES OF THIS CODE

3.1 PRINCIPLE I : CORRUPT-FREE BEHAVIOUR AND ACTIONS

- 3.1.1 Business partners must never, either directly or indirectly such as through third parties purporting to represent TPB, engage in **bribery, embezzlement, offering kickbacks, extortion or blackmail** to obtain and unfair or improper advantage.
- 3.1.2 TPB recognizes the exchange of modest promotional items and hospitality as acceptable business practice, where this should be in line with the giver's and receiver's policies on such practices, **never be intended to exert undue influence** on any business decision and undertaken in an open manner during the course of business.

3.2 PRINCIPLE II : AVOIDING CONFLICTS OF INTEREST

- 3.2.1 Business partners should **avoid any actual or potential conflict** of interest and are expected to promptly **disclose and manage** such situation so as to promote objectivity and independence when making any business decision.

3.3 PRINCIPLE III : CAPABILITIES

- 3.3.1 Business partners must earnestly provide an **honest disclosure of their knowledge, expertise, experiences and qualifications**.
- 3.3.2 TPB also expects business partners to submit **genuine and impartial references** on their previous engagements and work done.

3.4 PRINCIPLE IV : COMMITMENT

- 3.4.1 When providing a quotation or participating in a tender, business partners must do so with **firm commitment to proceed with the contract**.
- 3.4.2 TPB expects business partners to take **full responsibility and accountability** in honouring all aspects of their commitments, whether embodied in writing or otherwise.
- 3.4.3 TPB encourages its business partners **to strive for continuous improvement and to apply best practices** in order to enhance the delivery of products, services and works to TPB.

3.5 PRINCIPLE V : COMPLIANCE

- 3.5.1 TPB expects its business partners to comply and to act in accordance with **all applicable laws and regulations**.
- 3.5.2 It is also necessary for business partners to **keep abreast of developments and changes in the relevant laws and regulations** to ensure continuous compliance.

3.6 PRINCIPLE VI : COMPETITIVE

- 3.6.1. Business partners **should not conspire or collude** with other parties when submitting quotations and participating in a tender.
- 3.6.2 TPB expects business partners to provide **commensurate price that reflects the true value** of their products, services and works.

4. RAISING CONCERNS

- 4.1 Concerns on violations of the principles of this Code can be made in confidence via email to ceo@tpb.com.my
- 4.2 A business partner should raise a concern in good faith and with a reasonable basis by :
 - Identifying himself or herself; and
 - Providing fair information describing the situation and where possible, evidence to support such concern.
- 4.3 TPB will keep confidential all concerns raised and actions thereof to protect the integrity of the process and the confidentiality of all parties involved.
- 4.4 TPB does not tolerate any form of retaliation and retribution as a result of raising a legitimate concern.

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This code is subject to change and will be revised as and when required.

This code is available in English and Bahasa Malaysia. In the event of any conflict between the English and Bahasa Malaysia versions, the English version shall prevail.

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