

1.0 OBJECTIVE

This Code aims to:

- i. Communicate and guide Directors and Employees on the ethical behaviours and values expected from the Group;
- ii. Facilitate measurement and monitoring of management performance against these values;
- iii. This Corporate Code of Ethics and Conduct is not intended to be exhaustive, and there may be additional obligations that Directors and Employees are expected to adhere to and comply with when performing their duties; and
- iv. For all intents and purposes, all Directors and Employees shall always observe and ensure compliance with all applicable laws, rules and regulations to which they are bound to observe in the performance of their duties.

2.0 APPLICABILITY

This Corporate Code of Ethics and Conduct is applicable to all Directors and Employees of the Company.

Each Employee has a duty to read and understand this Corporate Code of Ethics and Conduct. Violation of any of the provisions contained herein may result in disciplinary action, including termination of employment and where relevant, reporting to the police or other relevant enforcement agencies.

For further clarification or questions on this Corporate Code of Ethics and Conduct, please contact the following personnel:

Ms. Jennie Tan Yen-Li (Compliance Manager/Executive Director)

- Telephone: +604-645 6294
- Fax: +604-645 6295
- Email: jennietan@ttvision-tech.com
- Address: Plot 106, Hilir Sungai Keluang 5, Bayan Lepas FIZ 4, 11900 Bayan Lepas, Pulau Pinang.

3.0 OUR VALUES

At TT Vision Holdings Berhad (“Company”) and its subsidiary companies (“Group”), we:

- a) Ensure that our products and services are produced and delivered ethically and lawfully, and the information provided in our promotions and advertisements are factually accurate;
- b) Uphold sound business ethics and comply with laws in conducting our business;
- c) Create a safe, healthy and secured workplace free from any form of danger, discrimination and sexual harassment. Merit and performance shall be duly recognized and be rewarded with fair remuneration and career advancement opportunity;
- d) Embrace social equity and diversity, and support good causes and charities;
- e) Protect the environment and natural resources and ensure their sustainability;
- f) Ensure availability for legitimate business purposes and that no property, information or position belonging to the Company or opportunity arising from these be used for personal gain;
- g) Ensure accurate, timely and reliable records to meet the Company’s legal and financial obligations and to manage the affairs of the Company. All books, records and accounts should conform to generally accepted and applicable accounting principles and to all applicable laws and regulations. The preparation and maintenance of accurate and adequate business records are the responsibility of each Employee. No unauthorised, false, improper or misleading records or entries shall be made in the books and records of the Company, under any circumstances;
- h) Comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions within which the Company operates. Directors and Employees are expected to understand and comply with the laws, rules and regulations that are applicable to their positions and/or work, including the Malaysian Anti-Corruption Commission Act 2009, Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001, Personal Data Protection Act 2010 and Competition Act 2010. The Company reserves the right to report any actions or activities suspected of being criminal in nature to the police or other relevant authorities; and
- i) Treat fellow Employees fairly and courteously without regard to race, creed, religion, gender, nationality, age or disability.

4.0 OUR INTOLERANCE

We do not tolerate insider trading, money laundering, corruption, conflicts of interest transactions and abuse of power. No Directors, officers, and employees shall:

- a) Enter into any transaction in the securities while they possess non-public information about that Company or recommend others to transact in the securities of the Company based on insider information;
- b) Assist money laundering activities which may include, but are not limited to accepting an unusual amount of payment in cash, or payments made by or to third parties who are not parties to the contract; or payments made in currencies that differ from invoices;
- c) Solicit gifts or favours in connection with their official duties; or accepting gifts which would create or give rise to the perception of impropriety or biases that would damage the reputation of the Group;
- d) Provide gifts, bribes or benefits to influence other stakeholders to obtain or retain business or secure an unfair advantage in any business transaction or any such offences as stipulated in the Company's Anti Bribery and Corruption Policy;
- e) Take part in deciding any transaction, contract or proposed contract or arrangement in which they are interested, directly or indirectly;
- f) Engage in an outside interest that will undermine the performance of the Directors and Employees or bring disrepute to the Company;
- g) Use the power conferred to their position by imposing their will over a subordinate, for gaining benefits or for a particular objective that is usually in violation of laws, rules and regulations;
- h) Create any form of discrimination or prejudice in the workplace; and
- i) Involved in or abet any activity that is deemed by the Company to be an act of misconduct (includes use and abuse of drugs).

5.0 BOARD'S RESPONSIBILITY

To uphold this Code, the Board shall ensure that:

- a) Adequate procedures and framework are implemented to support, promote and strengthen the awareness of and compliance with this Code;
- b) A confidential whistleblowing communication channel is provided for stakeholders to report irregularities;
- c) The values of the Code are integrated into the Board and management decision-making process;

- d) Management performance evaluation is assessed against the provisions of this Code; and
- e) Appropriate disciplinary action is taken against wrongdoers who have violated this Code.

6.0 MANAGEMENT'S RESPONSIBILITY

Management should make this Code readily available and communicate it to all employees, and publish it on the Company's website.

In making operational and business decisions, Management is responsible to the Board to observing this Code's provisions. Management shall ensure their action is consistent with the spirit of this Code and promote sound ethics in their interaction with all stakeholders.

7.0 DOCUMENTATION

This Code shall be embedded in the Employee Handbook. All employees must read and familiarise themselves with this Code and acknowledge their understanding and compliance with the Code annually during their employment with the Group.

8.0 REPORTING OF VIOLATIONS

According to the Group's whistleblowing procedures which are embedded in the Anti-Bribery & Anti-Corruption policy, stakeholders who know of or suspect any violation of this Code are strongly encouraged to report the incidence to:

- A. Ms. Jennie Tan Yen-Li (Compliance Manager/Executive Director)
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