

NO GIFT POLICY

Thong Guan Industries Berhad (Thong Guan) aims to achieve the highest level of trust, transparency and trustworthiness in our business operations. Therefore, we have adopted a “No Gift Policy” throughout our business operations and at all levels of our management and employees.

Our “No Gift Policy” states that Thong Guan’s directors and employees, their family members or agents acting for or on behalf of Thong Guan employees, directors or their family members are prohibited from, directly or indirectly, receiving or providing gifts or favors from or to our business partners in any situation and at any time.

The objective of this policy is aim to avoid any conflict of interest or the appearance of conflicts of interest in our business dealings. It is important for ALL employees and stakeholders to familiarize themselves with the stated provisions above in order to avoid any misunderstandings/ issues arising due to such dealings.

- a. All employees should both be and appear to be free of any interest (financial or otherwise) which might be regarded as being in conflict or incompatible with their integrity and objectivity.
- b. All employees should recognize and avoid any situations which may affect their integrity and objectivity by being cautious of undue benefits or preferential treatment received in the course of carrying out their duties.
- c. By default, all employees are prohibited from accept any gift and/or favour of whatever kind from any vendors, customers, business associates of the Company or any prospective vendors, customers or business associates of the Company.
- d. Employees are prohibited, in connection with their official duties, solicit for private purposes any benefits, or accept any benefits which could or could not create a conflict of interest or be seen to create such conflict.
- e. Employees cannot request from any vendors, customers, business associates of the Company for any kind of sponsorship either in goods or in kind for personal or company's functions unless and except prior approval was obtained for the specific occasion.
- f. Employees must not give or receive a gift or benefit that may, or may be perceived to compromise his or her judgment, damage relationships with other persons or organizations, or indicate favouritism towards a person or a group of people.
- g. Monetary gifts must not be accepted under any circumstances.

DECLINING OFFERS

Employees are required to professionally inform vendors, potential vendors and others of this no-gift policy, and the reasons the company has adopted the policy. Employees will request that vendors respect our company policy and not purchase and deliver any gift *for our* employees, a department, an office, employee’s residence or the company, at any time, for any reason.

PENALTIES

Any violation of this No Gift Policy may result in disciplinary action, including but not limited to, termination of employment.

AUTHORITY LEVELS

If an employee has any doubts or is seeking clarification of this No Gift Policy, the employee should check with his/her superior. If the superior is uncertain, Director Office should be referred to ensure consistent treatment across TG.

EXCEPTION

Any other exceptions to the No Gift Policy may be made only with the permission of Managing Director of TG.