TH PLANTATIONS BERHAD
197201001069 (12696-M)

Our reference: THP/IGU/2025/SCOE

21st August 2025

All Valued Supplier

Dear Sir/Madam,

ACKNOWLEDGMENT AND COMPLIANCE WITH THP SUPPLIER CODE OF ETHICS

We trust this letter finds you well.

2. As part of TH Plantations Berhad's ("THP") commitment to upholding ethical business practices, we kindly request all our valued suppliers to acknowledge and comply with the THP Supplier Code of Ethics ("Code"). Adherence to this Code is an essential requirement for all individuals and entities conducting business with TH Plantations Berhad, including but not limited to sub-suppliers.

3. Enclosed with this letter, please find the following documents for your reference:

- Appendix 1 – THP Supplier Code of Ethics
- Appendix 2 – Acknowledgement of Compliance with the Supplier Code of Ethics of THP

4. We kindly request you to review the Supplier Code of Ethics and sign the Acknowledgement of Compliance (Appendix 2) as confirmation of your full adherence to the policies outlined. Kindly ensure that the signed document, with your company stamp affixed, is returned to us at your earliest convenience.

5. We appreciate your cooperation in this matter, as compliance with this requirement is crucial to maintaining a responsible and ethical business partnership. Should you have any questions or require further clarification, please do not hesitate to contact us.

We sincerely appreciate your prompt attention and cooperation in ensuring compliance with our ethical standards.

Best regards,

MEGAT RIZAL EZZUDIN B. ABD. MAULUD
Head, Procurement

TH PLANTATIONS BERHAD
197201001069 (12696-M)
Tingkat 23, Menara *TH* Selborn
153, Jalan Tun Razak, 50400 Kuala Lumpur
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APPENDIX 1

TH PLANTATIONS BERHAD
Registration No. 197201001069 (12696-M)

THP Supplier Code of Ethics

Serial No.: Version 01

Approval date: 21 January 2025

by

Integrity & Governance Unit

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1. DEFINITION

Term	Meaning
THP	TH Plantations Berhad and its subsidiary companies in Malaysia and Indonesia.
Supplier(s) shall refer to	(i) All suppliers registered under Procurement Department as THP authorized supplier list. (ii) THP potential suppliers that participate in the bid, consultants and any third parties acting for and on behalf of the THP supplier and potential suppliers. (iii) A person or entity, where THP will potentially engage or has engaged with or entered into a commercial arrangement vide business dealings to collaborate with such person or to form an alliance through a letter, contract/agreement or memorandum of understanding. (iv) Bidders, contractors, consultants, or service providers.

2. INTRODUCTION

2.1. This Supplier Code of Ethics ("Code") outlines the principles and expected behavior from every supplier, their employees, subcontractors and sub-suppliers of TH Plantations Berhad ("THP") in providing goods and services to THP.

2.2. To ensure compliance with this Code, suppliers must ensure that the Code is shared with all individuals assigned to perform work for or on behalf of THP and that all tasks related to THP are carried out by individuals with the necessary skills, expertise and certifications to uphold the principles and meet the standards set out in the Code.

2.3. The principles of the Code align with THP's vision and mission to maintain high standards in corporate governance, enhancing accountability, transparency, integrity and sustainability in THP's procurement process to reduce and eradicate corruption.

3. PRINCIPLES OF THE CODE

THP expects suppliers to conduct business according to high ethical standards, including adherence to the following principles:

3.1 Honesty in fulfilling responsibilities

All suppliers and their representatives must conduct business transactions and activities with honesty, trustworthiness, responsibility and integrity.

In addition, all suppliers and their representatives must:

- Record and report all business information accurately and truthfully.
- Protect and take responsibility for THP's physical and intellectual assets, including property, supplies and equipment, when authorized by THP to use these assets.
- Ensure all records, communications, and disclosures related to THP are made fully, fairly, accurately, timely and understandably.

3.2 Compliance with laws

All THP suppliers and their representatives must adopt and comply with all THP regulations, as well as any amendments made from time to time during the course of their business activities.

In addition, all suppliers and their representatives must:

- Comply with the terms and conditions agreed upon in the contract.
- Comply with all civil and/or criminal laws of the country.
- Adhere to anti-corruption and bribery laws, including the Malaysian Anti-Corruption Act 2009 (MACCA) [Act 694].
- Comply with all environmental laws and regulations related to hazardous materials, air emissions, waste and pollution.

3.3 Avoiding corruption

No supplier, either directly or indirectly, shall request, offer, receive, give, or promise any reward in the form of money, goods, or services to any THP personnel in exchange for decisions, opinions, votes or any other actions that influence procurement decisions.

In addition, all suppliers and their representatives must:

- Not conspire in any activities related to corruption.
- Immediately report to THP management if there are any acts or attempts of corruption by THP personnel or other suppliers.

3.4 Avoiding conflicts of interest

All THP suppliers and their representatives must avoid engaging in activities that may lead to conflicts of interest in procurement matters.

For example, suppliers having family relationships or business partnerships with shareholders, tender committee members or other THP personnel.

Suppliers who have, or potentially have, a conflict of interest with any THP personnel must immediately inform THP management, whether before or after their appointment and selection. THP management reserves the right to decide whether the supplier should withdraw or continue the engagement.

While involved in work related to THP, suppliers must not accept any job or engage in any activity that could create or lead to a conflict of interest.

3.5 Gifts

Suppliers or their representatives must not offer or give any gifts, either directly or indirectly, to THP personnel involved in the bidding or tender process, or to any THP personnel or their family members that could influence their judgment in performing their duties.

3.6 Responsibility for confidential information and THP assets

a. Confidential information

Suppliers must maintain and protect the confidentiality, integrity and information entrusted to them by THP, unless the disclosure is permitted by THP or required by law and the courts.

Confidential information refers to proprietary THP information or third-party information used by THP, where unauthorized disclosure or modification could lead to financial loss, damage to THP's reputation and affect its performance.

b. THP assets

All THP suppliers and their representatives must respect THP's intellectual property rights, including but not limited to copyrights, patents, trademarks and trade secrets.

Information technology and systems provided by THP may only be used for business purposes related to THP.

Suppliers and their representatives are prohibited from using the technology and systems provided by THP to create, access, store, print, request or send any materials that are disruptive, threatening, abusive, obscene or to send any false, insulting or malicious communication.

3.7 Importance of quality standards and skills

All THP suppliers and their representatives must continuously uphold and improve high standards of ethics and work quality when completing transactions.

In addition, all suppliers and their representatives must:

- Obtain the necessary licenses/permits required as suppliers of goods or services for THP.
- Provide a highly skilled, adequate and quality workforce to complete transactions.
- Use and supply equipment that meets the specified quality standards for carrying out assigned activities.

3.8 Avoiding anti-competitive practices

All suppliers of THP and their representatives must engage in healthy and transparent competition in procurement transactions, such as not providing false or misleading information to other suppliers, concealing or destroying documents.

In addition, all suppliers are prohibited from participating in any agreements among suppliers, customers or bidders in procurement matters.

3.9 Respect for individuals and communities

a. All suppliers must prioritize a sense of respect towards all parties involved in a contract, including respecting the values, history, religion, beliefs and culture of the community throughout the duration of the contract.

b. All suppliers must avoid practicing discrimination in any form based on race, age, gender, state and country of origin, ability or sexual orientation during the execution of the contract.

c. All suppliers must ensure that each of their employees is provided with a satisfactory working environment, treated fairly, compensated with appropriate rewards and supported in terms of career development and welfare appropriately.

4. COMPLIANCE WITH THE CODE

Compliance with the principles, policies, and regulations stated in this Code is mandatory for all suppliers and their representatives dealing with THP. Therefore, suppliers must:

a. Read and understand this Code;

b. Immediately report any non-compliance or violations of this Code by any party to the appointed management of THP;

c. Fully cooperate with any investigations conducted; and

d. Ensure and educate staff or supplier representatives or subcontractors that they understand and comply with this Code.

5. VIOLATION OF THE CODE

Disciplinary action will be taken in the event of non-compliance with this Code.

The disciplinary measures imposed will depend on the type and severity of the violation committed.

Actions that may be taken for non-compliance with this Code include:

a. Suspension and/or removal of THP Supplier registration and shall be blacklisted for future registration;
b. Revocation of any award and/or contract offer;
c. Termination of any existing award and/or contract; and
d. Any other disciplinary actions according to THP procurement rules and regulations in force.

6. REPORTING OF POTENTIAL BREACH

THP is committed to providing the highest standards of integrity, ethics, accountability, and legal conduct. THP pledges to uphold Malaysia's Anti-Corruption principles by promoting the highest standards of transparency and integrity, and by abiding by all laws and regulations in all aspects of THP's operations.

a. Suppliers shall raise concern if there's any potential misconduct of business activities between THP, supplier or any third party through our whistleblowing channel via:

- Telephone hotline: 03-2616 7115; (Available during office hours, i.e. 9.00 am to 6.00 pm Monday to Friday, excluding public holidays in Kuala Lumpur)

- Email hotline: whistleblowing_thp@bdo.my; or

- Web portal: TH Plantations Ethics Line.

7. REFERENCE

7.1. THP Code of Ethics and Conduct.

7.2. Kod Etika Pembekal Tabung Haji.

7.3. Guidelines on Adequate Procedures.

7.4. Peraturan Pembelian, Tender dan Kontrak 2019.

7.5. THP Whistleblowing Policy.

7.6. The Malaysian Anti-Corruption Commission Act 2009 (MACCA) [Act 694].

7.7. Malaysian Standard (MS ISO 37001:2016) – Anti-Bribery Management Systems.

8. OWNERSHIP

8.1. Head of Integrity and Governance

9. VALIDITY

9.1. This Policy will be updated, amended or revised from time to time to ensure its adequacy in implementation and enforcements.

9.2. In the event of any inconsistency or conflict between the English and Malay versions of this Policy, the English version shall prevail.

APPENDIX 2

TH PLANTATIONS BERHAD
Registration No. 197201001069 (12696-M)

ACKNOWLEDGEMENT OF COMPLIANCE WITH THE SUPPLIER CODE OF ETHICS OF TH PLANTATIONS BERHAD

I/We hereby confirm that I/we have read and understood the Supplier Code of Ethics of TH Plantations Berhad, and I/we acknowledge that this Supplier Code of Ethics applies to all individuals or entities conducting business transactions with TH Plantations Berhad, including but not limited to Sub-Suppliers acting on my/our behalf.

I/We hereby agree to fully comply with all provisions of this Supplier Code of Ethics of TH Plantations Berhad and understand my/our responsibility to promptly report any known or potential violations of this Supplier Code of Ethics to TH Plantations Berhad.

I/We also confirm that I/we understand that any violation of any provision of this Supplier Code of Ethics may result in TH Plantations Berhad taking action in accordance with the law or as agreed upon by both parties in any contract, including but not limited to declaring the Supplier as irresponsible, in breach of contract, or being barred from continuing any supply dealings.

Company Stamp	**Supplier's Signature**
Supplier's Name:	