



CODE OF CONDUCT & ETHICS

	DOC NO.	TSB-COC
	REV.	
Code of Conduct & Ethics	EFFECTIVE DATE	

1.0 INTRODUCTION

- 1.1 This Code of Conduct and Ethics (“Code”) applies to all employees and directors of Triterra Metropolis Sdn Bhd and its subsidiaries’ (“Triterra”) including full-time or permanent employees, part-time employees, employees on probation, trainees and interns, employees on secondment and personnel on fixed-term contracts (collectively, “Employees”).
- 1.2 This Code sets out the principles to guide standards of behaviour and business conduct when Employees deal with third party. In this context, third party refers to any individual or organisation the Employee comes into contact with during the course of his/her work, and includes actual and potential customers, competitors, suppliers, contractors, distributors, business contacts/partners, agents, advisers, regulators, government and public bodies and officials, shareholders, investors and the community (collectively “Stakeholders”) in which the Triterra operates in.
- 1.3 The specific procedures on the application of the policies referred to in the Code will be spelled out in the Company's policies and procedures documents.
- 1.4 This Board of Directors has approved this Code. Updates or amendments to this Code may be made from time to time to be in line with any change in applicable laws and regulations, or changes to the Company’s vision and mission or other relevant factors. Employees will be informed of any update or amendment to the Code.

2.0 EMPLOYEES’ RESPONSIBILITIES

- 2.1 Each employee of Triterra is expected to be familiar with, understand and comply with the Code. Where the employee has doubts on the application of the Code, it shall be the employees’ responsibilities to seek clarification from Department HOD, the Company’s Human Resource Department and the Integrity Committee.
- 2.2 The employee must understand the underlying principles within this Code. These principles form the basis of the conduct towards their Stakeholders. The principles basis are:
- I. Integrity
 - II. Leadership
 - III. Professional Conduct
 - IV. Responsible
 - V. Trustworthy
- 2.3 Employee who, in the course of their activities relating to their employment at Triterra, encounter actual or suspected violations of this policy are required to report their concerns to the Integrity Committee

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3.0 COMPLIANCE WITH LAWS, RULES AND REGULATIONS

- 3.1 All employees shall comply with all applicable laws, rules and regulations including the constitutions of the Group and guidance and directives issued by the authorities.
- 3.2 Employees have a continuing obligation to familiarise themselves with applicable laws relating to their job responsibilities and Triterra policies.

4.0 CONFLICT OF INTEREST

- 4.1 Employees have an obligation to act in the best interest of Triterra at all times.
- 4.2 Employees are prohibited from using their position or knowledge gained directly or indirectly in the course of their duties and responsibilities or employment for private or personal advantage.
- 4.3 If Employee at any time thinks that he or she may have a potential or actual conflict of interest, Employee is obliged to disclose the conflict promptly to the Integrity Committee (for any Director), HOD or Company's Human Resource Department.

5.0 ANTI-BRIBERY AND CORRUPTION

- 5.1 Triterra is committed to observe high standards of business, professional and ethical conducting all its business dealings and relationships wherever it operates and in implementing and enforcing effective systems to counter bribery and corruption.
- 5.2 Employees shall not offer, give, solicit or accept any bribes in order to achieve any business or personal advantage for themselves or others or engage in any transaction that contravene any applicable anti-bribery or anti-corruption laws.

6.0 CONFIDENTIALITY

- 6.1 Employees may come into possession or access to confidential, sensitive and non-public information ("Inside Information") in the course of their employment with Triterra.
- 6.2 Employees must treat all such information in strictest of confidence, not disclose such information to any unauthorised persons and take all necessary precautions to maintain such confidentiality and not use it, directly or indirectly, for any purpose other than what it has been intended, except when disclosure is authorised or legally required.

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7.0 WHISTLE BLOWING

- 7.1 Triterra has put in place a Group-wide [Whistle-blowing Policy and Procedures](#) to uphold the highest standards of professionalism, integrity and ethical behaviour in the conduct of its business and operations.
- 7.2 This policy sets out procedures which enables Employees and Stakeholders to raise genuine concerns regarding actual or suspected unethical, unlawful, illegal conducts, including violations to the Code.