



CODE OF CONDUCT FOR SUPPLIERS



1. Background

At Tomypak Holdings Berhad (“Tomypak”), we are committed to operating in a socially, environmentally, and ethically responsible manner. This includes our commitment to respect internationally recognised human rights as set out in the United Nations Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights, and the Ten Principles of the United Nations Global Compact, to the extent they are not contradictory to our religious beliefs, local culture, the Federal Constitution of Malaysia and state legislations

We believe that we have a responsibility not only to meet our own high standards but also to ensure that our suppliers uphold similar principles. This Code of Conduct for Suppliers (“Code”) outlines the minimum standards we expect of our suppliers in the areas of environmental sustainability, social responsibility, and governance, including respect for human rights and sanctions regulations.

The primary objective of this Code is to provide a platform for suppliers to become familiar with and conform to our company's sustainability principles. Tomypak expects suppliers to implement sustainable development practices with ethical business conduct in their own processes and supply chains, as outlined in the Code.

2. Scope

All suppliers and their employees, agents, contractors, suppliers’ supply chains and related entities (“Suppliers”) involved in providing goods and/or services are subject to this Code. Suppliers must take responsibility for familiarising themselves with this Code, whether provided to them directly or as made available on Tomypak’s website.

Additionally, suppliers must comply with all applicable laws, including sanctions regulations. This requires conducting sanctions screening against international lists (e.g., UN, OFAC, EU) and the Malaysian MOHA sanctions list to avoid engaging with sanctioned persons or entities.

3. Environmental Commitments

3.1 Compliance with Environmental Laws and Regulations

Suppliers must comply with all local, state, and national laws and regulations related to environmental protection, including but not limited to pollution control, waste management, hazardous waste disposal, water conservation, air quality, biodiversity conservation, and other relevant environmental concerns.

3.2 Reduction of Greenhouse Gas Emissions

Suppliers should endeavour to reduce their greenhouse gas emissions, such as by utilising renewable energy sources, reducing energy consumption and emissions from transportation, implementing energy-efficient practices, and adopting pollution mitigation measures. They should also consider the impacts of their operations on biodiversity and implement measures to prevent, minimise, and mitigate any negative effects on biodiversity.

3.3 Sustainable Use of Natural Resources and Biodiversity Conservation

Suppliers should strive to minimise the consumption of natural resources by adopting practices that promote sustainability, responsible sourcing of raw materials, efficient use of water and energy, and pollution prevention throughout their operations and supply chains. They should



implement measures to prevent, control, and reduce pollution, ensuring compliance with applicable regulations and industry best practices, while also considering the conservation of biodiversity.

3.4 Waste Management and Responsible Resource Use

Suppliers should implement effective waste management practices, such as waste reduction, recycling, reusing materials, proper disposal of hazardous waste, and pollution prevention measures. They should prioritize waste reduction strategies, employ recycling and reuse practices, dispose of hazardous waste in accordance with regulations, and consider the potential impacts on biodiversity when managing waste and utilising resources.

4. Social Responsibility

Our social responsibility standards are based on the Ethical Trading Initiative Base Code (“ETI”), the United Nations Universal Declaration of Human Rights, the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights, and the Ten Principles of the United Nations Global Compact and we expect our suppliers to share this commitment by upholding these standards and working towards improving their supply chain sustainability.

ETI includes the following social responsibility elements:

4.1 Employment is Freely Chosen

Workers should not be subjected to forced, bonded, or involuntary labour. They have the right to freely choose their employment and must not be forced to work under threat or coercion.

4.2 Freedom of Association and Right to Collective Bargaining

Workers should have the right to form or join trade unions and to bargain collectively for better working conditions. Suppliers must respect these rights and not discriminate against or penalize workers who exercise them.

4.3 Healthy and Safe Working Conditions

Suppliers are expected to provide a healthy and safe working environment for their employees, contractors, and visitors. They must comply with all applicable health and safety laws and regulations and take proactive steps to prevent accidents and injuries.

4.4 Child Labour

Suppliers must avoid child labour or forced labour in any stage of their operations or supply chain.

4.5 Living Wages

Wages should be sufficient to meet workers’ basic needs and provide some discretionary income. Workers must be paid at least the minimum wage or the appropriate industry benchmark and provide any legally required benefits.

4.6 Working Hours



Suppliers must ensure that working hours are not excessive and comply with all applicable laws and regulations related to working hours, including overtime hours, and provide their employees with adequate rest periods.

4.7 No Discrimination

Suppliers must not engage in any form of discrimination based on race, caste, nationality, religion, age, disability, gender, marital status, union membership, or political affiliation. Equality of opportunity and treatment should be provided to all.

4.8 Regular Employment

Suppliers should provide stable employment opportunities and avoid excessive use of fixed-term contracts or temporary labour. Workers should be informed of the nature of their work, terms of employment, and pay rates in a clear and understandable manner.

4.9 No Harsh or Inhumane Treatment

Suppliers must treat their workers with dignity and respect. Physical abuse, intimidation, or any other form of inhumane treatment is strictly prohibited.

5. Human Rights Due Diligence and Remediation

Suppliers should conduct due diligence to identify, prevent, mitigate, and account for how they address their impacts on human rights. This includes assessing potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed. If suppliers identify that they have caused or contributed to adverse human rights impacts, they should provide for or cooperate in their remediation through legitimate processes.

6. Governance

6.1 Compliance with Laws and Regulations

Suppliers must comply with all applicable laws and regulations related to their business, including but not limited to environmental protection, labour, health and safety, anti-corruption, data privacy laws, and sanction laws. This include ensuring that they do not engage with individuals or entities subject to sanctions, through sanctions screening against international lists (e.g., UN, OFAC, EU) and the Malaysian MOHA sanctions list.

6.2 Transparency and Accountability

Suppliers must maintain accurate and complete records and provide timely and accurate information to our company upon request. They must also establish appropriate internal controls and procedures to prevent any fraudulent or unethical behaviour.

6.3 Conflicts of Interest

Suppliers must disclose any potential or actual conflicts of interest to our company in a timely manner. They must take steps to mitigate and manage any conflicts of interest that may arise in their relationship with us.



6.4 Confidentiality and Data Privacy

Suppliers must maintain the confidentiality of our company's proprietary information and customer data. They must comply with all applicable data privacy laws and regulations, including those related to the collection, use, storage, and transfer of personal data.

7. Business Ethics

We believe that conducting business with high ethical standards is crucial for building and maintaining trust with our customers, suppliers, and stakeholders. We expect our suppliers to share this belief and uphold high standards of business ethics, such as specifically the following:

7.1 Avoid Conflicts of Interest

Suppliers must disclose any actual or potential conflicts of interest that may arise in their relationship with us. They must avoid situations where their personal interests or the interests of other parties' conflict with their obligations to our company.

7.2 Ensure Fair Competition

Suppliers must compete fairly and ethically in the market. They must not engage in anti-competitive practices, such as price-fixing, market-sharing, or bid-rigging.

7.3 Respect Intellectual Property

Suppliers must respect Tomypak's intellectual property and the intellectual property of others. They must not use, reproduce, or disclose our confidential information or trade secrets without prior written consent from both Tomypak and the respective parties involved.

7.4 Anti-Bribery and Anti-Corruption

Suppliers must comply with all applicable anti-bribery and corruption laws and regulations. They must not offer or accept bribes, kickbacks, or any other form of improper payment or benefit. Further information can be found in Tomypak's Anti-Bribery and Anti-Corruption Policy published on Tomypak's website.

7.5 Transparency

Suppliers must maintain accurate and complete records of their business transactions and activities. They should provide us with access to relevant records upon request and allow us to conduct audits to verify their compliance with this Code.

8. Monitoring

We expect our suppliers to uphold high standards of social responsibility, preservation of the environment, governance, and business ethics. To ensure compliance, we may monitor, and assess them as necessary, including new supplier evaluations via Tomypak's Supplier Audit Questionnaire. This monitoring may include checks for compliance with sanctions regulations, including screening against relevant sanctions lists.



We shall report any violations found and communicate with the supplier to manage the situation, ensuring compliance and continuous improvement. Upholding high standards builds and maintains trust with our customers and stakeholders, and we expect our suppliers to share this commitment.

9. Supply Chain Risk Management

Suppliers must actively manage risks within their supply chain to ensure the continuity and reliability of goods and services provided to Tomypak. This includes the following:

9.1 Risk Identification and Assessment

Suppliers should establish a systematic process for identifying, assessing, and prioritizing potential risks within their supply chain. This includes risks related to operational disruptions, quality issues, transportation, geopolitical factors, natural disasters, and other factors that may affect the timely delivery of goods and services.

9.2 Risk Mitigation and Management

Suppliers should develop and implement mitigation strategies to minimise the impact of identified risks. This includes contingency plans, alternative sourcing options, and robust quality assurance systems to ensure the reliability of their supply chain.

9.3 Communication and Collaboration

Suppliers must maintain open lines of communication with Tomypak regarding potential supply chain risks and their mitigation strategies. They should actively collaborate with Tomypak to address risks and vulnerabilities and develop joint risk management initiatives when appropriate.

9.4 Monitoring and Review

Suppliers must regularly monitor and review their supply chain risk management processes and update their mitigation strategies as necessary. They should report to Tomypak any significant changes in their supply chain risk profile or any incidents that may adversely impact the supply of goods and services.

10. Communication

This Code is available on the Tomypak website.

11. Guidance and Assistance

For any concerns or queries regarding the application of this Code, please contact our Procurement Department.

12. Review of Code

The Board of Directors of Tomypak may modify or amend this Code as needed to ensure compliance with laws and regulations and to accommodate organisational and business developments. The Code will be effective upon approval by the Board and public availability.



13. Appendix

Acknowledgment of Code of Conduct for Suppliers
