



Company Registration No.: 201101014489 (Malaysia)

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TRIDES SDN BHD — Code of Conduct & Ethics Policy

1. Introduction

At TRIDES Sdn Bhd (“TRIDES”), our reputation is built on integrity, professionalism, and trust. This Code of Conduct & Ethics Policy establishes the standards of behavior expected from all employees, directors, and business partners in conducting business activities on behalf of TRIDES.

We are committed to upholding ethical values, regulatory compliance, and professional accountability in all our operations. This Code complements our Environmental, Social & Governance (ESG) and Anti-Bribery & Corruption (ABC) policies.

2. Purpose

This Code serves as a guide to help every employee make responsible and ethical decisions that align with TRIDES’s values and the laws of Malaysia, including the Malaysian Anti-Corruption Commission (MACC) Act 2009, the Personal Data Protection Act (PDPA) 2010, and other applicable regulations.

All employees and representatives are required to adhere to this Code at all times.

3. Scope

This policy applies to:

- All TRIDES employees, officers, and directors (permanent, contract, or temporary).
- Business associates, including vendors, partners, consultants, resellers, and contractors acting on behalf of TRIDES.

Compliance with this Code is a condition of continued employment or engagement.

4. Core Principles of Conduct

All TRIDES personnel must:

- Act honestly, professionally, and in the best interest of the company.
- Comply with all applicable laws, regulations, and internal policies.
- Avoid conflicts of interest and declare potential risks immediately.
- Safeguard confidential information and client data.
- Treat all individuals with dignity, fairness, and respect.
- Protect company assets and use them responsibly.
- Foster a culture of transparency and accountability.

5. Conflicts of Interest

Employees must avoid any situation where personal interests could conflict — or appear to conflict — with the company's interests. Examples include:

- Financial interests in competitors, suppliers, or clients.
- Outside employment or consulting that interferes with TRIDES responsibilities.
- Nepotism or favoritism in hiring or procurement decisions.

All potential conflicts must be declared in writing to management for evaluation and approval.

6. Confidentiality and Data Protection

Information obtained through work at TRIDES must be handled responsibly. Employees must:

- Protect proprietary, confidential, and client information at all times.
- Comply with all data protection laws, including PDPA 2010.
- Refrain from disclosing information to unauthorized parties, even after employment ends.

Any suspected data breach must be reported immediately to the designated compliance or IT security officer.

7. Anti-Bribery, Corruption, and Fair Dealing

TRIDES adopts a zero-tolerance approach to bribery and corruption. Employees and partners must:

- Never offer, give, solicit, or accept any form of bribe or improper advantage.
- Conduct business with integrity, fairness, and transparency.
- Refer to and comply with the TRIDES Anti-Bribery & Corruption (ABC) Policy at all times.

Business dealings must be conducted on merit, with honesty and fairness toward clients, suppliers, and partners.

8. Workplace Behavior and Equal Opportunity

TRIDES is committed to a professional and respectful work environment. We do not tolerate:

- Discrimination based on gender, race, religion, or background.
- Harassment, bullying, or any form of workplace misconduct.
- Retaliation against employees who raise legitimate concerns.

Employees are expected to behave courteously, professionally, and supportively toward colleagues, clients, and business associates.

9. Use of Company Assets and Technology

All company assets — including information systems, devices, and intellectual property — must be used responsibly and only for authorized business purposes. Unauthorized use, sharing, or reproduction of company or client data is strictly prohibited.

The IT department may monitor system activity in accordance with company policy to ensure information security and compliance.

10. Reporting Misconduct and Whistleblowing

TRIDES encourages a transparent environment where employees can report unethical behavior safely and without fear of retaliation.

Reports may be submitted confidentially to:

- Immediate Supervisor or Line Manager
- Company Secretary (Compliance Office)
- Whistleblowing Channel (if applicable)

All reports will be handled confidentially and investigated impartially. TRIDES will protect whistleblowers acting in good faith from any form of victimization.

11. Disciplinary Action

Any violation of this Code may result in disciplinary action, including counseling, written warnings, suspension, termination, or legal proceedings, depending on severity. Business partners who breach this policy may have their contracts reviewed or terminated.

12. Review and Continuous Improvement

This policy will be reviewed periodically by the Company Secretary to ensure it remains relevant and aligned with applicable laws and best practices. Updates or revisions will be communicated to all employees and business partners.

13. Endorsement

This Code of Conduct & Ethics Policy has been approved by the Board of Directors of TRIDES Sdn Bhd and is effective as of January 2025

TRIDES SDN BHD
Driving Digital Identity, Securely and Responsibly.