



**Business
Code of Conduct
Policy**

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CEO Message

The core of our Company's business ethic is "doing the right thing." As a Company we are committed to observe the highest standards of ethics and integrity. Those standards are reflected in our Business Code of Conduct (our "BCoC") which explains what is expected of us at Tialoc. Ultimately, our BCoC helps us maintain the trust we have built with our stakeholders, and therefore ensures our business success.

Although Tialoc competes vigorously to achieve business success, it is important to remember that our Company is just as concerned with how our results are achieved. We expect all our employees to observe and maintain high standards of ethical conduct in their relationships with clients, suppliers, subcontractors, communities, fellow employees, and others, wherever they work. Any action taken by Tialoc or its employees, representatives, or agents must be fully justifiable and not raise questions as to the company's BCoC.

All our employees are required to participate in ethics awareness workshops annually and to complete compliance training as assigned. Such workshops are also extended to our key subcontractors and suppliers annually.

We also have a non-retaliatory policy to allow our employees, subcontractors, suppliers or any other business partners to inform the employee's manager, Tialoc's Ethics and Compliance manager if the employee, subcontractors or suppliers is aware of any incidents or situations concerning potential unethical conduct or conflicts of interest.

Our BCoC sets the standard on how we work with our employees, subcontractors, suppliers and business partners. These ethical standards have been the cornerstones of Tialoc' business since the company began in 2000.

Christoph Engel

Chief Executive Officer



Tialoc Business Code of Conduct

Tialoc is highly committed towards the best standards of social, environmental responsibility and ethical conduct. Tialoc is committed to provide safe working conditions, treat workers with dignity and respect, act fairly and ethically, and use environmentally responsible practices wherever Tialoc operates its business.

In order to further sustain and grow Tialoc’s business, it is imperative that all employees share and follow a common set of core values and behavior. These core values are the main principles that are the underlying foundations on which we want to conduct ourselves and we place a strong and uncompromising emphasis on these principles. Tialoc shall seek to retain and recruit personnel who fully understand and support those underlying core values. Those core values are:

Passion	Loving what we do with fun
Respect	Valuing our people, customers, communities and planet
Innovative	Work smart, inspire creativity, create value
Decisive	Purpose-driven to think, act and own
Excellence	Exceed expectations in what we strive for

Obeying the law, both in letter and in spirit, is the foundation on which Tialoc’s ethical standards are built. All employees and vendors must respect and obey the laws, rules and regulations of the cities, states and countries in which we operate, including the individual client’s rules and regulations or whichever is stringent. Although employees and vendors are not expected to know the details of each of these laws, rules and regulations, it is important to know enough to determine when to seek advice from respective managers or other appropriate HR personnel.

Labour

Tialoc upholds the human rights of workers and to treat them with dignity and respect as understood by the international community.

1.1 Prohibition of Forced Labour

Tialoc does not tolerate forced labour in any form, including transporting, harbouring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services.

1.2 Young workers

Tialoc does not engage or support child labor (“child” refers to any person under the age of 15). Tialoc does not employ workers under the age of 18 to perform work that is likely to jeopardize their health and safety.

1.3 Working Hours

Working Hours shall not exceed the maximum set by law. Further, a work week shall not be more than the permissible hours per week set by the local laws, including overtime, except in emergency or unusual situations. All overtime shall be voluntary. Workers shall be allowed at least one day off every seven days.

1.4 Wages and Benefits

Tialoc ensures that all wages, benefits and social security system contributions comply with pertinent laws and regulations which includes minimum wages, overtime hours and legally mandated benefits. Workers are compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure are not permitted.

1.5 Non-Discrimination/Non-Harassment/Humane Treatment

Tialoc is firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any harsh and inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming or verbal abuse, and also illegal discrimination or harassment based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and in employment practices such as promotions, rewards and access to training. Tialoc recruits and selects employees based on merit, ability, performance, contribution and experience.

Environmental, Health and Safety (EHS)

Tialoc strives to provide employees with a safe and healthy with pollution free work environment by ensuring the workplaces, machineries, equipment and processes under Tialoc control are safe and without risk to health. Each employee has the responsibility by following the EHS rules and procedures. Tialoc also takes precautionary approach to environmental matter, undertaking initiative to promote environmental responsibility, diffusing environmentally friendly technologies.

2.1 Occupational Safety and Environmental Protection

Tialoc adheres to all applicable laws, regulations and customer requirements in protecting environment by monitoring the safe handling, storage and disposal of hazardous substances. Workers are provided with appropriate, well maintained personal protective equipment (PPE) wherever a potential exposure to safety hazards identified. Emergency plans and response procedures are implemented to minimize impact of potential emergency situation through emergency drills at least annually or as required by local, whichever is more stringent. Reasonable steps are taken to remove or reduce pregnant women/nursing mothers from high hazardous working conditions and reasonable accommodations for nursing mothers are provided within working premises. Procedures and systems are in place to encourage workers to report occupational injury and illness and implement corrective actions to eliminate it.

2.2 Sanitation, Food and Housing

Workers are provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage and eating facilities as and when applicable. Dormitories (when required) are provided with appropriate emergency egress, adequate lighting and ventilation with necessary amenities.

2.3 Health and Safety Communication

Tialoc provides workers with appropriate workplace health and safety related information and training to understand the identifiable workplace hazards that the workers are exposed to. Health and safety related information are posted in location accessible and identifiable by workers and they are encouraged to raise safety concerns without retaliation. All workers are provided with training prior to the beginning of work and regularly thereafter.

Ethics

Tialoc upholds the highest standards of ethics in meeting its core values in the business operation. All business dealings should be transparently performed and accurately reflected on Tialoc's business books and records.

3.1 Conflict of Interest

A conflict of interest arises when

- a person's private interest interferes in any way, or even appears to interfere with the interests of the Company
- an employee or vendor takes actions or has interests that may make it difficult to perform his or her Company work objectively and effectively
- an employee or vendor (or a member of his or her family) receives improper personal benefits as a result of his or her position in the Company
- a Company's employee or vendors work for a competitor, customer or supplier

Conflicts of interest are prohibited as a matter of Company Policy, and all employees should avoid any direct or indirect business connection with customers, suppliers or competitors.

3.2 No Improper Advantage

Tialoc has a zero- tolerance policy in prohibiting any and all forms of bribery, corruption, extortion and embezzlement that covers

- promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party
- soliciting gifts, entertainment or favors from vendor, subcontractor or supplier

If a gift creates an obligation or appear to create an obligation, it is likely to be viewed as a bribe. Tialoc strictly follows anti-corruption and anti-bribery laws set by the country's local laws in which Tialoc operates. Company has enforced GMET (gifts, meals, entertainment, travel) Policy to implement best business practices and good corporate governance. It serves as the protocol, process and specific on the approval and reporting requirements. All GMET and business dealings on behalf of Tialoc should be transparently performed and accurately reflected and recorded with appropriate receipts or proper documentation on Tialoc's books and records. No GMET on Tialoc's behalf to government official prior approval.

3.3 Disclosure of Information and Data Privacy

Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsifications of records or misrepresentations of conditions are unacceptable. All the Company's books, records, accounts and financial statements must be

- maintained in a reasonable detail,

- appropriately reflect the Company's transactions
- promptly disclosed in accordance with any applicable laws or regulations
- conform both to applicable legal requirements and to the Company's system of internal controls

It is prohibited to directly or indirectly take any action to coerce, manipulate, mislead or fraudulently influence the Company's independent auditors for the purpose of rendering the financial statements of the Company.

Employees and vendors must maintain the confidentiality of proprietary information entrusted to them by the Company or its customers or suppliers, except when disclosure is authorized in writing by the top management or required by any laws or regulations. Proprietary information includes all non-public information that might be of use to competitors or harmful to the Company or its customers or suppliers if disclosed. The obligation to preserve this information continues even after employment ends. Unauthorized use or distribution of this information is a violation of Company policy. It could also be illegal and results in civil or criminal penalties.

3.4 Protection of Identity and Non-Retaliation

Employees are encouraged to talk to supervisors, managers or other appropriate personnel when

- observed or perceived behaviors that they believe may be illegal
- violates the Company policy or the Code of Conduct
- when in doubt about the best course of action in a particular situation

The Company ensures and maintains the confidentiality and protection of supplier and employee whistleblowing complaints or grievances. It is the policy of the Company not to allow or tolerate any retaliation against anyone who in good faith reports possible non-compliance of the Code of Conduct, legal and other requirements. Tialoc has a communicated process for employees and suppliers to raise any concern without fear of retaliation.

Management System

Tialoc adopts and establishes a Management System in accordance with Tialoc Business Code of Conduct and are committed to continual improvement and responsible for supervising the due and compliance execution and implementation.

Tialoc Group management periodically review the adequacy, suitability and effectiveness of the company's policy, procedures and results and implement appropriate amendments and improvements when necessary.

Management maintains procedure to identify and monitor all employees and vendors in respecting and obeying the laws, rules and regulations of the cities, states and countries in which Tialoc operates.

Tialoc Group also has established a method in the form of programs and/or operational control in identifying, managing and minimizing the risk in terms of labor, ethics, environmental aspect and occupation health and safety hazards issues. The effectiveness of the Management System is also executed through periodic internal audits by trained auditors.

Company provides a confidential means through Whistleblower Policy for all employees and business partners to report non-conformances with the policy contents. Company refrains from disciplining, dismissing or discriminating against any personnel for providing information. Any confidential issue can be communicated to our Management and Ethics & Compliance Department addressing the concern related thereto. For easy reference below are the points of contact:

Points of Contact

Chief Corporate Management and Risk Officer

[Tel: +65 6341 5018]

Ethics & Compliance Senior Manager

[Tel: +604 403 9188]

Chief Human Resource Officer

[Tel: +604 403 9188]

Report can also be sent to:

ethics.comp@tialocgroup.com

Or by filling the complaint form in the below link:

<https://www.tialocgroup.com/our-business-code-of-conduct/>

Whistleblower Process

