



**TOP GLOVE CORPORATION BHD**

**199801018294 (474423-X)**

# Employee Code of Conduct

Adopted by the Company on 25<sup>th</sup> August 2014

Revision effective 1<sup>st</sup> July 2020

# TOP GLOVE CORPORATION BHD

## EMPLOYEE CODE OF CONDUCT

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### INTRODUCTION

Top Glove Corporation Bhd and all its subsidiary companies (“Company”) have adopted the following Employee Code of Conduct (“Code”). This Code sets out the underlying values, commitment, dedication, diligence and professionalism contributing towards the social and environmental growth of the surroundings in which the Company operates.

The Company’s professionalism, honesty and integrity must at all times be upheld in the Company’s business dealings with:

- a. customers,
- b. vendors,
- c. suppliers and contractors,
- d. government and regulators,
- e. investors,
- f. the business community as a whole, and
- g. in the relationship with its own employee(s).

It is the responsibility of every employee to act in accordance with the policies detailed in the Code and any updates or amendments which may be issued from time to time by the Company.

The Company reserves the right to amend, delete or add any provision in this code as and when it deems necessary. All updates made to this Code shall be published in the intranet portal of the Company at <http://tgconnects/> and shall be brought to the attention of each employees by GHR by way of email prior to the effective date of the updates.

If you have any further questions with regards to the Code, please contact the following personnel:

- i. **Mr. William Yap** (General Manager, Group HR)  
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### DEFINITIONS

The following definitions shall apply unless otherwise expressly stated in the Code:

<b>Company</b>	Top Glove Corporation and its subsidiaries
<b>Confidential Information</b>	Any information pertaining to the Company, its business or any other related matter which are confidential in nature and which:  a) The Company reasonably believes that release of the information will be injurious to it or advantageous to its trade rivals.  b) The Company reasonably believes that the information has not been made public; and  c) The above two (2) criteria are to be judged in the light of usage and practice in the industry in question.
<b>Employee</b>	A person under the employment of the Company including permanent, contract, and temporary employment. Where an employee is employed under a contract, the terms and conditions of his contract shall apply where they differ from the policies in this Code.
<b>GHR</b>	Group Human Resources Department
<b>Prohibited Substances</b>	Alcoholic beverages, controlled substances and dangerous drugs except for those made available to an employee under doctor's prescription.
<b>Relative</b>	Parents, spouse, children, brothers, sisters, grandparents, parents-in-law of the relevant employee.
<b>TG ESS</b>	Top Glove Employee Self Service
<b>Managers</b>	Managers include the line managers, team leaders, group head of department (GHOD), head of factories (HOF) and persons having managerial responsibility.
<b>TGPAC</b>	Top Glove Prevention and Anti-Corruption Committee
<b>Management</b>	Management team consist of Chairman, Managing Director, Executive Director and Director of the Company.

All reference of the masculine gender shall include the feminine gender unless otherwise expressly stated. All words importing the singular number shall include the plural number and vice versa.

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### 1. PURPOSE

This Code is formulated with the intentions of achieving following aims:

- 1.1. To encourage high standards of honesty and integrity expected of employees.
- 1.2. To ensure that the Company business interaction should not in any circumstances, tainted by malpractices.
- 1.3. To provide guidelines on the manner in which employees should conduct themselves at work place, while performing their daily duties.

### 2. RESPONSIBILITY AND ACCOUNTABILITY

#### 2.1 Employees

All employees are to comply with this Code.

#### 2.2 Managers

Managers have added responsibility to set good example and to lead the employees under their supervision in the application of the Code in their daily business conduct. They are also responsible for promoting open and honest two-way communication to facilitate discussion where the application of this Code is unclear.

### 3. EMPLOYEE CONDUCT

#### 3.1. Workplace Environment

- a. Employees shall strive to maintain healthy, safe and productive work environment by adhering to the highest standard of professional conduct. They should in all respect and at all time, conduct themselves with honesty, propriety and must not in any circumstances, commit any act that would bring damage to the Company, its property, reputation or general interest.
- b. Employees are expected to have respect and tolerance for culture and religion and maintain a work environment that is free from discrimination or harassment based on gender, race, political opinion, national origin, marital status (including pregnancy), age, disability, disease or other factors that are unrelated to the Company's legitimate business interests.

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- c. Employees shall avoid any conduct in the workplace that creates, encourages or permits any offensive, intimidating or inappropriate work environment including, but not limited to:
  - i. Threats or comments that contain discriminatory or harassment elements.
  - ii. Unwelcome sexual advances.
  - iii. Violent behaviour or actions.
  - iv. Misuse or abusive of positions of authority.
  - v. Inappropriate dressing in violation of the dress code policy of the Company.

### 3.2. Employment

- a. Employees employed in the Company shall meet the legal working age required under Malaysian employment law. The Company does not support child labour.
- b. The Company is opposed to forced or compulsory labour. It ensures that its employees enter into employment of their own free will. Employee competition restrictions are only applied to employees to protect genuine business needs.

### 3.3. Working Attitude

Employees are expected to be adaptive and optimistic with continued energy and confidence to meet global challenge.

- a. Attendance /Punctuality

Employees are required to adhere to the stipulated working hours of the Company and be punctual.

  - i. If an employee is unable to commence work on time on any particular day, he must inform his immediate superior at the earliest available opportunity and in any event no later than 12 p.m. on that day.
  - ii. Late attendance by an employee will be recorded in the respective employee's attendance record maintained in the Company's system (i.e. TG ESS).
  - iii. An employee who is unable to work because of illness should inform his immediate superior at the earliest available opportunity and submit his original medical

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certificate issued by the registered medical practitioners to his respective superior immediately on the day he returns to work.

- iv. An employee who would like to go on annual leave is required to apply annual leave via TGESS at least three (3) days in advance. It is the responsibility of the employee to ensure that leave application is approved prior going on leave.
- v. An employee must not, without good reason, be continuously absent from work for more than two (2) consecutive working days without having obtained prior approval for leave from his relevant superior. If the employee was not able to obtain such prior approval, he must inform his superior of the reason for such absence at the earliest opportunity during such absence.

### 3.4 Smoking Policy and Restriction

Smoking is strictly prohibited in all areas at all times, including but not limited to the following:

- a. Factory and Office Premises
  - b. Company Vehicles
  - c. Company Houses and Hostels
  - d. Non-Compliance
- i. Employees who are found smoking in contravention of this policy will be subject to disciplinary action(s) in accordance with the Company's disciplinary procedure.
  - ii. A breach of this policy will be treated as a gross misconduct, liable to summary dismissal without show cause or Domestic Inquiry, where the same employee has been given three (3) written warning throughout his employment relating to the same/similar case.
  - iii. Where smoking constitutes an immediate safety hazard/fire threat and combustible sites/facilities such behaviour will also be treated as gross misconduct and could render the employee liable to summary dismissal without notice.

### 3.5 Alcohol and Drug Abuse

Prohibited substances may not be brought, kept, consumed, sold, purchased or dealt with in any way on the Company's premises.

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- a. Employees shall not report for work or carry out their duties in the course of their employment under the influence of alcohol or drugs.
- b. If an employee is taking medication which renders him unable to carry out his duties in a manner that will jeopardise the safety of himself and/or the other employees, he must inform his superior accordingly.
- c. The Company may from time to time at its sole discretion require employees to be randomly test for the consumption of alcohol and illegal substances. Refusal by the employee to undergo such a test may warrant appropriate disciplinary action to be taken by the Company as it deems fit.
- d. The GHR shall be responsible for determining the details of such misconduct or problem and the appropriate action to be taken against the said employee, which may include, without limitation, reprimand, suspension or dismissal. The GHR may, if it considers appropriate in the circumstances, submit a report of such misconduct to the Management together with its recommendation of the appropriate disciplinary action to be taken against the said employee.

## 4. CODE OF ETHICS

### 4.1 Commitment

- a. All employees shall, in the course of their employment with the Company and in carrying out their duties and responsibilities in respect thereof, diligently and to the best of their ability perform such responsibilities and responsibilities as may from time to time be assigned or designated to them.
- b. All employees are expected at all times to promote and advance the interests of the Company and shall not do anything to bring disrepute to the Company.
- c. All employees shall obey, comply with and observe rules, regulations, procedures, practices, orders, directives and policies of the Company, whether expressed or implied in law or by custom and practice.



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### 4.2 Confidential Information

- a. The employee shall not indulge, engage or interest themselves either directly or indirectly, whether for reward or gratuitously in any work or business other than the performance of his duties to the Company. In addition, the employee shall maintain confidentiality of all matters pertaining to the Company's business, and not reveal our customers' details to anybody, especially to competitors whether during employment or 2 years after the termination of his service with the Company irrespective of any reason for such termination, make use or disclose to any party either for own benefit or for the benefit of any individual, firm, company, any trade or business, the affairs and confidential information of the Company or any of its related companies of which you have knowledge or become aware during the course of your service with the Company.
- b. The employee should not discuss whether among themselves or with others, within the workplace or outside the Company's premises, confidential information regarding the Company, its business partners, its customers or clients, its employees or any other confidential information except in the course of carrying out the Company's business.
- c. It is the Company's policy that any information pertaining to the Company in any way whatsoever and which are not generally available to the public shall be treated with utmost confidence. Such information must not be shared or used by any employee whether directly or indirectly to influence an investment decision in connection with the purchase or sale of securities.
- d. The first obligation of any employee who receives a subpoena or other request seeking the disclosure of confidential information pertaining to the Company is to contact his immediate superior or GHR for guidance.
- e. If the employee is found to have divulged or have caused to divulge or to have failed to use his best endeavours to prevent the disclosure of such information, the Company reserves the right to terminate the contract of employment forthwith without notice and/or to take the appropriate legal action against the defaulting employee including the employee shall indemnify the Company.

### 4.3 Publication using the Social Media

- a. Employees' use of social media, both when participating personally, as well as when acting on behalf of the Company, shall be guided by the Social Media Policy.
- b. All employees are strictly prohibited from publishing or writing messages or material that are intended to harm the reputation of the Company or and its Management on social media including but not limited to social networking sites, blogs, wikis,

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microblogs, message boards, chatrooms, electronic newsletters, online forums, and other sites and services that permit users to share information instantaneously. Particularly, it shall apply to the following social media platforms the Company is on:

- i. Facebook
- ii. LinkedIn
- iii. YouTube
- iv. Instagram
- v. Microsoft Yammer
- vi. Any other social media platforms

#### 4.4 Press Release and Public Statements

- a. An employee should inform his immediate superior if a member of the media approaches him for any information, statement or opinion concerning the Company. The immediate superior shall provide guidance to the employee on the appropriate response to the media's request.
- b. An employee shall not make any public statement on the policies or decisions of the Company whether orally or in writing or in any form whatsoever nor shall he circulate or cause to be circulated any such statement.

#### 4.5 Public Appearance as a Guest Speaker or Panel Member

Any employee who has been invited to appear as a guest speaker in a public forum in his capacity as an employee of the Company must, if he intends to make such appearance, submit the details and/or the topic(s) of his proposed speech to his immediate superior. The immediate superior shall in turn submit the same to the Management for their consideration. An employee may only make such appearance if prior approval has been obtained.

#### 4.6 Publications

Employees are not permitted to publish or distribute in any written or printed form, articles, books, periodicals, leaflets, brochures etc containing information relating to the Company without prior written approval of the Management.

### 4.7 Company Resources and Assets

- a. Employees are provided with a variety of resources and access to assets of the Company (types of assets as defined below), regardless of the condition of value, assets belonging to the Company shall not be misused, taken, sold, lent, given away or otherwise disposed of, or used for personal purposes to the extent that would affect the interest of the Company.
- b. The types of asset shall be protected and the responsibilities of employees are:
  - i. Physical Assets such as equipment, systems, facilities, supplies, etc shall be used only for conducting the Company's business or for purposes authorized by Management. They shall not be used for employees' personal activities.
  - ii. Records and Documentations especially internal documents with information that is strictly intended for internal use only (e.g. handbook, policy, memo, form, etc). Such documentation shall not be shared or distributed external parties, directly or indirectly.
  - iii. Information and Communication Systems including connections to the internet shall be used for conducting the Company's business or for other incidental purposes authorized by the Management of the Company. It is inappropriate to use them in a manner that interferes with employees' productivity.
  - iv. Proprietary Information where all information (whether in written or oral form and whether on paper or electronic form) relating to technical, product and services, financial data and projections, marketing strategies and business plans and directions, organizational and personnel information, decisions by the Company's board of directors, trade secrets and patterns, pricing guidelines, methodology or prices of products and services, manufacturing methods and processes, existing and prospective contracts, profit sharing arrangements, customer information, databases, records and any non-published financial or other data that are confidential in nature and is not public information or if known will have an adverse effect on the Company. Such information is the result of the innovation, ideas and hard work of employees and of substantial investments in planning, research and development. It is critical that employees treat such information as confidential in accordance with the requirements of legal policy and take all necessary safeguards to protect such information. The Company's ownership of such proprietary information shall continue even after the employee leaves the Company.
  - v. Intellectual Property Rights where all ideas, inventions or copyright produced by employees as a result of the work performed for or on behalf of the Company in the course of employment, whether that product is protectable or otherwise. Employees shall understand their responsibility to protect the Company's intellectual property and seek advice from their direct superior beforehand when in doubt of their

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obligation in this regard. The Company's ownership of such intellectual property shall continue even after the employee leaves the Company.

- c. Employees shall be responsible for protecting the Company's assets entrusted to them. Employees shall take all necessary steps to prevent theft, loss, damage to or misuse of assets belonging to the Company, the occurrence of which shall be reported immediately to the immediate superior.
- d. Employees are not allowed to use the Company's assets including equipment, resources and proprietary information for any personal use. Additionally, employees are not permitted to perform non-Company related work or solicit such business on the Company's premises while working during office hours.
- e. Employees shall return all the Company's assets entrusted to them upon cessation of their employment including documents which contain the Company's proprietary information. Additionally, they may not disclose or use the Company's proprietary or confidential information.

### 4.8 Data Integrity and Data Retention

- a. Employees shall record and report all corporate information and financial data processed by or that is required to be processed by the Company accurately and with integrity.
- b. Records shall be managed securely in line with their importance and in compliance with legal, tax, regulatory, accounting and other business retention requirements as required by applicable laws in the Country and regulations.

### 4.9 Insubordination and Inefficiency

An employee shall not commit any act of wilful refusal, insubordination or disobedience of any lawful and reasonable instruction of his superior/ manager including refusal to perform work assign, being inefficient and deliberately slowing down of work causing the quality and/or the quantity of work to be adversely affected.

### 5. CONFLICT OF INTEREST

Business decisions and actions must be based on the best interests of the Company and must not be motivated by personal considerations or relationships. Relationships with prospective or existing suppliers, contractors, customers, competitors, auditors or regulators must not affect our independent and sound judgment on behalf of the Company. General guidelines to help employees of the Company better understand several of the most common examples of situations that may cause a conflict of interest are listed below. However, you are required to disclose to the Management/ Group HR any situations that may be, or appear to be, a conflict of interest. When in doubt, it is best to disclose.

#### 5.1 Competing against Top Glove Group of Companies

- a. Employees shall not engage in activities that have conflict with the business interests, even in their own time, including commercially marketing products or services in competition with the current or potential offerings of the Company.
- b. Employees are not allowed to provide any form of assistance to organizations that market products or services in competition with the Company regardless if they receive any direct or indirect remuneration of any kind for the assistance provided.
- c. Accordingly, employees shall not work for the competing organization in any capacity as an employee, consultant or as a member of its board of directors within the first 2 years from his resignation date. In the event this clause is breached, an employee has to pay the company the sum of five (5) times of basic salary as the agreed liquidated damages and not as a penalty. Both parties agree that this does not limit the Company from taking other courses of action against the employee, including but not limited to injunctions and other damages.
- d. Employee is not allowed to participate in or influence the purchase of goods and services from any company or person in which or through which that employee has or will obtain a direct or indirect interest or benefit.
- e. Employees shall not use personal influence to get the Company to do business with a Company or a Supplier in which his family member, relative or friend has an interest. Where the employee has family member(s), relative(s) or friend(s) who are already providing services/supplies to the Company or intending to deal with the Company, the employee shall immediately disclose it to the direct superior/GHR, so that any conflict of interest will not arise that will compromise the employee's job functions.

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- f. Employee shall not act as director, officer, employee or partner of any other organization outside the group. Relationships with parties of another organization which are business/trade rivals to the Company should be disclosed to Management, for purposes of ensuring that the individual is not involved in any activity that may result in a conflict of interest, the conflict must be resolved and disclosed immediately.
- g. Employee who has immediate family as part of the reporting line be it direct or indirect shall at no time abuse his position and should always act in a fair and equitable manner in handling performance, career progression and reward matters.

### 5.2 Non Business Activity

- a. Employees are not permitted to engage in personal activities including public service or political activities which conflict with the Company's business interest.
- b. Any employee found to be employed or engaged in other businesses will be regarded to have wilfully breached a condition of employment and the Company reserves the right to terminate the contract of employment forthwith without notice or to take appropriate action as the Company deems fit.

### 6. BUSINESS CODE

#### 6.1 Bribes and Corruption

- a. Employees shall not offer, give, solicit or accept bribes in order to achieve business or personal advantages for themselves or others or engage in any transaction that can be construed as having contravened the anti-corruption laws.
- b. Employees shall be cognisant of the fact that bribes may be in any form, monetary or otherwise including but are not limited to unauthorized remuneration such as referral fee, commission or other similar compensation, material goods, services, gifts, business amenities, premiums or discounts of an inappropriate value or of an unreasonable level or that are not generally offered to others or that are prohibited by law or may reasonably be viewed as having crossed the boundaries of ethical and lawful business practice.
- c. Prior to giving or accepting any business amenity or other gifts (in whatever form or value), employees shall assess the appropriateness of their actions by assessing if the action could influence or could reasonably give the appearance of influencing the business relationship of the Company with that organization or individual or any business decision arising out of that business relationship.

#### 6.2 Gifts and Favours

- a. It is the policy of the Company that no employee or any member of his family will accept any form of gifts or favours from contractors, suppliers, clients/customers, or any other party having business dealings with the Company.
- b. Employees shall declare all gifts offered and received to Integrity Unit via TG GIFTS online platform. Refer Appendix 1 on the Approval Level for Receiving & Offering Gifts, Hospitality & Entertainment.
- c. All employees shall, if in doubt as to the nature or purpose of the gift or favour consult the Integrity Unit who shall decide, either in consultation with or through his own accord, the course of action in respect of such gifts or favour.
- d. Employees shall also be bound by the Guideline for Receiving & Offering Gifts, Hospitality & Entertainment provided as part of this Code [refer appendix 1].
- e. Any employee found to have received gifts or favours in contravention to the above provisions shall be subjected to disciplinary action.

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### 6.3 Entertainment

- a. Employees shall not accept any gratuitous entertainment from any of the Company's clients, customers, suppliers, contractors or any third party with whom the Company has business dealings with unless such entertainment is able to be reciprocated by the employee:
  - i. In his personal capacity; or
  - ii. By obtaining reimbursement from the Company as part of the Company's business entertainment expense.
- b. Employees shall also be bound by the Guideline for Receiving & Offering Gifts, Hospitality & Entertainment provided as part of this Code (refer appendix 1).

### 6.4 Personal Solicitation

- a. The Company discourages any solicitation by employees during working hours as such solicitations normally disrupt business activity and work routines.
- b. Employees are not permitted to sell, distribute or act as agent for the sale or distribution of any type of food or merchandise in the office premises whether during or outside office hours.

### 6.5 Family Member/ Relative of Employees

- a. Employees shall disclose to the Company if any family member/ relative provides any form of goods or services direct or indirect to the Company, or is a competitor, vendor, business partner, contractor or consultant to the Company. Employees shall avoid or abstain from participating in or making decisions on any deal involving employee's family member/ relative.
- b. If employee's family member/ relative is a competitor or supplier of the Company or is employed by one, employees are expected to exercise extra caution in their communication and conduct to ensure the security and confidentiality of information important to the Company and to avoid and/or create a conflict of interest situation.

### 6.6 Marriage and Transfer

In the event of a marriage between employees of the Company within the same department, one partner to the marriage may be relocated to another department at the absolute discretion of the Company.



### 7. DISCIPLINARY ACTION

Any employee who commits misconduct or a breach of rules established by the Company, shall be subject to disciplinary action.

a. Misconduct

Misconduct in employment can be broadly dealt with under three (3) headings namely:

- i. Misconduct relating to **duty** such as carelessness, misappropriation, insubordination, breach of confidential Company information and etc;
- ii. Misconduct relating to **discipline** such as fraud, theft, fighting, assault, gambling, damage to Company property, drug abuse etc; and
- iii. Misconduct relating to **morality** such as committing an indecent act, sexual advancement, pornography, keeping or distributing indecent or pornographic literature at the workplace, etc.

Appendix 2 provides a list of some common acts of misconduct.

b. Inquiries

- i. A panel appointed at the discretion of the Company shall conduct all inquiries. The inquiry panel shall not include a member(s) whose presence may affect the impartiality of the panel in its conduct of the proceedings and its recommendations.
- ii. The proceedings of an inquiry shall be duly recorded by the panel for submission to the GHR or to the appropriate higher authority for decision.
- iii. The Company may suspend an employee for a period of not exceeding two (2) weeks pending an inquiry during which he shall be paid half of his basic salary.

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### c. Action by the Company

- i. All disciplinary actions taken by the Company shall comply with the Company's established procedures and current legislation. Where there is any conflict between the two, current legislation shall prevail.
- ii. HOD may issue written warnings on the advice of the GHR. All written warnings shall be recorded in the employee's personal file. In the event where three (3) warning letters for a similar offence have been issued within a period of twelve (12) months, the employee shall be subject to an inquiry to determine further disciplinary action.
- iii. Depending on the gravity of the offence committed and after due inquiry, the employee may be subject to any of the following punishments:
  - Dismissal without notice;
  - Demotion;
  - Suspension from work without pay;
  - Transfer to another department, division and/or location;
  - Issue with a written Warning letter
  - Impose any other lesser punishment as the Company deems just and fit

### d. Summary Dismissal

The Company reserves the right to dismiss an employee after due inquiry for misconduct including but not limited to dishonesty, insubordination, gross neglect of duty, bankruptcy and criminal conviction, within reasonable time after the misconduct in question without notice, salary or other forms of compensation.

This right is in addition to and does not prejudice its other rights under law.

### e. Termination of service

- i. Notice of termination of service shall be made in writing and in accordance with the Employee Terms and Conditions of Service.
- ii. In lieu of such notice, the employee or the Company shall pay a sum equivalent to the salary for the notice period required.

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- iii. An employee shall surrender all Company documents, files, vehicles, keys and other Company property in his possession upon his termination of service in the Company.
- iv. The employee shall reimburse the Company the value of the replacement cost for any item(s) or the Company property that is lost or destroyed while under his custody.
- v. The employee shall settle all outstanding liabilities and obligations with the Company before any monies due to him are to be released.

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### Appendix 1: Guideline for Receiving & Offering Gifts, Hospitality & Entertainment

All employees are required to declare any offering or receiving of gifts, hospitality and entertainment to Integrity Unit via TG GIFTS online platform within seven (7) working days.

Num.	[A] GUIDELINE FOR RECEIVING GIFTS, HOSPITALITY & ENTERTAINMENT			
	Category	Unobjectionable	Acceptable Limit (RM)	Objectionable
1	<b>GIFT / SOUVENIR</b>	Gift / Souvenir of Corporate Nature Presented with a legitimate business purpose or normal gifts such as food items which are unlikely to sway buying decisions, and the edible treats should be shared with other employees within the same department/office.	RM20 ≤ x ≤ RM150	Monetary gifts/ cash voucher/ discount card/ membership offered
2	<b>HOSPITALITY</b>	Meal Hospitality from supplier, contractor, subcontractor or consultant by offering meals together during: a) suppliers visit b) outstation /long distance pre-qualification audit, c) supplier audit or site inspection	RM20 ≤ x ≤ RM40 / pax *normal / decent restaurant and not overly fancy restaurant	Hospitality from supplier, contractor or consultant by offering meal together during half a day / short distance pre-qualification audit, supplier audit or site inspection.  <u>Tips to avoid the invitation:</u> Arrange the audit after lunch time or try to finish the audit before lunch time.
		Company events: Annual Dinner/ Open house, etc. Invitation to attend supplier, contractor, sub-contractor or consultant company event openly in normal course of business to promote good business relationship. Attending in a group of two or more persons in representing Top Glove.	All invitation received or must be declared and reported to immediate HOD & the Management	Personal Invitation from Supplier, contractor, sub-contractor or consultant to attend any occasions with the deliberated intention to improperly gaining business advantage.
3	<b>ENTERTAINMENT</b> Shows, concert, movies, karaoke, theme park, etc	Entertainment offered by supplier, contractor, sub-contractor, consultant or customer during oversea working trip.	RM40 / pax [max]	Entertainment regardless of value offered by supplier, contractor, sub-contractor, consultant or customer as a personal treat outside working hours.

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Num.	[B] GUIDELINE FOR OFFERING GIFTS, HOSPITALITY & ENTERTAINMENT				
	Category	Unobjectionable	Acceptable Limit (RM)		Objectionable
			Executive Level & Below	Manager & Above	
4	<b>GIFT / SOUVENIR</b>	Gift / Souvenir of Corporate Nature Presented with a legitimate business purpose or normal gifts such as food items which are unlikely to sway buying decisions	<b>Local Guest:</b> RM20 ≤ x ≤ RM40/pax <b>International Guest:</b> RM20 ≤ x ≤ RM60/pax	<b>Local Guest:</b> RM20 ≤ x ≤ RM80/pax <b>International Guest:</b> RM20 ≤ x ≤ RM100/pax	Monetary gifts/ cash voucher/ discount card/ membership offered
5	<b>HOSPITALITY</b>	Meal	<b>Local Guest:</b> ≤ RM30 / pax <b>International Guest:</b> ≤ RM50 / pax	<b>Local Guest:</b> ≤ RM40 / pax <b>International Guest:</b> ≤ RM60 / pax	Expensive meal served including spouse or other guests of the invitee.
		Company events: Annual Dinner/ Open house, etc.	Invitation for attending Top Glove's events openly in normal course of business to promote good business relationship <i>*upon Management approval</i>	Nil	Nil
6	<b>ENTERTAINMENT</b> Shows, concert, movies, karaoke, theme park, etc	Entertainment offered to international customer / auditor/inspector. <i>*upon Management approval</i>	<b>Local Guest:</b> ≤ RM30 / pax <b>International Guest:</b> ≤ RM50 / pax	<b>Local Guest:</b> ≤ RM50 / pax <b>International Guest:</b> ≤ RM60 / pax	Entertainment regardless of value offered by supplier, contractor, sub-contractor, consultant or customer as a personal treat outside working hours.

Remark: In the occasion of the Company's guideline clashes with another party's guideline, to follow whichever lower.

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### Approval Level for Receiving & Offering Gifts, Hospitality & Entertainment.

Category	1 <sup>st</sup> Approval / Acknowledgement / Declaration	2 <sup>nd</sup> Approval / Acknowledgement / Declaration	
		If the amount used or planned is within the acceptable limit as stated	If the amount used or planned is exceeded the acceptable limit as stated
Gift / Souvenir	Immediate Superior / Head or Team	Head of Department / Head of Group	Executive Director / Managing Director / Executive Chairman
Hospitality			
Entertainment			

### Appendix 2: List of Common Acts of Misconduct

Acts of misconduct include but are not confined to the following:

1. Theft/Pilferage/Misappropriation or any attempt of the same of the Company's money or property or other employee's money or property within the Company's premises.
2. Fraud, cheating, dishonesty, falsification or any attempt of the same in connection with the Company's business, money or property.
3. Fighting, assaulting, abusing or being violent towards another individual (be it employee or authorized visitor) on the Company's premise including threatening to do the aforesaid.
4. Soliciting, accepting and/or offering bribes or any illegal gratification.
5. Unauthorised participation and interference in the financial transactions of the Company.
6. Participation in illegal strikes or inciting other employees to participate in the aforesaid.
7. Instigating industrial action against the Company in contravention of applicable laws and regulations.
8. Unlawful picketing in the Company's premise except where permissible under the applicable law and regulations or agreement.
9. Wilful insubordination or disobedience (whether alone or jointly with others) to any lawful and reasonable order given by the superior.
10. Conflict of interest or breach of fiduciary relationship with the Company.
11. Bringing in unauthorized visitor(s) into Company's premise without prior approval from the Management.
12. Making public statements in any form or spreading malicious rumours about the Company which are disadvantageous to the commercial interest of the Company.
13. Gambling whether involving money or otherwise, in the Company premises.
14. Habitual neglect of duty or habitual slacking in performance.
15. Interfering with the record of his attendance or of any other employee or falsification, defacement or destruction of any record of the Company.
16. Sleeping while on duty.
17. Possession of illegal weapon or lethal weapon on the Company's premises.
18. Riotous, disorderly or indecent behaviour on the Company's premises.
19. Smoking in the Company's premises.
20. Possession or consumption of illegal substance or drug abuse.

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21. Unlawful and unauthorised disclosure of confidential information of the company to third party including but not limited to proprietary information, commercial/manufacturing secrets, calculations or designs.
22. Commission of any forms of harassment including but not confined to unwelcome verbal statements, comments or remarks and/or physical advances be it sexual, racial, physical, personal, religious or otherwise which may be degrading, derogatory or discriminatory in nature.
23. Habitual late attendance to work and/or absenteeism.
24. Commission of any immoral act or any subversive acts which is not in accordance with the discipline of the Company or against any applicable laws or regulations.
25. Making false declarations to the Company.
26. Possession, sale or distribution of unsuitable, indecent or pornographic materials.
27. Wilful failure to report serious infectious or contagious illness or disease to the Company's medical officer or Corporate Health.
28. Malingering and feigning illness.
29. Forging or defacing medical certificates or other official documents to defraud the Company.
30. Conduct which is likely to cause injury or endanger the life or safety of another person within Company's premises.
31. Overstaying sanctioned leave without sufficient grounds or proper satisfactory explanation or without informing or attempting to inform his employer of the excuse or reason for such absence.
32. Wilfully causing damage or loss to the Company's property or goods.
33. Deliberate damage and interference with the contamination of factory processes, material or equipment.
34. Posting, altering, removing, defacing or destroying the Company's notices or any material on bulletin boards or the Company's property without the permission of the management.
35. Habitual failure to wear uniform at work place as per the Company's dress code and grooming policy.
36. Loitering during working hours or leaving work place during working hours without permission of the immediate superior.
37. Failure to follow safety procedures / regulations or tampering with safety devices to the detriment of the Company or its employees.
38. Abuse or unauthorized use of the Company's property, utilities, equipment or facilities including driving the Company's vehicles.



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39. Habitual or substantial negligence in the care of tools, equipment and apparatus of the Company.
40. Wilful failure to report at once to his superior any defect which an employee may notice in any equipment connected with his work or which might endanger himself or any other person or which might result in damage to the Company or any person within the Company.

The above examples of misconduct are not exhaustive as the Company reserves the right to determine what constitute acts of misconduct that warrant disciplinary action.

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### TOP GLOVE CORPORATION BHD

#### CODE OF CONDUCT

#### DECLARATION BY EMPLOYEE

I, \_\_\_\_\_ (NRIC/Passport No. \_\_\_\_\_),  
hereby confirm that I have read and understand the contents stated in this Code and agree to  
observe and adhere to this Code, as amended from time to time.

I shall conduct myself with complete professionalism, integrity and be true to the spirit of the Code  
in the daily execution of my duties and assignments and as an employee of **Top Glove Group of  
Companies.**

I acknowledge that failure to abide by the Code may lead to appropriate action being taken against  
me.

\_\_\_\_\_  
Name :

Badge Number :

Date :