



TOP GLOVE CORPORATION BHD

Company No. 199801018294 (474423-X)

Sales & Marketing Code of Conduct

Effective 21st March 2023

The Top Glove Corporation Bhd (“**Top Glove**”) Sales & Marketing Code of Conduct is a reference for use to all sales and marketing employees within the company. This document does not describe all applicable laws or Top Glove’s policies or gives full details on any particular law or policy. This is not a legal and/or contract document. Top Glove reserves the right to alter, modify, revise, cancel or waive any policy, procedure or condition without further notice and without revision of the Code. The provisions of the Code may be revised and modified by Top Glove from time to time to adapt them to local laws and regulations.

Revised

21st March 2023 on Clause 4.6 by TG Customer Centric Team

TOP GLOVE CORPORATION BHD

Sales & Marketing Code of Conduct

INTRODUCTION

Top Glove Corporation Bhd and all its subsidiary companies (“Company”) have adopted the following Sales & Marketing Code of Conduct. 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 sales and marketing employees by way of email prior to the effective date of the updates.

The Company’s professionalism, honesty and integrity must at all times be upheld by our sales and marketing employees in the business dealings with the following parties as below:

- a) Customers,
- b) Vendors,
- c) Suppliers and Contractors,
- d) Government and Regulators,
- e) The business community as a whole,
- f) In the relationship with other employees.

This Code is one of the ways we encourage all of our sales and marketing employees at the Company to put their underlying values, commitment, dedication, diligence and professionalism towards the social and environmental growth of the surroundings in which the Company operates. Hence, employees are required to read through the Code and act in accordance with the policies detailed in the Code. Do not hesitate to seek the advice of your superiors if you have any questions on how to interpret this code. In the case where you think that one of your fellow sales and marketing colleagues or the company as a whole may be falling short of commitment, do not be silent. We want and need to hear from you!

How to raise an integrity concern

Disclosures can be submitted in good faith through the following channels as below:

1. **Via email:** TG@whistleblower.com.my
2. **Via mail box:**
PO BOX #911
L2-08, Level 2, Cheras Leisure Mall,
Jalan Manis 6, Taman Segar,
56100 Kuala Lumpur, Malaysia

Please mark the envelope “Strictly Confidential. To be opened by the addressee ONLY.”

**All disclosures will be treated in the strictest confidence*

3. **Via Online Form:** <https://www.topglove.com/whistle-blowing>

TOP GLOVE CORPORATION BHD

Sales & Marketing Code of Conduct

Table of Contents

INTRODUCTION	2
1. PURPOSE	4
2. RESPONSIBILITY AND ACCOUNTABILITY	4
2.1. Marketing Employees	4
2.2. Marketing Managers and Head of Teams	4
3. SALES & MARKETING CONDUCT	4
3.1. Sales, Marketing, Advertising and Promotional Activity	4
3.2. Engagement with Customers	5
4. CODE OF ETHICS	6
4.1. Safeguarding Information	6
4.2. Anti Bribery & Anti Corruption Obligation	6
4.3. Environmental and Sustainable Business Practices	7
4.4. No Dealing with Customer from Sanctioned Territories	7
4.5. Anti-Competitive	8
4.6. Ethical Interaction with Customers	8
5. PENALTIES	9

TOP GLOVE CORPORATION BHD

Sales & Marketing Code of Conduct

1. PURPOSE

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

- 1.1. To ensure high standards of honesty and integrity are practiced by our sales and marketing employees. This Code will provide a guideline on the manner in which our sales and marketing employees should conduct themselves at the workplace while performing their daily duties.
- 1.2. To encourage the marketing department to be involved in sustainability initiatives such as promoting our biodegradable products to our customers, introducing sustainable packaging and initiating ecofriendly practices within the department.
- 1.3. To initiate marketing ethics in all sales & marketing related areas such as marketing research, e-commerce, direct marketing promotion and advertising on social media or any other platform in order to meet customers' needs. Employees must never engage in price fixing.

2. RESPONSIBILITY AND ACCOUNTABILITY

2.1. Marketing Employees

All employees whether full time, part time, fixed term, permanent and/or trainees in the marketing department are to comply with this Code.

2.2. Marketing Managers and Head of Teams

Managers and Head of Teams in the marketing department have added responsibilities to set good examples, monitor and lead the employees under their supervision in the application of the Code in their daily business conduct.

3. SALES & MARKETING CONDUCT

3.1. Sales, Marketing, Advertising and Promotional Activity

- 3.1.1. All Sales & Marketing employees must adhere to all applicable marketing and other related laws, treaties, rules and regulations.
- 3.1.2. All Sales & Marketing employees must describe our products and their uses truthfully, accurately, and transparently, with appropriate and sufficient information for customers to understand its properties and uses.
- 3.1.3. All Sales & Marketing employees must be mindful of the environmental implications of sales & marketing activities, especially in areas such as new product development, product packaging and recycling.
- 3.1.4. Sales & Marketing employees that are responsible in the creation of advertising and promotional materials are required to ensure that the information shown are clear,

TOP GLOVE CORPORATION BHD

Sales & Marketing Code of Conduct

unambiguous, accurate and fair, does not contain false or misleading information about price, value or service and does not belittle other companies.

- 3.1.5. Sales & Marketing employees that are managing the company social media or other platforms that represent the Company on a corporate level are to ensure that the utmost care is taken to maintain and uphold the corporate image of the Company. All Sales & Marketing employees shall follow the guidelines as stipulated in the latest revision of Advertising Principles and HRM – Social Media Policy.

3.2. Engagement with Customers

- 3.2.1. **Be mindful that you are representing the Company.** Sales & Marketing employees are expected to be respectful of all individuals, regardless of race, colour, sex, language, religion, political or other opinion, national or social origin, or other status such as physical or mental ability, age, marital and family status, sexual orientation and gender identity, health status, economic and social situation at all times;

- 3.2.2. **Never post discriminatory, offensive or libelous content and commentary.** Do not post or transmit any message, content or link to content that is abusive, hateful, homophobic, discriminatory, malicious, aggressive, threatening, violent, sexist, harassing, inflammatory, indecent, tortious, defamatory, knowingly false, misleading, deceptive, vulgar, obscene, offensive, scandalous, sexually explicit, profane, offensive or otherwise objectionable.

- 3.2.3. **Responding to negative remarks**

Do's	Don'ts
<p>1) Alert Superior</p> <ul style="list-style-type: none">➤ To inform the Superior about the remark received and to alert the Superior for the next course of action. <p>2) Do Not Take the Conversation to Private</p> <ul style="list-style-type: none">➤ Keep all the records of the reply. Good to get superior's acknowledgement in your reply.	<p>1) Lose Your Cool</p> <ul style="list-style-type: none">➤ Remember to keep your composure and professionalism while responding to negative comments from customers. <p>2) Do Not Personalize it</p> <ul style="list-style-type: none">➤ Remember that if you have done your best in your best conduct and the issues might not be coming from your side, it is not necessary to take it personally. <p>3) Ignore the Negative Remarks</p> <ul style="list-style-type: none">➤ It is our responsibility to ensure the negative remarks been acknowledged and to look for ways for improvement.

TOP GLOVE CORPORATION BHD

Sales & Marketing Code of Conduct

4. CODE OF ETHICS

4.1. Safeguarding Information

- 4.1.1. All Sales & Marketing employees are to understand the nature and classification of the information that they handle in all formats, including on paper, electronically in documents or in IT applications and systems.
- 4.1.2. It is the Company's policy that any information and personal data pertaining to the company and customers in any way whatsoever and which are not generally available to the public shall be safeguarded and treated with utmost confidence by all Sales & Marketing employees.
- 4.1.3. All Sales & Marketing employees are to only distribute or share the Company's or customer's information on a need-to-know basis, ensuring that only employees or others working for the Company, or authorized third parties, with a genuine business need, have access to the information.
- 4.1.4. All company and customer's information must not be shared or used by any Sales & Marketing employees whether directly or indirectly for their personal benefit.
- 4.1.5. As the Company is committed to responsible, ethical, and fair use of data, Sales & Marketing employees must safeguard all information and data in line with our values, applicable laws and with respect for privacy as a human right.
- 4.1.6. The collection, use and other processing of personal data and corporate information shall comply with privacy and information security laws and regulatory requirements.
- 4.1.7. All Sales & Marketing employees are to immediately report events that can impact the security of the Company's information, which includes clicking links or attachments in suspicious emails, inadvertently sharing confidential information with the wrong recipient or any other relevant events.

4.2. Anti-Bribery and Anti-Corruption Obligation

- 4.2.1. All Sales & Marketing employees shall not offer, give, solicit, or accept bribes from their customers 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.
- 4.2.2. All Sales & Marketing employees must be aware 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

TOP GLOVE CORPORATION BHD

Sales & Marketing Code of Conduct

business practice.

- 4.2.3. Prior to giving or accepting any business amenity or other gifts (in whatever form or value), all Sales & Marketing employees must reflect 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.
- 4.2.4. All Sales & Marketing employees shall adhere to the bribery and corruption regulations, including but limited to Section 16 and 17 (offering, giving, promising, and accepting bribes), Section 18 (deceiving Top Glove), and Section 23 (abuse of power) of the Malaysian Anti-Corruption Commission Act 2009 (hereinafter referred to as the “Act”).
- 4.2.5. All Sales & Marketing employees shall adhere to the Top Glove Anti-Bribery & Anti-Corruption (ABAC) Policy and any applicable laws and regulations including but not limited to Corporate Liability provision as stipulated in Section 17A of the Act.
- 4.2.6. All Sales & Marketing employees must declare all gifts offered and received to/from the customers/others to the Corporate Integrity via TG GIFTS Online Declaration platform: https://workflow.topglove.com:10443/jw/web/userview/IntegrityUnit/IntegrityUnit/_/welcome.

4.3. Environmental and Sustainable Business Practices

- 4.3.1. All Sales & Marketing employees shall conduct their daily activities in their workplace in ways that are environmentally responsible and in compliance with all applicable environmental laws and regulations.
- 4.3.2. All Sales & Marketing employees must think twice before printing – if it is necessary to print and to make sure that the document is printed on both sides to reduce paper consumption.
- 4.3.3. All Sales & Marketing employees are encouraged to recycle their wastepaper by shredding it before disposing it into recycle bins.
- 4.3.4. All Sales & Marketing employees should aggressively promote our biodegradable gloves to encourage the usage of our environmentally sustainable products among our customers.

4.4. No Dealing with Customer from Sanctioned Territories

- 4.4.1 All Sales & Marketing employees are strictly prohibited from engaging or conducting any business dealings with individual or entity who is:

TOP GLOVE CORPORATION BHD

Sales & Marketing Code of Conduct

- (i) located within or operating from the Crimea region, Cuba, Sudan, Iran, North Korea or Syria (the “Sanctioned Territories”); or
- (ii) on the list of Specially Designated Nationals (SDNs) maintained by the U.S. Treasury Department’s Office of Foreign Assets Control (OFAC); or
- (iii) otherwise, the subject or target of any economic or financial sanctions administered by any national or regional authority.

4.4.2. All Sales & Marketing employees are strictly prohibited from selling or distributing the Company’s products to individuals or entities that are covered by the categories (i), (ii) or (iii) as stated in Clause 4.4.1 above.

4.4.3 All Sales & Marketing employees must make sure customers are aware that they shall not sell or distribute the Company’s products to any Sanctioned Territories or individuals or entities that are covered by the categories (i), (ii) or (iii) as stated in Clause 4.4.1 above.

4.5. Anti-Competitive

4.5.1 All Sales & Marketing employees shall avoid and not to engage with any business or marketing conduct that is anti-competitive.

4.5.2 All Sales & Marketing employees must conduct in the best interest of the Company, independent from its competitors, customers, and suppliers and in compliance with the idea of a fair competition.

4.5.3 All Sales & Marketing employees must ensure that they offer to customers the Company’s products or services at the most favorable terms.

4.6. Ethical Interaction with Customers

4.6.1 All Sales & Marketing employees shall comply with all applicable laws and regulations related to advertising and promotion of the products or services. This includes regulations related to the healthcare and other related industry and products.

4.6.2 All Sales & Marketing employees shall respect the privacy of the customers by not disclosing any personal information of the customers without its prior consent and shall comply with all relevant data privacy laws.

TOP GLOVE CORPORATION BHD

Sales & Marketing Code of Conduct

- 4.6.3 All Sales & Marketing employees are compulsory to adhere to the duty of confidentiality in relation to the customer information and the provision of the security principle under the Personal Data Protection Act 2010 and Top Glove Code of Conduct.
- 4.6.4 All Sales & Marketing employees shall be transparent and avoid any conflicts of interest that could affect their objectivity or impartiality. This includes avoiding any form of relationships with the customers that could be perceived as influencing their judgement or decision making.
- 4.6.5 All Sales & Marketing employees shall always conduct in a professional manner and to avoid making any inappropriate or offensive comments, gestures, or actions.
- 4.6.6 All Sales & Marketing employees shall comply with all company policies related to sales and marketing activities when dealing with customers. This includes no gift policy, entertainment, etc.

5. PENALTIES

Any violation of the laws and Top Glove's Code of Conduct will result in disciplinary action, including and not limited to termination from employment and other legal remedies that the Company is entitled to claim from in law.

Acknowledgement

As the Company's Sales & Marketing Staff, we hereby acknowledge, agree and undertake to adhere to the Company Sales & Marketing Code of Conduct as set out herein.

Sales & Marketing Staff,

Name :
Position :
Date :