

CODE OF BUSINESS ETHICS FOR DIRECTORS, EMPLOYEES, AND STAKEHOLDERS

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Introduction

1.1. Purpose

This Code of Business Ethics has been designed in line with the Corporate Core Value of the Company of Courage, Accountable, Responsive, Engaged, and Simplicity (known as “CARES”).

It entails the principles and rules of business conduct for members of Theta Edge Berhad (“TEB”) and all of its subsidiaries (respectively referred to as the “Company”), including all its directors, employees, and all relevant stakeholder applicants who have an interest in business dealing with the Company in conducting their daily responsibility, duties and business operations of the Company which influence stakeholders and general public perceptions to the Company.

1.2. Scope

The Code of Business Ethics covers all essential areas that address the daily business deals, which require its director, employees, and all relevant stakeholders to act fairly and transparently in their business activities. There are areas in this code that depend on the existing Framework and Policies and guidelines of the Company, which requires further references to the respective policies and procedures for clarity.

While this Code is standalone, it shall also be read with other relevant policies and guidelines issued by the Company.

A. PERSONAL DATA PROTECTION ACT AND INFORMATION CONFIDENTIALITY

The Personal Data Protection Act 2010 (from now on referred to as the “Act”) regulates the processing of personal data in commercial transactions within the Company, and for personal data, notice the terms “personal data” and “processing” shall have the meaning prescribed in the Act.

1. The notice shall inform you that the Company may process your data.
2. The Company is committed to protecting your personal information's privacy and security and being transparent about how they collect and use that data in meeting their data protection obligations. The data will be:-
 - used lawfully, fairly, and transparently;
 - collected only for valid purposes and not be used in a way that is incompatible with those purposes;
 - accurate and amended on request;
 - held securely;
 - kept as long as necessary and for the purposes highlighted in the Notice
3. The Company may process your data, including any additional information that may be subsequently provided to the Company, for the contract of service or other agreement for your employment.
4. Personal Data may have been collected directly from the directors, employees, relevant stakeholders, third parties, and any publicly available Source-able.
5. In addition to the above, the personal data and the other information collected, including any information that is subsequently provided, may be used and processed by the Company for the following reasons: -
 - a. processing employment applications, including pre-employment checks;
 - b. for budget planning, paying, and reviewing salary, incentives, bonuses, and other benefits;
 - c. consideration for promotion, career development, training, secondment or transfer, performance monitoring, health, and safety administration security, and access control;

- d. monitoring compliance with our internal rules and policies and adherence to the Company's policies;
 - e. complying with the compliance and disclosure requirements of any governmental and quasi-governmental departments, agencies, regulatory and statutory bodies
 - f. for training to external outsourcing companies, event organizers, corporate trainers, professional development courses, or other educational purposes;
 - g. to maintain medical, leave, and other absence records (including any medical reports which are provided to the Company);
 - h. for work-related injury and illness reporting;
 - i. for auditing, internal investigations, compliance, risk management, conflict of interest reporting, and security processes;
 - j. monitor your use of our information and communication systems to ensure compliance with our IT and social media policies;
 - k. to ensure network and information security, including preventing unauthorized access to our computers and electronic communication systems;
 - l. for purposes of domestic inquiries and legal proceedings and matters; and
 - m. for any financial background or credit checking;
6. The Company does not process or disclose your Sensitive Personal Data, such as physical or mental health or condition, political opinions, religious beliefs, or other beliefs of a similar nature, the commission or alleged commission of any offense without directors, employees, and relevant stakeholder's explicit consent. However, in any use of a biometric clocking-in and clocking-out system by employees, the data is only used for time management purposes. The biometric information itself is held securely within the system. The processing of Sensitive Personal Data (if any) is done for equal opportunities monitoring and reporting. Employees are free to decide whether or not to provide such data, and there are no consequences for failing to do so.
7. Data held by the Company relating to employees and potential employees will be kept confidential, but the Company may provide such information to the following parties, whether within or outside Malaysia, for the purposes as set out in paragraph 5 above:-

- a. TEB, the parent company, subsidiaries, related and associated companies, or any majority-owned affiliates;
- b. any agent, contractor, service provider, professional adviser, or third party who provides administrative, telecommunications, human resources management, or administrative services (including but not limited to the performance of pre-employment or background checks, payroll administration, safety, and provision or administration of benefits entitled to by employees) or any other service to us;
- c. any other person under a duty of confidentiality to the Company which has undertaken to keep such information confidential;
- d. persons seeking employee references in respect of employees;
- e. any person to whom we are under an obligation to disclose the requirements of any law binding on the Company or under and the purposes of any guidelines or regulations issued by regulatory or other authorities with which we are expected to comply;
- f. any court and officer of the court;
- g. any healthcare professional or hospital;
- h. our auditors;
- i. our lawyers and compliance professionals;
- j. our banks; and
- k. our service providers and vendors.

8. For security reasons and to ensure that the data is not lost, used, or accessed in an unauthorized way, altered, or disclosed, the Company shall limit access to the personal information to third parties who have a specific need to performance of their duties. Access to personal information is restricted to individuals authorized by the Company to manage the data and treat it by the law.
9. Data owners may access and request for correction of their data and limit the processing of their data or make any inquiries or complaints by contacting the HR Department.
10. According to the Act, the Company may refuse to comply with the data owner's request for access or correction to their data. If the Company refuses to comply with such a request, the Company will inform the data owner of the Company's refusal and the reason for rejection.
11. The Company reserve the right to amend the Notice at any time and will ensure such amendments will be made available to the data owners.
12. Data Owner is responsible for ensuring the personal data provided to the Company is accurate, complete, not misleading, and kept up to date.
13. If the data provided to us with personal data or information about another person, they must first confirm that the data owner has appointed you to act on their behalf, including to consent for the processing of their data and to receive on their behalf of any data protection notices.
14. Any personal data supplied by the data owner will be retained by the Company as long as necessary for the fulfillment of the purposes set out in the Companies policies or as is required to satisfy any legal, regulatory, and accounting requirements. Employee information on employee files is usually held for the duration of employment and another seven years after the employment term.

The Personal Data Protection Act 2010 Consent Form is represented as **Form 4** in section 2 of this document.

B. OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION

The Company is committed to providing healthy, safe, and environmentally friendly operations but not limited to:

- a. providing safe and healthy working conditions for the prevention of injury, ill-health, pollution, and other specific commitments relevant to the Health, Safety, and Environment (HSE) Management System;
- b. Eliminating hazards and reducing HSE risks and environmental impacts by providing proper information, training, and education for employees and contractors and operating responsibly;
- c. Complying with applicable HSE compliance obligations, standards, and codes of practice; and
- d. Continually improving HSE performances and systems through regular checking, monitoring, inspection, and identification of occupational hazards and environmental aspects at workplace and project sites.

All employees are expected to contribute to ensuring their safety and the safety of others in the workplace, for example:

- a. Smoking is not permitted except in designated smoking areas within all premises and properties of the Company,
- b. Be safety-conscious at all times; and
- c. Employees appointed as part of the HSE Committee shall be actively involved and participate in the consultation and meeting conducted.

Please refer to the **Health, Safety, and Environmental Policy** for details.

C. ANTI-BRIBERY AND ADEQUACY POLICY

This policy provides adequate procedures to address anti-bribery and anti-corruption procedures in line with the Malaysian Anti-Corruption Commission Act 2009 that ensure the Company's commitment to observing the highest standards of ethical business conduct and practices by laws and regulations.

The Company is also committed to presenting accurate and factual information to guide the directors, management, shareholders, and other stakeholders in making an informed decision, including observing the need for regulatory compliance. The policy also provides directors and employees assurance of adherence to the adequacy principle under the Act while performing their duties.

Please refer to the **Anti-Bribery and Adequacy Policy** for details.

D. ANTI-MONEY LAUNDERING

The Company does not tolerate any form of money laundering activities. Money laundering is disguising the nature and source of the money connected with criminal activity so that it appears legitimate or its trustworthy source or owner cannot be identified. This can happen via a method of placement, layering, integration, or such.

Appropriate measures shall be implemented, including conducting checks and verifications necessary to prevent the Company's financial transactions from being used by others to launder money. Directors and employees are expected to be mindful of the risk of the Company's business being used for money laundering activities and to raise any suspicious transactions to the relevant department via the appropriate reporting channel (refer to **I. Reporting Misconduct**).

E. FAIR COMPETITION

By the Competition Act 2010, which prohibits anti-competitive agreements to preserve healthy market competition between enterprises, the Company expects its employees to compete fairly and ethically for all business opportunities to ensure market prosperity. Employees must compete fairly with customers, competitors, and suppliers with integrity and transparency. This shall include, but is not limited to:

- a. Maintain transparency in pricing, marketing, bidding, or tender;
- b. Always provide clear, straightforward, and undeceiving information, concealing or destroying documents to prevent unfair competition;
- c. Do not participate in any act of boycotting any customer, tenderer, or supplier without reasonable grounds;
- d. Avoid any activity that might unfairly limit competition and distortion of the free market; and
- e. Never discuss, make or appear to make improper agreements with, or conspire with, customers, competitors, and suppliers.

F. INTELLECTUAL PROPERTY

Intellectual Property Right (“IPR”) protects innovations or creativity arising from the organization's research and development (R&D) activities in the organization from being appropriated by others.

As a public-listed organization, the collection of IPR must become a set of intangible assets for commercial potential. Therefore, the registration of IPR shall be maintained by the Innovation & Centre of Excellence department in line with the **Intellectual Property Policy** of the Company.

The employees of the Company shall be aware that:

- a. The ownership and retention of research data and information generated during employment are fully vested in the Company; and
- b. Upon leaving the Company, a former employee or director has a continuing obligation to maintain the confidentiality of such information, which includes intellectual property that may have been created while under the employment and service of the Company.

G. BUSINESS CODE OF CONDUCT

All directors and employees shall observe and abide by the following:

1. To be punctual when dealing, attending, and carrying out their duties with or for the Company
2. To perform duties with utmost commitment and diligence at all times and to accept responsibilities as assigned by the Company from time to time.
3. To comply with all procedures and policies of the Company and faithfully observe all rules, regulations, practices, directions, and goals of the Company, whether expressed or implied.
4. Internet usage, telephone, and corporate email. These facilities are provided for work-related only and must be used for work-related only.
5. To comply with all company health, safety, and environmental procedures to ensure maximum safety and comfort for employees and customers.
6. To avoid conflict of interest by not getting involved directly or indirectly in any business or occupation whatsoever, whether as principal agent, broker, shareholder, or otherwise, or to engage in activities that would be detrimental, whether directly or indirectly, to the Company's interests.
7. Ensure any act or conduct does not cause any damage to the Company, its property, or its reputation.
8. To always maintain principles of confidentiality, not to disclose directly or indirectly to any person or corporation knowledge or information which may have been acquired during employment with the Company.
9. To ensure completeness and relevance, update personal records from time to time.

10. To classify personal records and remuneration as confidential information and should not be disclosed to others.
11. To uphold principles of integrity at all times, including practicing good Corporate Governance Practices during performing duties and tasks for the Company.
12. Employees are generally prohibited from making a public statement, both privately and officially, on behalf of the Company. Any general comments shall only be made by the relevant personnel/ department as authorized by the Company.
13. To be free from alcohol or drug influence while performing their duties.

All relevant stakeholders shall:

1. Provide an honest and accurate representation of their organization, experiences, and capabilities for technical and financial competencies assessment.
2. Shall declare any potential or actual conflicts of interest to the Company, even if it happens after the appointment, and immediately address the dispute as soon as it is known.
3. Shall conduct all procurement and business relationships with honesty, integrity, respect, and fair manner and in compliance with the No Gift Policy and any other applicable policies of the Company.
4. Maintain full responsibility for services rendered/goods supplied, honor their commitments on a timely basis, and follow their obligations under the specific agreements and undertakings with the Company.
5. Must not make any false representations in connection with any transactions, including misrepresentations of fact (whether written or oral), use of false documentation such as fraudulent or forged contracts, or other false or inaccurate records.
6. Must maintain complete and accurate books and records relating to all transactions with the Company, together with supporting documentation, following applicable accounting principles, laws, taxations, and regulations.
7. To report any form of improper conduct, wrongdoings, bribery, corruption, fraud, and abuse by any Director or Employee via the appropriate reporting email address whistleblowing@theta-edge.com.

The extraction of the **Code of Conduct for Employees and Stakeholders** of the Company is available in Section 3 of this document. It is represented as Appendix 1 and Appendix 2, respectively, and will be made available on the website of the Company.

H. DECLARATION OF INTEREST AND ASSET

In ensuring the Company is practicing the intended Code of Business Ethics and adopting the “CARES” culture, directors and employees of the Company are required to provide at all instances to avoid a situation that may compromise its due care and the best interest of the Company. As such, all directors and employees must make a Conflict of Interest and asset declaration which is considered a tool to combat corruption and address conflict of interest in business dealing with the Company.

Conflict of Interest is a situation in which directors and employees of the Company cannot act entirely in the company’s best interest because of their claim that interferes with the interests of the Company. Should a conflict of interest arise and be observed, directors and employees are required to immediately make their declarations to the Company to ensure compliance with all applicable and relevant policies and guidelines of the Company and to abstain themselves (the relevant directors and employees) from voting or making any business decision on the subject matters.

Asset Declaration would enable the Company to reasonably assess possible unjustified assets owned by the directors and employees. As this is a tool for combating bribery and corruption, the data collection will be established on an ad-hoc basis upon request by the Company arising from whistle-blower activities and routine assurance on a case-to-case basis to facilitate any internal investigation activities. This declaration is a tool to ensure that the directors and employees maintain reasonable asset ownership before, during, and before the termination of engagement with the Company.

Due to the sensitivity of the information, the information-keeping responsibility is on the Human Capital Lead. This ensures restrictive access to the information and minimizes the potential for a leak of information.

The Conflict of Interest and Asset Declaration Form is represented as **Forms 2** and **3** in section 2 of this document.

I. REPORTING MISCONDUCT

All directors, employees of the Company, and its relevant stakeholders were encouraged to report any wrongdoing, corrupt practice, unethical behavior, and about to commit criminal activity by any directors and employees of the Company that may adversely impact the Company.

A robust framework for whistleblowing and reporting for any form of improper conduct, wrongdoings, bribery, corruption, fraud, and abuse by any directors or employees, as well as relevant stakeholders, is put in place to allow such acts to be reported via an appropriate channel, while protecting the identity of the person, to prevent and uncover such acts.

The Company will comply with all the relevant laws to protect the whistle-blower's interest.

Please refer to the **Whistle-blower Policy** for further details.

J. DEALING WITH SUPPLIERS, PARTNERS, AND CUSTOMERS

Directors and employees of the Company must uphold honesty in their work and duties when dealing with suppliers, partners, and customers. Any ambiguities in any aspect of dealings or transactions shall be referred to relevant policies and guidelines of the Company.

Directors and employees should also maintain a direct and clear-cut relationship with suppliers and business partners and abide by all reasonable contractual agreements and obligations. The Company expects compliance with its standard of integrity and will not tolerate directors and employees who achieve results through unethical business conduct.

I. Suppliers and Partners

When dealing with suppliers and partners, the relevant employees must adhere to the Company's Standard Operating Procedure/s and policies. This will promote a fair business deal and encourage competition between suppliers and partners to strike a business deal with the Company. It also allows the Company to have an opportunity to broaden the supplier's options and enhance its purchasing power. The SOP includes but is not limited to the following:

- a. Each stage or level of dealing with suppliers shall comply with the applicable policies and guidelines of the Company; and
- b. Use of purchasing power somewhat and make payments on time.

The Company has established a selected vendor database that has been verified under the Vendor Development Programme to support business operation and service delivery. These vendors have been selected based on criteria and assessments such as price, delivery, volume, product specification, and technical know-how. This would allow the Company to be more agile and substantially reduce its time constraint in making decisions for suppliers and partners for their appointment and engagement.

Please refer to **Strategic Procurement Department Standard Operation Procedures** for further details.

II. Customers

As a solutioning provider in technology and innovation products, the Company needs to be recognized and trusted by our customers for service delivery excellence. The Company is committed never to compromising the quality of our products and services. The employees of the Company shall:

- a) Maintain the integrity of our services throughout the business dealings (including tender and bidding process, agreement on Letter of Award, delivery of agreed products and services)
- b) Ensuring quality of the product and service delivery following the agreed specification and on-time project deliverables
- c) Ensure that all customer queries and complaints concerning the product (hardware and software) and services (support and maintenance) are acted upon professionally, quickly, and politely.
- d) Maintaining a good customer relationship with all customers that is consistent with the policies of the Company

Please refer to **Customer Relationship Management Policy** for details.

K. HANDLING GIFT, ENTERTAINMENT, AND HOSPITALITY

To protect against any undue obligations of/or influence on the employees to external parties, the employee shall declare to the Company any gifts offered and surrendered to Organization Resilience Function for record and redistribution following applicable policies and guidelines.

Entertainment is a legitimate way of building good business relationships with the External Party; relevant employees can entertain the external party through reasonable acts as part of the business networking exempted under the policy.

The hospitality given and received by employees who interact with external parties should be related to the business meeting and networking purposes between both parties.

Please refer to the **No Gift Policy** for details, including its exemptions.

L. CORPORATE SOCIAL RESPONSIBILITY (CSR)

The Company intends to become an innovator that is socially responsible to itself, its stakeholders, and the general public via CSR initiatives and the adoption of ESG best practices in their day-to-day operations and business activities. To uphold this intention, Theta Cares has been set up as an initiative to contribute to societal goals of a philanthropic, activist, or charitable nature by engaging in or supporting volunteering or ethically oriented practices. Through Theta Cares, CARESquad has been established whereby employees of the Company can personally volunteer to participate in any charitable event held by the Company. The employees of the Company are expected to but not limited to:

- a. Complete the minimum volunteering hours as part of the Key Performance Indicator
- b. Provide supporting documentation to the relevant department/s for volunteering activity carried out externally (not bearing the Company's name) for verification purposes

Please refer to the **Corporate Social Responsibility Policy** for further details.

M. CORPORATE COMMUNICATION AND CRISIS MANAGEMENT COMMUNICATION PLAN

I. Confidential Information

Directors and employees of the Company who have access to any confidential information which belongs to the Company are responsible for ensuring that all such personal data is secured.

Confidential information consists of but is not limited to policy documents that are not disclosed to third parties and the public, business, marketing, trade secret, financial, technical, design, engineering, database, records, reports, agreements, files, computer software, payroll information, licenses, emails, or other data.

Directors and employees are prohibited from transferring, disseminating, or disclosing confidential information to unrelated parties during or after the termination of service, unless the Company permits such disclosure or such information is required by law and the courts.

Directors and employees who violate this principle are subject to disciplinary action.

II. Making Public Statements

Employees are generally prohibited from making a public statement, both privately and officially, on behalf of the Company. Any general comments shall only be made by the relevant personnel/ department as authorized by the Company. This exception is conditional upon the information being made in the interest of the Compa. It shall not be one that will be detrimental to the reputation and performance of the Company.

III. Crisis Management Communication Plan

A crisis management communication plan ensures the Company has a proper set of guidelines when communicating an emergency or unexpected event to the employees, partners, suppliers, customers, media, the general public, and other valuable stakeholders.

In ensuring that consistent messages and information are being delivered during a crisis, only the relevant personnel/ departments authorized by the Company are allowed to communicate on behalf of the Company.

Please refer to **Crisis Communication Guidelines** for further details.

N. REPORTING RISK

Enterprise Risk Management would allow the Company to monitor a Corporate Risk level and perform mitigating action to manage the risk. The enterprise risk management framework of the Company provides a systematic approach to identifying, measuring, mitigating, and treating the risk faced by all functions and subsidiaries of the Company every month.

The identified risk will be consolidated and reported to the Management, Board Audit Risk and Management Committee, and the Board of Directors of Theta Edge Berhad every quarter. This will allow the Company to ensure that risk-based decision-making is part of the business culture that promotes and enhance risk management enforcement within the Company.

However, as the business operates in a dynamic business environment, the Company also encourages ad-hoc risk reporting, whereby risk that requires immediate attention from the top management to imported immediately to ensure an appropriate mitigation plan is implemented to address the risk based on its materiality. The materiality is based on risk appetite and tolerable level that can be accepted by the Company but not limited to the time-sensitivity and financial impact. As such, each employee is responsible for ensuring all risks have been identified and not limited to:

- a. Being aware of risk reporting category and criteria assessed in the Company;
- b. Understand the matrixes, risk appetite, and risk tolerance of the Company;
- c. Reporting risk following the risk governance structure and model.

In addition, all employees are expected to actively assess, manage and minimize the risk impacts in our business operations and ensure that the overall corporate and business objectives are attainable.

Please refer to **Enterprise Risk Management Framework** and **Corporate ESG and Sustainability Reporting Framework** for further details.

1.3. Objective

The objective of this Policy is to set clear principles in upholding the highest standards of ethical practices and integrity in carrying out the affairs and businesses of the Company.

1.4. Distribution/Target Audience

The policy applies to all directors, employees, and all relevant stakeholders in business dealings with and on behalf of the Company.

1.5. Review and Improvement

The policy shall be reviewed every three (3) years and timely, subject to the regulation and law when those changes are necessary to be adopted and operationalized under this policy. Any changes in the prevailing laws that impact the framework shall apply to the policy on its application date. The Company's Document Control Policy (DCP) shall govern all changes and amendments to the framework.

1.6. Abbreviations

CARES	Courage, Accountable, Responsive, Engaged, and Simplicity
CSR	Corporate Social Responsibility
HSE	Health, Safety, and Environment
TEB	Theta Edge Berhad

2. Records

Description of Records	Form Number	Responsibility
Code of Business Ethics Declaration Form	Form 1	Individual Employee/ Relevant Stakeholders
Conflict of Interest Disclosure Form	Form 2	Individual Employee/ Relevant Stakeholders
Asset Declaration Form	Form 3	Individual Employee
Personal Data Protection Act 2010 Consent Form	Form 4	Individual Employee/ Relevant Stakeholders

Form 1



Theta Edge Berhad

Code of Business Ethics Declaration Form

(Year _____)

Name : _____
 Company : _____
 Position : _____
 Staff ID No : _____
 Date : _____

I, at this moment, declare that I am not involved in nor contribute to any outside agencies or activism that contradicts my official duties as an employee.

I am well aware of the prohibition concerning the receipt of gifts from any business entity that is, directly and indirectly, engaging in any deal with me, and I confirm that I have never violated the prohibition that was set in the Theta Edge Berhad Group of Companies' No Gift Policy.

I now certify that the information above is accurate and complete. I have reviewed, and agree to abide by, the Code of Business Ethics of Theta Edge Berhad Group of Companies that is currently in effect.

Signature : _____
 I/C No. : _____

For Office Use*

The Theta Edge Berhad Code of Ethics Declaration Form has been filled and submitted to the Head of Organization Resilience.

Signature : _____
 Name : _____
 Date : _____

Form 2



Theta Edge Berhad

Conflict of Interest Disclosure Form (Year _____)

Name : _____
Company : _____
Position : _____
Staff ID No : _____
Date : _____

Please describe below any relationship, position, or circumstances in which you are involved that you believe could contribute to a Conflict of Interest (as defined in Theta Edge Berhad's Policy on Conflict of Interest) arising.

NO	COMPANY	NATURE OF BUSINESS	POSITION	SHAREHOLDINGS (%)		REMARKS
				DIRECT	INDIRECT*	
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						

*Shareholdings via another entity(ies) or person(s) or connected/related person(s)¹

I now certify that the information above is accurate and complete. I have reviewed, and agree to abide by, the Policy of Conflict of Interest of Theta Edge Berhad that is currently in effect.

Signature : _____
I/C No. : _____

¹ Related person herewith is defined as parent(s), sibling(s), spouse(s) and children

Form 3



Theta Edge Berhad

Asset Declaration Form

(Year _____)

The Company is committed to observing the highest standards of ethical business conduct and practices, following laws and regulations overseen by the Malaysian Anti-Corruption Commission (MACC). One of the initiatives in implementing the Corporate Integrity System Malaysia (CISM) by the MACC is via Asset Declaration. It is a tool in combating corruption strongly encouraged by the MACC in combating bribery.

(A) PERSONAL INFORMATION (MAKLUMAT PERIBADI)

(i) Staff (Kakitangan)

Name (*Nama*) : _____
 Company (*Syarikat*) : _____
 Position (*Jawatan*) : _____
 Staff ID No (*No ID Kakitangan*) : _____
 Date (*Tarikh*) : _____

(ii) Spouse (Pasangan)

Name (*Nama*) : _____
 IC No (*No Kad Pengenalan*) : _____
 Company (*Syarikat*) : _____
 Position (*Jawatan*) : _____

(B) INCOME DECLARATION (PENGISYTIHARAN PENDAPATAN)

(i) Summary (Ringkasan)

	Personal (<i>Persendirian</i>) (RM)	Spouse (<i>Pasangan</i>) (RM)
Gross Income (<i>Gaji Kasar</i>)		
Fixed Allowance (<i>Elaun Tetap</i>)		
Rental (<i>Sewaan</i>) **		
Share/Dividend (<i>Saham/Dividend</i>)**		
Others (<i>Lain-Lain</i>)		
Total		

** Please provide further information in the table below (Sila berikan maklumat lanjut dalam jadual di bawah)

(ii) Rental Information – Residential/ Commercial (*Maklumat Sewaan – Kediaman/ Kedai*)

Address (<i>Alamat</i>)	Amount (<i>Nilai</i>) (RM)
1.	

2.	
3.	
Jumlah	

(iii) Rental Information – Residential/ Commercial (Maklumat Sewaan – Kediaman/ Kedai)

Company and Certificate No (Syarikat dan No Sijil)	Amount (Nilai) (RM)
1.	
2.	
3.	
Jumlah	

(C) LIABILITY/ MONTHLY INSTALLMENT DEBT/LOAN (TANGGUGAN/ANSURAN BULANAN ATAS HUTANG/ PINJAMAN)

	Personal/Joint (Peribadi/Bersama)	Total Loan (Jumlah Pinjaman) (RM)	Monthly Installment (Ansuran Bulanan) (RM)
Housing Loan (Pinjaman Perumahan)			
Vehicle Loan (Pinjaman Kenderaan)			
Personal Loan (Pinjaman Peribadi)			
Study Loan (Pinjaman Pelajaran)			
Others (Lain-Lain)			

(D) ASSET DECLARATION (DEKLARASI HARTA)

1. Land and Properties – Residential and Commercial (*Tanah, dan Bangunan – Kediaman dan Komersial*)
2. Cash Deposit (*Deposit/ Simpanan Tunai*)
3. Motor Vehicle (*Kenderaan motor*)
4. Share including debenture, bond, trust unit and other securities (*Saham termasuk debentur, bon, unit amanah dan sekuriti lain*)
5. License and Permit, including Trade, Business and Commercial (*Lesen dan Permit termasuk Perdagangan, Perniagaan dan Komersial*)
6. Any other asset (eg: club membership, home furnishing, sporting goods) of which the purchase price of each exceed 6 months pay or RM50,000 whichever lower (*Apa-apa asset lain (cth: keahlian kelab, perabot rumah, alatan sukan) dengan harga belian setiap satu melebihi 6 bulan gaji atau RM50,000 mana yang lebih rendah*)

Asset Harta	Detail of Asset – Lot No, Certificate No, Address, Acquisition Method (Gift, Heirloom, etc.) Butiran Harta – No Lot, No Sijil, Alamat, Cara Perolehan (Hadiah, Pusaka, dll)	Date and Value of Ownership Tarikh dan Nilai Perolehan (RM)	Personal <i>Persendirian</i> (RM)	Spouse <i>Pasangan</i> (RM)

Form 4



Theta Edge Berhad

Personal Data Protection Act 2010 Consent Form

(Year _____)

Name (Nama) : _____
Entity : _____
Position : _____
Staff ID No : _____
Date : _____

I now declare that I have read and understood this Notice to Employees and Potential Employees according to the Personal Data Protection Act 2010.

I, at this moment, consent to the collection and processing of my Personal Data and Sensitive Personal Data as defined under the Personal Data Protection Act 2010 ("PDPA") following the requirements under the Notice for all relating to my employment with Theta Edge Berhad as explained in the Notice.

Signature : _____
I/C No. : _____

3. Appendix

Appendix 1: Employees Code of Conduct



Theta Edge Berhad Employees' Code of Conduct

All directors and employees shall observe and abide by the following:

1. To be punctual when dealing, attending, and carrying out their duties with or for the Company
2. To perform duties with utmost commitment and diligence at all times and to accept responsibilities as assigned by the Company from time to time.
3. To comply with all procedures and policies of the Company and faithfully observe all rules, regulations, practices, directions, and goals of the Company, whether expressed or implied.
4. Internet usage, telephone, and corporate email. These facilities are provided for work-related only and must be used for work-related only.
5. To comply with all company health, safety, and environmental procedures to ensure maximum safety and comfort for employees and customers.
6. To avoid conflict of interest by not getting involved directly or indirectly in any business or occupation whatsoever, whether as principal agent, broker, shareholder, or otherwise, or to engage in activities that would be detrimental, whether directly or indirectly, to the Company's interests.
7. Ensure any act or conduct does not cause any damage to the Company, its property, or its reputation.
8. To always maintain principles of confidentiality, not to disclose either directly or indirectly to any person or corporation knowledge or information which may have been acquired during employment with the Company.
9. To ensure completeness and relevance, update personal records from time to time.
10. To classify personal records and remuneration as confidential information and should not be disclosed to others.
11. To uphold principles of integrity at all times, including practicing good Corporate Governance Practices during performing duties and tasks for the Company.
12. Employees are generally prohibited from making a public statement, both privately and officially, on behalf of the Company. Any general comments shall only be made by the relevant personnel/ department as authorized by the Company.
13. To be free from alcohol and drug influence while performing their duties

Appendix 2: Stakeholder Code of Conduct



Theta Edge Berhad Stakeholder Code of Conduct

All relevant stakeholders shall:

1. Provide an honest and accurate representation of their organization, experiences, and capabilities for technical and financial competencies assessment.
2. Shall declare any potential or actual conflicts of interest to the Company, even if it happens after the appointment, and immediately address the dispute as soon as it is known.
3. Shall conduct all procurement and business relationships with honesty, integrity, respect, and fair manner and in compliance with the No Gift Policy and any other applicable policies of the Company.
4. Maintain full responsibility for services rendered/goods supplied, honor their commitments on a timely basis, and follow their obligations under the specific agreements and undertakings with the Company.
5. Must not make any false representations in connection with any transactions, including misrepresentations of fact (whether written or oral), use of false documentation such as fraudulent or forged contracts, or other false or inaccurate records.
6. Must maintain complete and accurate books and records relating to all transactions with the Company, together with supporting documentation, by applicable accounting principles, laws, taxations, and regulations.
7. To report any form of improper conduct, wrongdoings, bribery, corruption, fraud, and abuse by any Director or Employee via the appropriate reporting email address whistleblowing@theta-edge.com.