



Code of Conduct

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Introduction

- Turbo-Mech Berhad (“the Company” or “TURBO-MECH”) is a publicly listed company engaged in the supply and servicing of mechanical, electrical, instrument and other related equipment used in the oil & gas industry located at all the oil countries in South-East Asia. The Company employs best practices in the performance and delivery of its services. It is dedicated to maintaining leadership in enterprise management and contributing to the betterment of the society.
- As a Company committed to ethical practices, TURBO-MECH provides a Code of Conduct for all of its employees in Malaysia, Singapore and overseas, including those working in its subsidiary companies.

Building an Ethical Culture

- An ethical culture is built on a set of ingrained values and beliefs shared by every staff member working within the Company. It involves a common understanding of what is right and wrong in the course of business dealings and outlines the methods of resolving ethical problems encountered in the workplace.
- If compliance with regulatory requirements and observance of high ethical standards become a state of mind for staff at all levels, regulatory issues will be automatically addressed whenever they arise. As such, an ethical culture forms the basis for staff in making business decisions. It also enhances profitability, secures the trust and loyalty of stakeholders, improves operational efficiency and promotes a sense of mutual trust amongst staff members.
- The values and attitudes held by management exert the single greatest influence on the Company's overall culture. If management behaves in an unethical manner or turns a blind eye to unethical practices, employees are likely to behave in the same way based on the simple perception that this is the way business is conducted. Therefore, management should encourage an ethical culture within the Company by being a role model in consistently upholding ethical principles and demonstrating ethical behaviour.
- In order to maintain an ethical culture at TURBO-MECH, we expect compliance with our standards of integrity throughout the Company. The responsibility for compliance falls not only on management but on the entire Company, from the supervisory ranks to operational levels.

Conflict of Interest

- A 'conflict of interest' occurs when an individual's private interest interferes or appears to interfere with the interests of the Company. Anything that would present a conflict of interest for a director or employee would likely also present a conflict of interest if it is related to a member of his or her family.
- Conflicts of interest are prohibited as a matter of Company policy, unless they have been approved by senior management. Service to the Company should never be subordinated to personal gain or advantage.
- Directors and employees are required to avoid conflicts of interests wherever possible. Any director or employee, who is aware of any conflict of interest, or any material transaction or relationship that could reasonably be expected to give rise to a conflict of interest, is required to disclose the matter to the senior management immediately.
- Directors and employees shall at all times ensure that their dealings with customers, suppliers, contractors and colleagues do not place them in a position of obligation that may lead to conflicts of interest.
- Employees shall not take up concurrent employment, either on a regular or consultant basis, without prior written consent from the senior management.
- Directors and employees are not allowed at any time to disclose any proprietary information to party outside the Company without prior permission. Such information may relate to all aspects of the Company's operations
- Directors and employees who have access to or are in control of proprietary information must at all times provide adequate safeguards to prevent its abuse or misuse.
- Directors and employees or their immediate family members shall not grant or guarantee a loan to, or accept a loan from or through the assistance of any individual or organisation having business dealings with the Company.
- In cases where a director or employee or his or her immediate family might have engaged or considered engaging in business, investments or activities that might present an existing or perceived conflict, it is the responsibility of the individual or employee to make full disclosure in writing for approval by the senior management.
- Appropriation without authorisation of the Company's property is a crime of theft leading to dismissal and / or prosecution of the director or employee concerned. Any infringement of



the Company's intellectual property rights shall not be tolerated, and appropriate enforcement action will be instigated against the infringer.

- Directors and employees are advised not to engage in frequent or excessive gambling of any kind with persons having business dealings with the Company, such as customers, suppliers and contractors, as well as colleagues, particularly subordinates. Gambling of any form on the Company's premises is strictly forbidden.

Responsibilities to Shareholders

- The Company endeavours to maximise shareholder return and maintain its high credit standing through prudent management of its business and financial affairs.
- The Company respects investors' right to information that is necessary for evaluating their investments in the Company. Such information shall be provided to the investment community as stipulated by relevant statutory and regulatory authorities. Directors and employees are required to be familiar and comply with the Company's applicable disclosure controls and procedures, including release of the Company's public reports and documents. Following this principle, each director and employee having direct or supervisory authority regarding the Company's public communications of its general business, results, financial condition and prospects should, to the extent appropriate within his or her area of responsibility, consult with other Company officers and employees and take other appropriate steps regarding these disclosures with the goal of making proper, fair, accurate, timely and understandable disclosure.
- It is the policy of the Company to maintain complete and accurate records and accounts. All accounting records and reports shall be kept and presented in compliance with all applicable laws and professional accounting standards.
- The account books of the Company shall, in reasonable and accurate detail, reflect the transactions in and disposition of the Company's assets.
- It is the unequivocal position of the Company that no false, artificial or misleading statements or entries shall be made in the Company's books, accounts, records, documents or financial statements.

Relationship with Employees

- The dignity of each employee shall be respected, and the confidentiality of employee records shall be safeguarded.
- The Company is responsible for equipping staff with the requisite skills for handling their respective jobs. The Company shall continuously endeavour to improve its services and set service targets for every employee to meet and even exceed the goals. The Company aims to provide opportunities to train, develop, motivate and empower all staff so that they may fully utilise their talents. The Company encourages and supports the attainment of further knowledge and relevant qualifications through training and self-learning
- It is the Company's strategy to attract, retain and motivate people of high calibre and develop their potential so that all employees are competent, committed and feel that they are valued members of a successful Company. The Company shall reward employees on their performance and contributions.

Health and Safety

- The Company is committed to ensuring the health, safety and welfare of its employees. The Company shall comply with all occupational health and safety legislations and provide all employees with a safe working environment.
- Safety of customers, the public, contractors and employees is an absolute pre-requisite. The Company is committed to consistently meeting statutory requirements, maintaining a safety-first culture, and employing relevant management systems for achieving its corporate safety goals in all aspects of the business.
- Safety is the responsibility and duty of everyone and should be foremost at all times in everything we do. Safety management is the responsibility of each director, manager and supervisor, and all employees.



Summary of Ethics Questions to Consider

- Is against the Company's standards?
- Does it feel right?
- Is it legal?
- Will it reflect negatively on you or the Company?
- Who else could be affected by this?
- Would you be embarrassed if others knew you took this course of action?
- Is there alternative action that does not pose an ethical conflict?
- How would it look on the newspaper?
- What would a reasonable person think?
- Can you sleep at night?



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