

THRIVEN GLOBAL BERHAD

(Company No. 182350-H)

CORPORATE CODE OF CONDUCT

1. INTRODUCTION

Our Corporate Code of Conduct ("the Code") forms an integral part of our corporate governance framework and is part of our commitment to observe and adhere to high standards of corporate responsibility and conduct ourselves rightly.

2. OBJECTIVES

The Code is intended to provide guidance for directors, senior executives and other employees regarding the standards we expect in the conduct of our business. The Code also guides us to operate at high standards of business integrity, to comply with the relevant laws and regulations and to ensure that the Code is never compromised for the sake of results.

3. OUR CONDUCT

- **We must act honestly and in good faith**

All employees and officers have a duty of care and diligence in fulfilling the powers and functions of their roles. No employee or officer should engage in conduct that is likely to bring discredit upon Thriven Global Berhad and its subsidiaries ("Thriven Group").

- **We must not disclose confidential information**

In the normal course of our employment at Thriven Group, we may learn confidential information about Thriven Group and/or whom it does business with. We must not use or disclose this confidential information to any party unless authorised to do so.

- **We must make proper use of company assets**

Company assets are specifically provided to employees and officers for use in the course of their work. Prior authorisation must be obtained before any asset is used outside the scope of an employee's course of work.

- **Health, safety and environment implications must be regarded before making any business decision**

We must ensure that our business decisions do not compromise our commitment, to avoid any injury to people or damage to the environment and ensuring we comply at all times with the appropriate laws.

- **We must avoid conflict of interests**

In instances where our personal interests conflict with those of Thriven Group, we must remove or manage the conflict so as to avoid loss to Thriven Group or Thriven Group's customers. Circumstances would include but not be limited to, the receipt of secret commissions or other payments not directly from Thriven Group.

- **We must understand how company policies and procedures relate to our work**

All employees and officers must be aware of company policies and procedures, and how the policies relates directly to their work. This includes a working knowledge of the company and divisional delegations of authority, to ensure no employee exceeds their respective limits in committing Thriven Group verbally or in writing.

- **We must comply with all laws and regulations**

Thriven Group takes seriously its obligations as a company to comply with all relevant laws and regulations affecting its business. All employees and officers of Thriven Group are expected to comply at all times with all laws and regulations relevant to their functions and tasks within the organisation.

Employees and officers should report any breaches of relevant laws or regulations to the Company Secretary for further action.

Thriven Group had in February 2016 adopted a new Employee Handbook which includes the Employee's Code of Conduct and Whistle-blowing Policy. The Whistle-blowing Policy is intended to provide protection for staff who raise concerns in relation to irregular and unlawful practices

- **We promote and maintain a culture of lawful and ethical behavior**

Thriven Group encourages all employees and officers to report promptly in good faith, any violations or suspected violations of the Code.

4. CONSEQUENCES OF BREACHING THE CODE

Any employee or officer who breaches the Code will face disciplinary action which, depending on the severity of the breach, could result in a dismissal or a legal action being initiated against the person, or both.