



CODE OF CONDUCT AND ETHICS POLICY

1. PURPOSE

Tri-Star Industries is committed to conducting business with the highest standards of ethics, professionalism, and integrity.

In alignment with international best practices, TSI is also committed to responsible Environmental, Social, and Governance (ESG) practices. We aim to operate sustainably, contribute positively to society, and uphold strong governance structures to protect the interests of all stakeholders.

2. SCOPE

This policy applies to:

- All employees, officers, directors, and contractors of TSI Group, regardless of location.
- All third parties acting on behalf of TSI, including vendors, consultants, and business partners.

Compliance with this policy is mandatory. Non-compliance may result in disciplinary action, up to and including termination of employment, and may be reported to legal or regulatory authorities when appropriate.

3. POLICY PRINCIPLES

3.1 Ethical Conduct

TSI employees and representatives are expected to uphold the following principles:

3.1.1 Compliance and Good Faith: Adhere to all applicable laws, regulations, and social norms in every jurisdiction where TSI operates. Act in good faith, ethically, and in a manner that earns trust and customer satisfaction.

3.1.2 Respect for Individuals: Treat all employees with dignity, respecting individual rights, privacy, and diversity. Foster a safe, inclusive, and supportive workplace.

3.1.3 Corporate Citizenship: Contribute positively to society and local communities. Avoid collusion, corruption, and unfair practices.



3.1.4 Transparency: Maintain open and honest communication with stakeholders while safeguarding confidential information.

3.1.5 Environmental Stewardship: Promote environmentally sustainable practices and reduce the environmental impact of business operations.

3.1.6 Protection of Personal Data: Handle personal data responsibly and protect the privacy of employees, customers, and stakeholders.

3.1.7 Whistleblower Protection: Encourage reporting of ethical or legal violations through protected channels without fear of retaliation.

3.1.8 Continuous Improvement: Commit to ongoing improvement of ethical practices through training, audits, and employee engagement.

3.2 Relationship with Society

3.2.1 Legal and Ethical Compliance: Comply with all relevant laws and regulations, including their ethical intent, and prepare for future legal developments.

3.2.2 Rejection of Antisocial Forces: Maintain a zero-tolerance stance against criminal organizations or antisocial entities. Reject all improper demands and refuse financial settlements with such groups.

3.2.3 Trade Controls: Prevent illegal trade practices, ensure proper import/export compliance, and support international peace and security.

3.2.4 Public Engagement: Support socially beneficial initiatives, including cultural, educational, and economic programs promoted by government and civil society.

3.3 Relationship with Customers, Partners, and Competitors

3.3.1 Product Safety and Quality: Comply with safety and quality standards at all stages of the product lifecycle and proactively improve product excellence.

3.3.2 Fair Competition: Comply with antitrust and fair competition laws in all markets where TSI operates.



3.3.3 Supplier Relations: Select and engage suppliers fairly, based on objective criteria (e.g. quality, delivery, cost, ethics, environmental responsibility). Avoid misuse of market position.

3.3.4 Confidentiality: Lawfully acquire third-party confidential information and protect it against unauthorised disclosure or misuse.

3.3.5 Gifts and Entertainment: Avoid giving or receiving gifts, entertainment, or favours that may unduly influence business decisions or create conflicts of interest.

3.4 Relationship with Employees

3.4.1 Respect and Non-Discrimination: Uphold human rights, prevent harassment, and prohibit discrimination based on race, religion, gender, age, disability, nationality, or other protected characteristics.

3.4.2 Health and Safety: Maintain a healthy and safe workplace, comply with occupational safety laws, and promptly respond to any workplace accidents or hazards.

3.4.3 Labour Compliance: Follow local labour laws and promote a balanced work-life environment. Managers should monitor workloads to prevent overwork; employees must take responsibility for their own well-being.

3.5 Relationship with the Company and Its Assets

3.5.1 Ethical Conduct: Maintain high ethical standards and conduct business responsibly as members of society.

3.5.2 Financial Integrity: Ensure accurate financial reporting in line with accounting standards and internal controls. Comply with all tax regulations.

3.5.3 Prohibited Activities on Company Premises: Do not engage in political, religious, or ideological activities without prior internal approval.

3.5.4 Confidentiality of Internal Information: Do not disclose proprietary, technical, or trade secret information without authorisation.

3.5.5 Asset Protection: Use company assets (physical, digital, and financial) responsibly, protect them from misuse, and ensure efficient use.



TRI-STAR

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3.5.6 Intellectual Property: Respect third-party intellectual property and protect TSI's own IP through lawful and strategic use.

3.5.7 Compliance and Reporting: Promptly report any suspected misconduct or violations. TSI will ensure whistleblowers are protected and all reports are handled confidentially and fairly.

4. POLICY ADMINISTRATION AND UPDATES

This policy is reviewed regularly and updated in accordance with evolving business practices, legal requirements, and ethical standards. All changes will be communicated to stakeholders promptly.

PERRY LIM

CHIEF EXECUTIVE OFFICER