

Specification Title: Code of Ethics



TF AMD MICROELECTRONICS (PENANG) SDN. BHD.

Code of Ethics:108-622

www.tf-amd.com.my/code-of-conduct
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ACKNOWLEDGEMENT :


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MR. NEOH SOON EE
Corporate Vice President (CVP)

08 / 22 / 2019 (MM/DD/YYYY)
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DATE

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1 Purpose

- 1.1 This policy is created to lay out the rules for behavior and provides the groundwork for a preemptive warning. Regardless of size, businesses count on their management staff to set a standard of **ethical** conduct for other employees to follow.

2 Scope

- 2.1 This policy applies to all workers including temporary, migrant, student, contract, direct employees, any other type of workers, suppliers & customers.

3 Responsibilities

- 3.1 All level of employees.

4 Reference

- 4.1 108-621-Anti Corruption
- 4.2 108-618-Juvenile, Young Worker & Apprentice
- 4.3 108-619-Freedom of Association & Collective Bargaining
- 4.4 108-617-Prevention of Involuntary Labor
- 4.5 108-994-Prevention of Sexual Harassment at Workplace
- 4.6 108-614-Anti Harassment & Abuse
- 4.7 108-996-Grievance Procedure
- 4.8 108-620-Remediation of Underage Labor
- 4.9 108-995-Disciplinary
- 5.0 109-999-Wages
- 5.1 108-319-Employment
- 5.2 108-900-Environmental, Health & Safety
- 5.3 00-1000.1-Corporate Purchasing Policy-Ethics
- 5.4 PG08-126.30 Intellectual Property

5 Fundamental Values

- 5.1 TF-AMD (“Company”) is deeply committed to following ethical business practices. Accordingly, above all else, we value:
- Integrity and honesty;
 - Openness and respect for others;
 - Execution and accountability;
 - Passion for customers, partners, and technology; and
 - Commitment to personal excellence and self-improvement
- To put these values into practice on a daily basis, we offer this Code of Ethics as a guide for ethical business conduct.

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6 How to Use the Code of Ethics

- 6.1 TF-AMD's Code of Ethics summarizes the general business practices and legal requirements that guide our decision making and business activities. The Code contains basic information about TF-AMD's policies as well as information about how to obtain guidance regarding specific business practices or compliance concerns. It is essential that you thoroughly review this Code and make a commitment to uphold its principles. We expect each employee, director, contractor, advisor, consultant, temporary employee, supplier customer or representative of TF-AMD or one of its affiliates to follow this Code when acting on behalf of TF-AMD or within the scope of a business relationship with TF-AMD.
- 6.2 The Code of Ethics is not intended to cover every issue or situation you may face as a TF-AMD employee. You should instead use the Code as a general reference guide. TF-AMD reserves the right in its sole discretion to modify or eliminate any of the Code's contents without prior notice. TF-AMD shall take reasonable actions to notify you of any such changes. It is your responsibility to be fully aware of and follow all standards applicable to your position. Nothing in this Code creates or implies an employment contract or term of employment.
- 6.3 Here are some questions to ask yourself if you are in doubt about any aspect of the Code of Ethics, a business situation, your own conduct or the conduct of another TF-AMD employee:
- Is it legal? If the action is illegal, do not do it.
 - Are you sure this is right? If not, ask someone about the matter.
 - Does it violate TF-AMD's Code of Ethics or any other TF-AMD policies?
 - Is it consistent with TF-AMD's values or your own personal values?
 - Is it fair and just?
 - How does it make me feel about myself?
 - What would my family think about it?
 - How would it look in a newspaper article?
 - What would I tell my child to do?
 - Will I sleep soundly tonight?
- 6.3 If you need details on a specific policy, need guidance regarding a business practice or compliance issue, or wish to report a possible violation, you must talk to your immediate supervisor, a manager, the Human Resources Department. If necessary or appropriate, please contact us via mailto: contactus@tf-amd.com or department on an anonymous basis with any concerns that you may have. TF-AMD will handle all inquiries discreetly and make every effort to maintain, within the limits allowed by the law, the confidentiality of anyone requesting guidance or reporting a possible violation.

7 Our Commitment: Integrity in All Our Interactions

- 7.1 Each day we interact with a variety of individuals and groups — including our customers, partners, competitors, co-workers, shareholders, suppliers, governmental and regulatory agencies, and the communities in which we operate. We are committed to interacting with all of these audiences in a respectful, ethical manner and complying with applicable laws and regulatory requirements.

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8 We conduct our business in compliance with applicable laws and regulatory requirements & labor standards.

8.1 General: We obey all the laws and regulations that govern the management of our business. We are responsible for understanding these laws and regulations as they apply to our jobs and our business and for preventing, detecting, and reporting instances of non-compliance to a member of TF-AMD's management, the Human Resources Department, or the Legal Department.

8.1.1 Labor Standards: We are committed to uphold the human rights of workers and to treat them with dignity and respect as understood by the international community. The labor standards are:-

- a) Freely Chosen Employment – use of forced, bonded or indentured labor, involuntary prison labor, slavery or trafficking of persons are prohibited at all times. **This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restriction of worker's freedom of movement inside the place of production or facilities, including access to drinking water, bathroom breaks, in-house clinic and the worker's dormitory room, except where necessary for worker safety and permitted by applicable laws and regulations.**
- b) Child Labor Avoidance – Child labor is not to be used in any stage of manufacturing. The term “child” refers to any person under the age of 15 (or the age where the law of the country permits)
- c) Working Hours – workweeks are not to exceed the maximum set by local laws and workers shall be allowed at least one day off per seven day week except for emergency or unusual situations.
- d) Wages & Benefits – Compensations paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Deductions from wages as a disciplinary measure shall not be permitted. **For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.**
- e) Humane Treatment – all disciplinary policies and procedures shall be clearly defined and communicated to employees. There shall be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers: nor is there to be the threat of any such treatment. Reviewing exercise is mention in para 10.1.

8.1.2 Regulatory Investigations, Inspections, and Inquiries: We are direct, honest, and truthful in our discussions with regulatory agency representatives and government officials. During

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investigations, inspections, and inquiries, we work with TF-AMD's Corporate Legal Department and cooperate by responding to appropriate requests for information.

8.1.3 International Business Activities: As a global company, TF-AMD complies with the applicable laws and regulations that govern its operations wherever it does business. TF-AMD acknowledges and respects the diverse cultures, customs, and business practices it encounters in the international marketplace. TF-AMD employees doing business internationally must comply with applicable laws and regulations and uphold this Code at all times. Cultural differences or local laws and customs should be considered in the application and interpretation of our Code. At TF-AMD, we are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate. We also have zero tolerance towards any form of bribery, corruption, fraud, extortion or embezzlement. This type of conduct is absolutely prohibited whether it is committed by an employee or anyone else acting on TF-AMD's behalf.

8.1.4 Sensitive Payments: TF-AMD complies with the anti-corruption practices of the countries, the Foreign Corrupt Practices Act (FCPA), and any international anti-corruption conventions in which it does business. TF-AMD shall not engage in any form of corruption, extortion, or embezzlement. TF-AMD and its agents, partners, and representatives will not be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving and accepting, either directly or indirectly through third party or promises of payment to foreign government officials for the purpose of inducing the individual to misuse his or her position to obtain or retain TF-AMD business or otherwise gain an improper advantage. TF-AMD also will not accept bribes or other means to obtain an undue or improper advantage.

8.1.5 Export Control: We observe restrictions applicable to our business placed on the export and re-export of products or components of a product, good, service, or technical data.

8.2 We build and maintain the trust and respect of customers, partners, shareholders and other audiences.

8.2.1 Responsible Leadership: We manage our business responsibly to maintain the confidence, respect, and trust of our customers, partners, shareholders, and other audiences. We are committed to acting with integrity, investing in new product development, being responsive and accountable to our customers and partners, and remaining a leader in our field. We continually seek new ways to improve our products, service, and responsiveness.

8.2.2 Communication: We apply standards of full, fair, accurate, timely, and understandable disclosure in reports and documents that are filed or submitted to governmental agencies. We establish and maintain clear, honest, and open communications; listen carefully; and build our relationships on trust, respect, and mutual understanding. Our advertising, sales,

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and promotional literature seeks to be truthful, accurate, free from false claims, and supported by documentation.

We are committed to the ethical marketing and advertising practices that meet the standards set by external regulations & codes of practices, in particular:

- all laws and regulations dealing with marketing and advertising practices
- all global, regional and local industry codes relevant for our business
- privacy of TF-AMD customer information, including all relevant customer data

We are committed to a set of governing principles, on which we base all of our marketing and advertising activity, to include:

- **accuracy:** all marketing / advertising to undergo internal review for accuracy and compliance
- **clarity:** prohibit the use of misleading or deceptive statements about TF-AMD or its products/services
- **consistency:** all messaging to be consistent across platforms – social media, corporate website, company brochure, exhibitions and tradeshow
- **fair competition:** to uphold the best practices for fair competition and to prohibit the use of slanderous, defamatory and negative remarks about TF-AMD competitors
- **transparency:** communicate pertinent company information clearly with all constituencies in a timely manner

8.2.3 Competitive Information: TF-AMD has an obligation, and is entitled, to keep up with developments in our industry, including obtaining information about our competitors. We obtain information about our competitors through honest, ethical, and legal methods. You should not use any illegal or improper methods to acquire a competitor's confidential information.

8.2.4 Suppliers: TF-AMD's suppliers must adhere to the highest standards of ethical behavior and regulatory compliance. Suppliers are expected to provide high-quality services and products while maintaining flexibility and cost-effectiveness. We do not engage in any unethical or illegal conduct with our vendors. We do not accept incentives such as kickbacks or bribes in return for conducting business with them.

8.2.5 Contracts and Commitments: No employee may agree to or sign any contract, agreement or amendment (written or oral) binding TF-AMD in any way without appropriate authorization. If there are any questions about which employees have signature authority, please contact the Corporate Legal Department.

8.3 We are committed to truthful and accurate financial reporting.

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8.3.1 **Financial Integrity:** We comply with all applicable local, state, and federal laws regarding record completion and accuracy. We require that financial transactions be executed in accordance with management's authorization and be recorded in a proper manner to maintain accountability for TF-AMD's assets. The full and final terms of each transaction between TF-AMD and our customers and suppliers must be fully documented at the time of the transaction. Verbal or written "side" agreements or arrangements on material aspects of a transaction are inappropriate and a violation of this Code.

8.3.2 **Financial Reporting:** We honestly and accurately record and report business information. Our financial information reflects only actual transactions and is in compliance with TF-AMD and other applicable accounting practices. All employees are expected, within the scope of their employment duties, to follow our disclosure controls and procedures. Each of our employees with responsibility for maintaining and completing TF-AMD's records must do so accurately and completely, including TF-AMD's internal and external reporting records and documents. No false, misleading or artificial entries may be made on TF-AMD's books, records or reporting. All transactions must be fully, accurately, honestly and completely documented and timely recorded in TF-AMD's accounting records and reporting. All processes for executing and recording transactions must also be followed, including all approvals and reporting required for pricing commitments and concessions to our customers and suppliers.

8.4 In addition to all other standards set forth in this Code, we hold our accounting and finance department personnel to the highest standards of accurate reporting.

8.4.1 TF-AMD's Chairman and Chief Executive Officer (CEO), Managing Director (MD), Chief Financial Officer (CFO), Finance Controller and other employees of the Finance Department hold an important and elevated role in corporate governance in that they are uniquely capable and empowered to ensure that all shareholders' interests are appropriately balanced, protected and preserved. The CEO, CFO and Finance organization employees are expected to:

- provide shareholders with reports and documents that are full, accurate, complete, objective, fair, relevant, timely and understandable;
- comply with rules and regulations of local governments, other private and public regulatory agencies, applicable generally accepted accounting principles, and TF-AMD's financial policies;
- act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing one's independent judgment to be subordinated;
- share knowledge and maintain professional skills important and relevant to shareholder's needs;
- proactively promote and be an example of ethical behavior as a responsible partner among peers, in the work environment and the community;

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- not unduly or fraudulently influence, coerce, manipulate, or mislead any authorized audit or interfere with any auditor engaged in the performance of an internal or independent audit of TF-AMD's financial statements or accounting books and records; and
- not alter, destroy, mutilate, or conceal a record, document or other object, or attempt to do so with the intent to impair the report or document's integrity or availability for use in an official proceeding;

8.5 We are responsible for the use, protection, and management of TF-AMD's assets.

8.5.1 **Use and Protection of Assets:** We wisely use and protect the assets of TF-AMD, including physical and intellectual property, supplies, consumables, and equipment. We use these assets exclusively for TF-AMD's business purposes.

8.5.2 **Fiscal Responsibility:** TF-AMD employees must spend TF-AMD's funds in a responsible manner. Each of us must take reasonable steps to ensure that we receive good value for TF-AMD money spent, and must maintain accurate and timely records of every expenditure.

8.5.3 **Donations and Sponsorships:** TF-AMD is committed to making a positive contribution in the communities where we do business but does not make charitable contributions to gain an improper advantage. All donations and sponsorships must be transparent and approved to ensure that they are given in a clear and open manner to those that need it most. Appropriate donations and sponsorships include donations and sponsorships to organizations supporting genuine independent medical research for the advancement of medical science or education, indigent care, patient education, public education, community organizations with or without a medical focus, or the sponsorship of events where proceeds are intended for charitable purposes. Although charity events in which TF-AMD participates may be organized or sponsored by customers or potential customers, donations to such events may not be linked, implicitly or explicitly, to an agreement to use, order or recommend TF-AMD services or a Principal products or be used to reward prior business. All donations and sponsorships must be pre-approved in writing/email by the MD or the Finance Controller as part of the approval process, you must provide details on the reasonable steps you have taken to ensure the donation will:

- Be given to a bona fide charity (e.g. evidence the charity is legitimate)
- Only be used for charitable purposes (e.g. written confirmation from the charity on what the donation will be used for).

8.5.4 **Use of Information Technology:** Whenever accessing and using Company-provided information technology and its contents, we should use good judgment and common sense; conduct ourselves ethically, lawfully, and professionally; and follow applicable authorization protocols. We do not create, access, download, view, store, print, solicit, or send any material that is intimidating, harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate, nor do we send any false, derogatory, or malicious communications. You are not entitled to an expectation of privacy with respect to information transmitted over, received by or stored in any electronic communications system owned, leased or operated in whole or in part by or on behalf of TF-AMD. To the

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extent permitted by applicable law, TF-AMD retains the right to gain access to any information received by, transmitted by or stored in any such electronic communications system, by and through its employees, agents, contractors or representatives, at any time, either with or without an employee's or third party's knowledge, consent or approval.

- 8.5.5 **Intellectual Property:** We comply with the laws and regulations that govern the rights to and protection of our own and others' copyrights, trademarks, patents, trade secrets, and other forms of intellectual property.
- 8.5.6 **Creation, Retention, and Disposal of Records and Information Assets:** We create, retain, and dispose of our business records and information assets, both written and electronic in compliance with TF-AMD's policies and applicable regulatory and legal requirements. It is our policy not to destroy or alter our records or documents (whether in paper form, emails, or otherwise) in response to or in anticipation of any legal proceeding or government inquiry or investigation.
- 8.5.7 **Confidential and Proprietary Information:** We respect our ethical and legal responsibilities to protect TF-AMD's confidential and proprietary non-public information and communicate it only as necessary to conduct TF-AMD's business. From time to time, we may disclose TF-AMD's confidential information to third parties to further TF-AMD's business, but only under an appropriate written nondisclosure agreement. We do not use this information for our personal advantage or for non-TF-AMD business use, and maintain this confidentiality even after TF-AMD no longer employs us. Similarly, TF-AMD's policy is that no employee, officer or Board member is to reveal any information on TF-AMD that might reasonably be considered a trade secret of a former employer.
- 8.5.8 **Insider Information and Securities Trading:** In the course of business, we may become aware of material non-public information about TF-AMD or a customer, supplier or partner. Information is considered "material" if there is a substantial likelihood that a reasonable investor would consider it important in making a decision to trade in the public securities of that company. We discuss this information on a limited, "need to know" basis internally, and do not share it with anyone outside TF-AMD. We do not buy or sell the public securities of any company on the basis of such information, and we do not share this information with others.

- 8.6 **Conflicts of Interest:** TF-AMD employees are expected to act in TF-AMD's best interests and to exercise sound judgment unclouded by personal interests or divided loyalties. Both in the performance of our duties for TF-AMD and our outside activities, we seek to avoid the appearance of, as well as any actual, conflict of interest, including conflicts that might arise from outside employment, directorships with other companies, business interests or investments in companies that do business with TF-AMD, or transactions between TF-AMD and a party related to you. TF-AMD requires that you disclose any situation that could reasonably be expected to give rise to a conflict of interest. Although such situations are not automatically prohibited, they are not desirable and may only be waived by TF-AMD's Chief Financial Officer or Chief Executive Officer and with the concurrence of the Board of Directors.

8.6.1 **Favored treatment of family and friends**

Do not use your position to give or obtain favored treatment for family members or others with whom you have a close relationship. This applies to hiring, promoting, selecting contractors or vendors, and all other business matters.

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- 8.6.1.1 Employees must disclose to their manager any potential conflict when recommending a friend or relative for a position at the Company.
- 8.6.1.2 No employee may conduct outside business on behalf of the Company with a person with whom he or she is related by blood, marriage or domestic partnership, including making loans to or guaranteeing the obligations of such person on behalf of the Company.
- 8.6.1.3 No employee may conduct Company business with an outside organization that employs an individual related by blood, marriage or domestic partnership or who has a significant association to a Company employee, without first having the approval of his or her department's vice president.

8.6.2 Financial Treatment in other businesses

Employees should not have any direct or indirect financial interest with a present or prospective Company customer, competitor or supplier that could cause divided loyalty or the appearance of divided loyalty. This prohibition does not include passive investments of not more than one percent of the total outstanding shares of any publicly-traded company.

8.6.3 Influencing Business Decisions for Personal Gain

When you represent the Company, you must avoid any real or apparent conflict between your interests and those of the Company. Without approval from a Company vice president, you must not participate in or attempt to influence a decision or transaction that would enhance a significant financial interest held by you, a family member or a person with whom you have a close personal relationship. If you have any doubt about potential conflicts, disclose the investment to your director or vice president, so that your organization can evaluate whether you should continue to participate in a particular decision making process. A decision to include or exclude an employee from the process must be documented with your Vice President's approval, and Law Department approval may be required.

8.6.4 Giving or Accepting Gifts, Entertainment and Other Gratuities

Employees should always use caution in giving or receiving gifts, entertainment, or other gratuities to avoid even the appearance of impropriety. While the Company may allow employees to accept or offer unsolicited gifts or gratuities to aid in building or strengthening legitimate business relationships, accepting or offering a gift or gratuity in a business setting can create a sense of obligation or even create a conflict of interest.

If the acceptance or offer of any gift or gratuity (regardless of value) could be viewed as resulting in an unfair business advantage or could create the appearance of or an actual conflict of interest in connection with your employment, it violates the Company's policy against conflicts of interest.

Entertainment, provided or received, must fit all of the following criteria:

- 8.6.4.1 Incidental to a legitimate business discussion
- 8.6.4.2 setting is appropriate for a business discussion

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- 8.6.4.3 cost/value is within RM500 maximum per person (exceptions must be approved in advance by your Corporate Vice President, or next-level manager if you are a Corporate Vice President)
- 8.6.4.4 purpose is not to obtain special or favored treatment
- 8.6.4.5 conforms with generally accepted business practices, legal
- 8.6.4.6 and ethical standards
- 8.6.4.7 public disclosure would not embarrass TF-AMD, including
- 8.6.4.8 frequency of the entertainment
- 8.6.4.9 was not solicited or requested by the receiving party
- 8.6.4.10 attended by at least one representative for each company
- 8.6.4.11 if provided by TF-AMD, it is properly recorded in the Company's
- 8.6.4.12 books and records
- 8.6.4.13 attendees do not include government officials; advance
- 8.6.4.14 approval must be secured, if any government officials will be attending

8.6.5 **Bribery/Anti-Corruption Laws**

Do not use your position to give or obtain favored treatment for family members or others with whom you have a close relationship. This applies to hiring, promoting, selecting contractors or vendors, and all other business matters.

8.6.6 **Outside Employment**

The Company expects you to devote your full work time to your commitment to the Company. Therefore, all employees are discouraged from maintaining outside employment.

Employees shall not engage in any outside work if such work lessens efficiency, alertness, interest or productivity at the Company, or compromises your obligations to the Company.

8.6.7 **Corporate Opportunities**

You are prohibited from (1) taking for yourself, personally, opportunities that are discovered through the use of corporate property, information or position; (2) using corporate property, information or position for personal gain; and (3) competing with the Company. You owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

8.6.8 **Board Appointments**

Company employees must obtain approval before assuming a position on the board of another company or for-profit entity. Membership on charitable or community boards does not require pre-approval but such activity must not interfere with your work duties or reflect negatively on the Company.

8.6.9 **Holding an Elected or Appointed Office**

If you seek or hold an elected or appointed office while employed by the Company, you must excuse yourself from involvement with any issue or decision that could create or appear to create a conflict of interest. Also, avoid performing civic responsibilities on Company time. Seek approval from management for any exceptions to this general rule.

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8.6 We promote a diverse, cooperative, and productive work environment.

8.6.1 Openness, Honesty, and Respect: In our relationships with each other, we strive to be open, honest, and respectful in sharing our ideas and thoughts, and in receiving input.

8.6.2 Diversity: TF-AMD promotes and supports a diverse workforce at all levels of the company. It is our belief that creating a work environment that enables us to attract, retain, and fully engage diverse talents leads to enhanced innovation and creativity in our products and services.

8.6.3 Equal Employment Opportunity: TF-AMD promotes a cooperative and productive work environment by supporting the cultural and ethnic diversity of its workforce and is committed to providing equal employment opportunity to all qualified employees and applicants. We shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. In addition, workers or potential workers should not be subjected to medical tests that could be used in a discriminatory way except for health and safety reason. We take allegations of harassment and unlawful discrimination seriously and address such concerns that are raised regarding this policy.

8.6.4 Freedom of Association: Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. In conformance with the law, TF-AMD shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or representatives shall be able to openly communicate and share ideas and concerns with management regarding working condition and management practices without fear of discrimination, reprisal, intimidation or harassment.

8.6.5 Safety and Health: TF-AMD complies with all applicable safety and health regulations and appropriate practices.

8.7 We are responsible, caring members of the global community.

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8.7.1 Citizenship and Community Service: We are committed to the improvement of society as well as the communities we serve and in which we operate. We encourage the support of charitable, civic, educational, and cultural causes.

8.7.2 Respect for the Environment: TF-AMD respects the environment and protects our natural resources. We comply with applicable laws and regulations regarding the use and preservation of our land, air, and water. Environmental laws & recognized management standards – ISO14001, governs nearly all manufacturing operations, especially those causing emissions of materials into the air, land, or water. Incidents such as accidental releases and spills must be reported to the appropriate governmental agencies. In addition to complying with applicable laws, TF-AMD and its directors, officers and employees are committed to continuously improving TF-AMD's facilities to ensure that they are operated safely. This goal is accomplished through:

- Environmental Permits and Reporting: All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.
- Pollution prevention and Resource Reduction: The use of resources and generation waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.
- Hazardous Substances: Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.
- Wastewater and Solid Waste: A systematic approach to identify, manage, reduce, and responsibly dispose of recycle solid waste (non-hazardous). Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated as required prior to discharge or disposal. In addition, measures should be implemented to reduce generation of wastewater. Besides that routine monitoring of the performance of its wastewater treatment systems shall be conduct.
- Air Emissions: Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored and treated as required prior to discharge. Operations shall be conduct routine monitoring of the performance of its air emission control systems.
- Product Content Restrictions: TF-AMD will adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

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- Storm Water Management: TF-AMD have a systematic approach to prevent contamination of storm water runoff. TF-AMD shall prevent illegal discharges and spills from entering storm drains.
- Energy Consumption and Greenhouse Gas Emission: Energy consumption and greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level. TF-AMD are to look for cost-effective methods to improve energy efficiency and to minimize the energy consumption and greenhouse gas emissions.

8.8 Our Responsibilities

All TF-AMD employees are accountable and responsible for understanding and complying with the Code of Ethics, applicable laws, regulations, and TF-AMD policies that are related to their jobs. In fulfilling these responsibilities each employee must:

- read, understand, and comply with the Code of Ethics and all TF-AMD policies that are related to his/her job;
- participate in training and educational programs/events required for his/her job;
- obtain guidance from your immediate supervisor, a manager, the Human Resources Department, or the Corporate Legal Department for resolving a business practice or compliance concern if he/she is uncertain about how to proceed in a situation;
- report possible violations of the Code of Ethics, policies, applicable laws, and regulatory requirements to your immediate supervisor, a manager, the Human Resources Department, or the Corporate Legal Department;
- cooperate fully in any investigation; and
- make a commitment to conduct TF-AMD's business with integrity and in compliance with applicable laws and regulatory requirements.

8.9 Administration and Enforcement

The Code of Ethics is endorsed by and has the full support of TF-AMD's MD & Management Team. The TF-AMD's MD & Management team are responsible for overseeing compliance with and enforcing the Code of Ethics. The Code will be available on TF-AMD's website: www.TF-AMD.com.

In addition, Risk Assessment and Risk Management processes to identify environmental, health and safety and labor practices and ethic risks are put in place to ensure implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

Violations of TF-AMD's Code of Ethics cannot and will not be tolerated. Consequences for such violations may include disciplinary action up to and including termination of employment. Individuals

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who have willfully failed to report known violations will also be subject to disciplinary action. Where appropriate, TF-AMD may also refer violations to law enforcement or to regulatory agencies for investigation, and this may result in civil and/or criminal penalties for the employee or TF-AMD.

All managers are responsible for promoting compliance with this Code of Ethics by all employees reporting to them. Failure of a manager to take immediate measures to report and correct a reported violation of this Code of Ethics is itself a violation of the Code of Ethics and will not be tolerated.

Waivers of provisions of the Code of Ethics that are granted to any director or executive officer of TF-AMD must be approved in advance, if at all, by TF-AMD's MD and Management Team. Any such waiver that is granted to a director or executive officer will be disclosed, to the shareholders along with the reasons for granting the waiver, as required by applicable laws, rules, and regulations.

9 Protection of Identity/Whistleblowing and Non-Retaliation

9.1 All whistleblowers identity shall be treated with strict confidentiality. We will not tolerate any retribution or retaliation taken against any employee who has, in good faith, sought out advice or has reported a possible violation. Any retaliation against an employee because the employee, in good faith, sought help or filed a report will result in disciplinary action against the retaliator, up to and including termination of employment. We have communicated process for all personnel to be able to raise any concerns without fear of retaliation.

a) Communication/Reporting Mechanism:

- i. We encourage employees to report in confidence promptly any believed violation or possible violation of a federal or state law, rule, regulation or provision applicable to TF-AMD or of this Code to your immediate supervisor, a manager, the Human Resources Department or the Corporate Legal Department.
- ii. However, when reporting possible violations employees should be conscious of any obligations of confidentiality to TF-AMD or requirements not to disclose TF-AMD trade secrets (or secrets of our partners, affiliates or third parties).

If any employee believes he or she has been subjected to any harassment, discrimination or retaliation or other action by us or our agents for reporting believed violations or potential violations in accordance with this policy, he or she should contact, as appropriate, your immediate supervisor, a manager, the Human Resources Department or the Corporate Legal Department so that TF-AMD can investigate the matter and take appropriate corrective action.

Any employee who makes a knowingly false report of a possible violation for the purpose of harming another individual or TF-AMD, that employee will be subjected to disciplinary action.

10 Others.

10.1 This policy review exercise shall be reviewed yearly or as when needed.

****Remarks: The above code of ethics is reference to RBA – Responsible Business Alliance***