

TOP GLOVE[®]

TOP QUALITY, TOP EFFICIENCY

ANTI BRIBERY & ANTI CORRUPTION eHANDBOOK

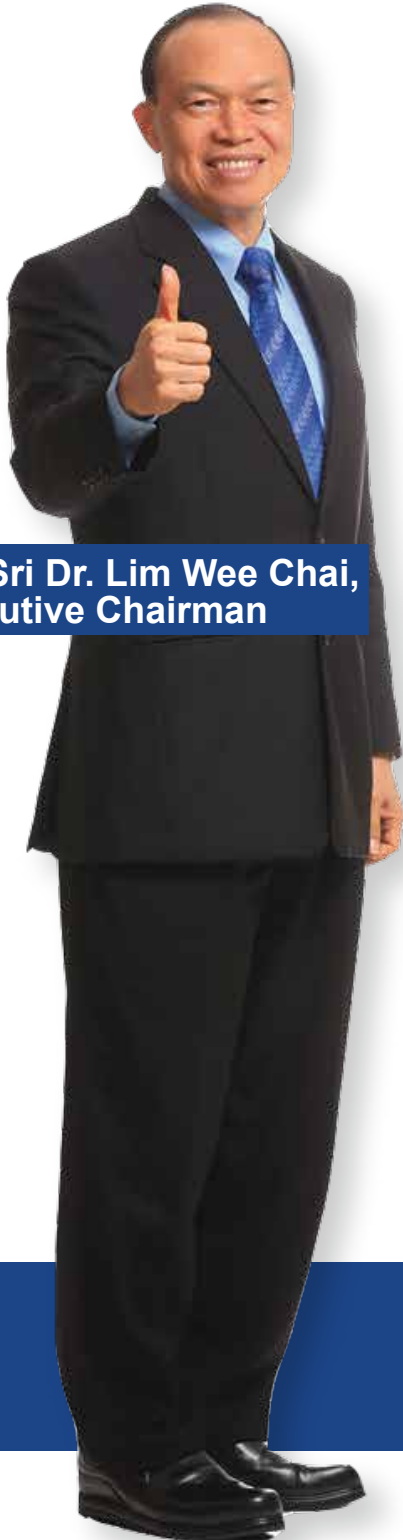


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CHAIRMAN'S MESSAGE



**Tan Sri Dr. Lim Wee Chai,
Executive Chairman**

Welcome to the second edition of our ANTI-BRIBERY AND ANTI-CORRUPTION HANDBOOK, an effort by our Corporate Integrity which formerly known as HIT Unit (HIT= Honesty, Integrity, Transparency) to create awareness and offer guidance on this very important topic.

At Top Glove, our stand against corruption is clear. Underscoring our commitment to prevent corruption and uphold integrity in the conduct of our business, we established the Top Glove Prevention and Anti-Corruption Committee (TGPAC) in 2009.

In addition, Top Glove was among the first to sign the Corporate Integrity Pledge and Anti-Corruption Principles for Corporations, in March 2011.

In 2017, we became the first private company to receive the ISO37001:2016 Anti-Bribery Management Systems (ABMS) certification. At the company level, we also organised the Top Glove Anti-Corruption Day yearly, during which all senior management sign the Top Glove Corporate Integrity Pledge.

In 2020, marked a great transformation from Top Glove where we support the enforcement of MACC Corporate Liability Section 17A by extending and expanding further ABMS implementation throughout Top Glove Corporation Bhd.

For us corruption is abnormal, unacceptable and something we have zero-tolerance for. We are very serious about its prevention, to which end we have robust anti-corruption policies and practices in place within our organisation.

**Honesty leads to a good heart,
Integrity increases value in the organisation,
Transparency guides a clean business.**



MANAGING DIRECTOR'S FOREWORD



**Dato' Lee Kim Meow,
Managing Director**

Our Business Ethics require all Top Glovers to act with Honesty, Integrity and Transparency. Every one of our employees wear an anti-corruption badge. This may seem small, but it serves as an effective reminder to us to act with integrity at all times, whether or not someone is watching.

Why is integrity important to us? Because it paves the way for us to become an advanced company, country and individual. The opposite is also true: a lack of integrity will eventually collapse a company, country and individual.

It is very encouraging to see that restoring integrity and establishing preventive measures for corruption is a key priority for the government of the day. However, the government cannot fight and win the battle against corruption alone. We, as businesses, employees and citizens have an important role to play.

This handbook is a timely initiative in our bid to eradicate unethical behaviour and instil a culture of integrity at Top Glove, but we are by no means at the finish line. This is just one of many initiatives we will be working on to ensure we as a company and our employees remain free of bribery and corruption, so we are not only able to take our business to the next level of success but also contribute positively to our country.

**Integrity is in our products,
Integrity is in our organisation,
Integrity is in our heart.**



PREFACE

Bribery and Corruption has long been a major obstacle to socio-economic development, distorting business practices. Bribery has come to be regarded as a must in business, an unhealthy custom which has now become deeply-rooted and is difficult to remove.

At Top Glove, integrity is one of the fundamental values that we look for in the people we hire, as it is the foundation on which we build relationships, trust, and effective interpersonal connections. We are committed to the highest levels of ethical behaviour and compliance with laws and regulations, and it is expected that all employees and business associates also conduct themselves in accordance with our values, policies, procedures as well as laws relating to bribery and corruption.

This handbook serves as a general guideline on how our employees and other business associates should respond to the threat and risk of corruption. It will guide you on complying with our business policy, address management’s commitment and expectations, set out standards and requirements, as well as discuss guiding principles.

However, this handbook is not intended to be exhaustive or offer definite solutions regarding corruption. Rather, the intention is to provide a basic outline towards a better understanding of the risks associated with corruption and your obligations to actively combat its occurrence.

When in doubt, you are encouraged to always seek advice from your superior or Corporate Integrity .



The Board of Directors and top management demonstrate support of the W.H.I.T.E Integrity Culture by wearing white shirt on every first Wednesday of the month



TOP GLOVE'S JOURNEY IN INSTITUTING INTEGRITY

Top Glove has zero tolerance for corruption and is firmly opposed to corruption in all its forms. We are committed to doing business in accordance with the highest ethical standards; we believe the success of an organisation is built on the trust of customers, employees, suppliers, vendors, contractors, bankers and the general public and this is earned by our demonstrating ethics and integrity in business practices. We observe the law and high standards of ethical behaviour not out of legal obligation, but because this is the right thing to do.

Underscoring our commitment in this very important area, in early 2009, Top Glove set up the Top Glove Prevention and Anti-Corruption Committee (TGPAC) with the objective of promoting an anti-corruption mind set and instilling honest and transparent practices among all Top Glove employees, as well as providing an avenue for its employees and the public to lodge complaints of any corrupt practices within the company. This is well-aligned with Top Glove's core values, business principles and policies which reflect its focus on making ethics and anti-corruption an integral part of Top Glove's business operations.

Deepening our commitment to upholding the practice of integrity, Top Glove became the first company from the private sectors to be certified with ISO37001:2016, Anti-Bribery Management Systems (ABMS) in November 2017. The driving force behind our pursuit of this official recognition was our desire to engage positively in combating bribery and infuse the element of integrity into the culture of the organisation.





In September 2017, we took our fight against corruption into the next level. Corporate Integrity was established to maintain the Anti-Bribery Management System (ABMS) in Top Glove, the key focus being to oversee the ABMS design implementation while providing advice and guidance to employees on the ABMS and issues relating to bribery. In addition, HIT is responsible for ensuring that the company conforms with requirements of the certification and reports on the performance of the ABMS to the governing body and top management, as well as other compliance functions.

In 2020, the gazetted law of MACC Corporate Liability Act Section 17A formally came into enforcement on June 1st. Corresponding to 17A, Top Glove extended and expanded further its ABMS implementation which integrated with MACC Adequate Procedures to Top Glove Corporation Bhd and its subsidiaries by phases.

Our anti-corruption and prevention journey is one which is ongoing. Business is becoming increasingly exposed to the many threats and dangers associated with corruption. To effectively combat corruption, it is imperative that the entire range of stakeholders involved in the business process adheres to the highest standards of integrity. Accordingly, we expect our employees, business partners, including suppliers, contractors, distributors, agents, bankers, auditors and joint venture partners to abide by the same principles in their own operational settings.



THE DEFINITION OF BRIBERY & CORRUPTION

What is bribery & corruption?

Bribery and corruption means giving, offering or receiving an undue reward with the intention of influencing the behaviour of someone in order to obtain or retain a commercial advantage. It is the abuse of entrusted power for private gain.

What forms can bribery and corruption take?

Bribery and corruption can take many forms including cash, cash equivalents, gifts, entertainment, position, travelling benefits, accommodation or other services to an individual and/or their friends and family members.





RELATED OFFENCES



Asking for or receiving bribes

Any person asking for or receiving bribes as an inducement or reward in an official transaction.

➤ **s.16 (a) and 17 (a) MACC Act 2009**



Offering or giving bribes

Any person offering or giving bribes to public or private sector officials in an official transaction.

➤ **s.16 (b) and 17 (b) MACC Act 2009**



False Claim

Any person submitting false claim in payment requisitions.

➤ **s.18 MACC Act 2009**



Abuse of public office

Abuse of office or position by a public official in making decisions for purpose of self-interest.

➤ **s.23 MACC Act 2009**

Corporate Liability Section 17A



It criminalizes commercial organizations (which includes Malaysian companies and foreign companies conducting any business in Malaysia) if an associated person corruptly gives any gratification with intent to obtain or retain business, or an advantage in the conduct of business, for the commercial organization.



FACILITATION PAYMENTS

Facilitation payments are made to public officials to quicken or speed up a routine service that the official is obliged to perform without receiving such payment. It is a form of bribery and corrupt payment which involves any sort of advantage or gratification among others being cash, cashless transaction, gifts, vouchers, coupon, services, properties, etc.

What you need to know?

Top Glove is wholly opposed to facilitation payments. Even though such payments may be commonplace, they are considered illegal in most countries and at Top Glove.

What you must do?

You shall not pay if faced with such demands. This applies whether the demand is made directly or indirectly through a consultant or other intermediary. Therefore, you have to ensure proper endeavors are used to procure or have relevant third parties including government officials and servant to perform their routine services or functions. In relation, you must clarify that a proper endeavors are documented and any payment made is accurately recorded and press for clarity in payment procedures involving government officials and encourage transparency.



MONEY LAUNDERING

Money laundering is the illegal process of financial transaction with amounts of money in which it aims to conceal the identity, source and origin which derives from criminal activities such as drug and human trafficking into acceptable and clean money.



What you need to know?

Top Glove shall not tolerate any form of money laundering activities in the Company and never accept any suspicious or unidentified money origin as well as already recognised illegal money after conducting adequate measures and financial due diligence.



What you must do?

You shall abide by and comply with all relevant anti-money laundering laws and regulation. Appropriate measures shall be undertaken to prevent the Company's financial transactions from being used by others to launder money. You need to be mindful of money laundering risk and to promptly raise any suspicious transactions to the Company. You shall inform the superior immediately in any events which raise doubt on any financial transactions received from business partners that leads to money laundering. You shall conduct proper due diligence and screenings to understand the nature of business and background of the companies associated with business partners / external stakeholders prior making relevant decision. You shall practice reasonable controls and reporting mechanism are put in place to monitor suspicious activity including suspicious transaction that could be involved in laundering.



POLITICAL DONATION & INVOLVEMENT

Political contribution refers to anything of value given, loaned or advanced, whether directly or indirectly, which influence local, national or regional political campaign, political organisations, lobbyists or lobbying organisations and trade associations, to influence political campaign or legislation.



What you need to know?

Top Glove does not allow any contribution in cash or in kind shall be made in support of a political cause, political party, political party officials, or candidates or political office, political campaigns, political organizations, lobbyist, lobbying organisations, trade associations and tax-exempt groups whose role is to influence political campaigns or legislative activities.



What you must do?

You shall not make or offer directly or indirectly any monetary or political donation or contribution in kind to political parties, political party officials or candidates for political office, for an unduly favour in company interest. All conduct of the company shall preclude any activity that could tantamount to favour with any political body, political party officials or candidates for political office. You shall provide accurate recording of non-political donation payments in the books and proper due diligence had been carried out on beneficiary or recipient of such donations. You shall refer to procedures on such donation payments and ensure clear and simple procedures are adopted. You shall ensure all transactions are supported with proper record and documentations. If it is above your authority to deal with the entity, you shall inform the management regarding the situation.



ANTITRUST / ANTI-COMPETITION



Antitrust refers to a commitment to foster fair competition in the market. Anti-competitive behavior: includes but is not limited to cartel activities, price fixing, and antitrust activities.



What you need to know?

Top Glove prohibits agreements or practices that restrict competition in the market such as price fixing, market sharing, bid rigging, abuse of dominant position, etc. The company is committed to fostering fair competition in the market and shall comply with all applicable antitrust laws. The company also works diligently to demonstrate their awareness of antitrust laws when engaging with competitors or supplier.



What you must do?

You must seek advice and ensure agreement or contracts are reviewed by Legal Department in the event any question in relation to antitrust compliance may arise. You shall endeavor to increase awareness on antitrust compliances and conduct risk assessment to ensure compliance.



GIFTS, FAVOURS & BUSINESS COURTESIES

At Top Glove, you can only offer, give, accept or receive gifts that are considered as promotional items, preferably bearing a company logo, of minimum value.



What you need to know?

Exchanging gifts are often a part of Malaysian culture especially during festive seasons. A gift can be anything of value including items such as fruit baskets, smartphones or expensive watches, or benefits such as vouchers, travel packages or VIP memberships, which may have the appearance of an advantage. Top Glove is guided by the Gift Policy, which respects our culture while setting parameters for acceptable conduct.



What you must do?

You should fully understand the Top Glove Gift Policy and inform your business partners of its provisions. Cash or gifts that are convertible to cash are not to be given or received. Gifts that are not given in an open and transparent manner will be regarded as questionable and can be construed as an attempt to influence a business decision.

**TOP GLOVE
FOUNDATION****TOP QUALITY, TOP EFFICIENCY**

CHARITABLE DONATIONS & SPONSORSHIP

On 14 June 2009, Top Glove Foundation (TGF) was officially launched with the objective of providing funds for the purpose of charity, education and activities related to environment and community.

What you need to know?

TGF focus on 3 Philanthropic objectives:

Community

To drive positive change in the needy community welfare engagement such as community events and financial support.

Education

To provide quality education through scholarship, advancement of education and other educational related funding.

Environment

To carry out environmental activities to raise awareness on the environmental conservation

What you must do?

You may refer to TGF for enquiries regarding charitable donations and sponsorships. All requests must be made via proper channels and documentation. It is your responsibilities to read and understand all guidelines and conditions before contributing or applying for donations or sponsorships via TGF.



CONFLICT OF INTEREST



Conflict of interest arises when there is a clash between a person's duties and their personal interests where the personal interests may influence the performance of their duties.

What you need to know?

Using the company's property for personal purposes is considered unethical and deemed an act of corruption. So too, doing personal work during working hours.

Another example of unethical behaviour is when a person makes a decision or performs an act that provides an advantage to them, a person close to him or her, or to a third party. For example, a procurement head hires his family member for a position although he or she is not qualified for the role. This is also called nepotism.

What you must do?

Company assets are meant for business, and not personal use. We all have a responsibility to protect and safeguard company assets from loss, theft, misuse and waste.

You must know how to differentiate and separate between obligatory duties and your own private interests. Your actions must at all times be guided by procedural restrictions and the company's practices.



FALSIFYING DOCUMENT



Falsifying document involves altering, changing, or modifying a document for the purpose of deceiving another person and normally involves illegal monetary benefits. The term is also used when a person knowingly makes an untrue statement or claim to gain a benefit or reward.

What you need to know?

Dishonest acts to defraud the employer, such as tendering false academic certificates to support a job application or promotion, falsifying work documents including work records, time cards and medical certificates (MCs) to support sick leave claims are all considered workplace misconduct. Other examples include:

- Creating bogus customer records and bank accounts so that false payments can be generated.
- Altering payee details and amounts on cheques and payable orders in an attempt to cash them.
- Creating false payment and financial information to support fraudulent claims for personal benefits.
- Authorising payments to oneself.

What you must do?

An employee's dishonest or deceptive acts may warrant dismissal as dishonesty is reflective of the fitness of the employee to continue in office. Remember an employee is expected to act with complete honesty and integrity, no matter what position he or she holds in an organisation.



KICKBACKS



Kickbacks can take many forms, but all features some sort of collusion.



What you need to know?

Kickbacks are often associated with procurement transactions. For example, when procuring office supplies, the purchasing officer is typically required to obtain and compare several quotations from different suppliers. However, a supplier may reach out to a purchasing officer and indicate that if the supplier were to be successful in his bid, the officer may receive a compensation (“kickback”), which could be anything from cash to flight tickets.



What you must do?

Look out for red flags. The following signs do not necessarily mean that corruption exists, but multiple warning signs simultaneously raises the likelihood:

- Non-competitive evaluation process
- Higher-than-average prices for goods or services
- A vendor with frequent legal or regulatory problems
- Employees becoming too friendly with vendors
- Pressure on staff to use a particular vendor
- Continue use of vendors who provide poor products or services



A SHARED RESPONSIBILITY: WHAT IS YOUR ROLE?

We are all too familiar with the concept of corruption. However, recognising corruption is not always easy, especially when it involves being aware of our own actions. As such, many people accept corruption as a normal part of doing business because they believe this is how things should work. This acceptance, in turn, enables corruption to flourish even more. It becomes a vicious cycle. However, is it possible for us to succeed in business without engaging in corruption? The answer is an absolute Yes!

The Malaysian Government has set out rules and measures to curb corruption in the country but the responsibility for eradicating corruption must also be borne by members of society for these rules to be truly effective. We, as responsible global citizens share a responsibility to ensure we comply with the highest standards of integrity. We are all responsible for understanding the legal and ethical issues that may affect the company's reputation as well as our business relationships in the long term.

To ensure we do our part, we must first read and understand Top Glove's Business Code of Conduct and the requirements identified in the Top Glove Anti-Bribery and Anti-Corruption Policy. We must also at all times be mindful that we are signatories of the Corporate Integrity Pledge and adhere to Top Glove Business Ethics of Honesty, Integrity and Transparency. In addition, our participation in training and activities related to the topics of Integrity and Anti-Corruption is required.

Everyone has a role to play in combating corruption whether it is to act responsibly or lead by example. It is our joint responsibility to create a conducive environment in which the values of honesty, integrity and transparency are upheld and our business can flourish.

**BE FIRM AND NEVER COMPROMISE ON
ETHICS WHEN DOING BUSINESS**





TOP GLOVE ANTI-BRIBERY ANTI-CORRUPTION

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

WE ARE STRONGLY COMMITTED TO:

1. PREVENTING BRIBERY AND CORRUPTION WITH ZERO TOLERANCE POLICY

Management have to communicate within the organization about the policy, manuals and procedure.

2. COMPLYING WITH ALL APPLICABLE LAWS AND REGULATIONS

Management and all employees are responsible in their actions or doings to ensure that they complying with the laws and regulations, in any country we operated. Ensure that each of corruption and bribery case found, legal actions will be carried out without any kind of tolerance.

3. FOSTERING GOOD ETHICS IN RAISING CONCERNS

Each employee is encouraged to make report (whistleblowing) immediately if discover a bribery case.

AND CONTINUOUS IMPROVEMENT IS OUR DUTY

Every documented records will be kept and reviewed for further improvement to the system and procedures for the anti bribery management system.



ISO 37001:2016 ABMS STANDARD COMPLIANCE



Dato'Lee receiving the ISO 37001:2016 ABMS Certification on behalf of Top Glove

The most common form of corruption is bribery, which is the giving of a benefit to someone to influence his or her action or decision. A bribe does not necessarily involve money and can be in non-monetary forms as well.

What is certain however, is that bribery will limit a company's growth as it increases cost, jeopardises innovation and diminishes the quality of product and services, which can destroy the trust placed in an organisation.

Several policies have been introduced to tackle the issue of bribery. However, a well-managed organisation like Top Glove is expected to facilitate compliance with these policies through a proper management system, which will help implement policies and procedures and set reasonable controls according to the bribery risks faces by the organisation.

This may not eradicate bribery in totality but will help Top Glove to implement, maintain and improve its measures to prevent, detect and respond to bribery.

In December 2017, Top Glove became the first organisation from the private sector to be awarded with ISO 37001:2016 Anti Bribery Management Systems. Led by our Managing Director, Dato' Lee Kim Meow, we successfully obtained this very meaningful certification, demonstrating Top Glove's commitment to creating and instilling an organisational culture built on integrity.

In FY2020, responding to the enforcement of MACC Corporate Liability Provision Section 17A, Top Glove extended and expanded Anti-Bribery Management System scope and implementation to all its subsidiaries. External and independent audits on the ISO



37001:2016 ethical standards are performed annually to ensure validity and continued compliance.

In FY2021, Top Glove Corporation covering 28 departments located in Malaysia are assessed for risks related to corruption. Risk control, due diligence and anti-bribery & anti-corruption control (ABAC) are carried out on these departments to reduce, mitigate and prevent potential risks.

We still have a long way to go. However, Top Glove is ready to take on every challenge and overcome every hurdle to ensure that our people and business associates understand their responsibilities to operate according to the highest ethical standards.



Group photo of Top Glove Management and staff with SIRIM QAS International auditors during ISO 37001:2016 Anti Bribery Management System Certification Audit 2022



NATIONAL ANTI-CORRUPTION PLAN (NACP) 2019-2023



The National Anti-Corruption Plan (NACP) is a five-year plan initiated by the government towards preventing and combating corruption. It is also one of the government's initiatives in realising the government's manifesto towards a nation which champions integrity and is free from corruption. The NACP was launched on the 29 of January 2019 at Putrajaya. The implementation of this plan was developed by the National Centre for Governance, Integrity and Anti-Corruption (GIACC) in the Prime Minister's Department in collaboration with other government agencies.

Present for the launch were Deputy Prime Minister Datuk Seri Dr Wan Azizah Wan Ismail; Chief Secretary to the Government Datuk Seri Dr Ismail Bakar; Director-General of Governance, Integrity and Anti-Corruption Center, Prime Minister's Department (GIACC), Tan Sri Abu Kassim Mohamed; Chief Commissioner of the MACC, Dato' Sri Mohd Shukri Abdull, Cabinet Ministers, Ministers and Chief Ministers.

Tan Sri Dr. Lim Wee Chai, the Executive Chairman of Top Glove, was invited as a representative and sole recipient of the NACP Blueprint from the private sector. Following this, Tan Sri initiated the Top Glove Anti-Corruption Plan appreciation and support of the government's effort and a strategy and guide to prevent and combat corruption at Top Glove.



DEALING WITH PUBLIC AUTHORITIES

Extra caution must be made with respect to interaction with public officials.

Top Glove employees are required to exercise extra caution with respect to gifts and arrangements involving public officials, including international organisations and NGOs (Non-Governmental Organisations). Any appearance of an attempt to influence public officials must be avoided.

Limits

Refer to the Top Glove Gift Policy for guidance on what is permissible and within the limits of the policy.

Be Aware

Public officials may have strict rules on what they may receive. Be sure to always check whether a gift or an arrangement is compliant with such rules.





RELATIONSHIPS WITH BUSINESS PARTNERS

Top Glove's business partners, whether suppliers, contractors, distributors, agents or joint venture partners are an extension of the Top Glove brand.

Top Glove will be held liable for corrupt activities carried out by business partners with whom Top Glove has a contractual relationship. Due care must therefore be exercised in the selection of business partners.

Background Checks

All required background checks must be performed to verify a business partner's reputation and expertise. Ensure the selection process is strictly adhered to and enforced, and when auditing suppliers, identify the sub-contractors as well.





CONSEQUENCES OF MISCONDUCT



Imprisonment & Heavy Fine

Imprisonment up to 20 years, and fine of RM 10,000 or 5 times the bribe amount, whichever is higher



All Ill Gotten Assets Confiscated



Humiliation of Self and Family



Loss of Job and Career



Unable to Lead a Normal Life



WHISTLEBLOWING POLICY



It is important to Top Glove that you speak up!

Our Business Ethics apply to everybody within the Top Glove group regardless of their position or seniority. Upholding the values of Honesty, Integrity and Transparency in our daily business operations is expected at all levels. In the event you learn of any unethical behaviour, a Whistleblowing Policy has been established to enable you to make a report confidentially.

The Policy

Whistleblowing reports have to be made in good faith with reasonable belief that the information and allegation is true and not made with bad intentions for personal gain.

Any disclosure of information will be treated with utmost confidentiality and reports may also be kept anonymous if requested. Be assured that all persons involved in handling the case are also required to maintain the strictest level of confidentiality.



REACHING OUT

Disclosures can be made through ANY of the following reporting channels, in the strictest confidence:

VIA EXTERNAL WHISTLEBLOWING PROVIDER

Attention to Designated Senior Officer, DSO



Via Email

TG@whistleblower.com.my



Via Mail Box

Address

PO BOX #911
L2-08, Level 2, Cheras Leisure Mall,
Jalan Manis 6, Taman Segar,
56100 Kuala Lumpur, Malaysia
Please mark the envelope “Strictly Confidential. To be opened by the addressee ONLY.”

*All disclosures will be treated in the strictest confidence



TOP GLOVE'S CULTURE OF INTEGRITY

Top Glove has consistently cultivated a culture of integrity which has now proliferated among employees within Top Glove. The tone from the top management is clear with several good practices implemented throughout Top Glove’s group of companies:

1. Anti-Corruption Badge & Signage

- ✎ The anti-corruption badge was first introduced in 2006 inspired by the Police (PDRM)’s anti-corruption badge
- ✎ Badges are worn prominently by employees every day
- ✎ Badges are given to all visitors as a souvenir
- ✎ Signages are clearly displayed at the entrance of the corporate tower and each factory



2. Corporate Integrity Pledge

Top Glove was the first to sign the Corporate Integrity Pledge and Anti-Corruption Principles for Corporations, an initiative by the Malaysian government, in March 2011.

Who at Top Glove signed the pledge?

- | | |
|-------------------------------|--|
| ✎ Chairman of Audit Committee | ✎ TGPAC Committee |
| ✎ Executive Chairman | ✎ Executive Directors |
| ✎ Managing Director | ✎ Senior Management / HODs / HOGs / HOFs |





3. Ikrar Bebas Rasuah

Top Glove employees are required to take an oath and sign a pledge every year stating that they will not condone or be involved in any corrupt practices. This is called the Ikrar Bebas Rasuah (IBR). In 2018, we conducted a joint event with the Malaysia Anti-Corruption Commission (MACC) where Top Glove management together with representatives from MACC took the oath and signed the pledge together.







Ikrar Bebas Rasuah Signed Ceremony

4. Letter Enforcement of Corporate Culture, LECC

All Top Glove personnel, suppliers and business associates who have financial dealings with Top Glove are required to sign a Letter of Enforcement of Corporate Culture (LECC) to affirm their adherence to our policy and practice of non-corruption.

Who sign the LECC?

-  Top Glove's Top Management
-  Top Glove's Employees
-  Top Glove's Suppliers
-  Top Glove's Business Associates

5. Letter Enforcement of Corporate Culture & BUSINESS ETHICS ON THE ISSUE OF BRIBERY AND CORRUPTION, LECCBC

All customers are also required to sign the Letter Enforcement of Corporate Culture and Business Ethics on The Issue of Bribery and Corruption (LECCBC) to affirm their adherence to our policy and practice of non-corruption.

6. LETTER ENFORCEMENT OF NO GIFT POLICY, LENGP

This is to uphold the company's No Gift Policy, Top Glove's employees are not allowed to accept or offer PERSONAL GIFTS of any kind, as this may be construed as intending to gain preferential treatment in one's favour.



7. Anti-Corruption Training

Since 2012, Top Glove has been an advocate of anti-corruption practices. A key area for the Group’s training focuses on combating corruption at all levels of the organisation.



8. Business Ethics and Customer Centric Claps

The Business Ethics Clap: conducted before every meeting to remind us to act with integrity at all times

The Customer Centric Clap: conducted by employees after every meeting to focus on customers’ needs and expectations.

TOP GLOVE TOP GLOVE BUSINESS ETHICS CLAPS

Thumbs up, Ready, 1 2 3

- ➔ TOP GLOVE 👍
- ➔ TOP HONESTY 👍
- ➔ TOP INTEGRITY 👍
- ➔ TOP TRANSPARENCY 👍

Claps, 2x 3x 2x

➔ QUALITY ! QUALITY ! QUALITY ! 👍

Initiated By: Tan Sri Dr. Lim Wee Chai @ 15/05/2017
Revised By: Ng Kai Yee @ 21/06/2020
Verified By: Marissa Chan @ 21/06/2020

TOP GLOVE TOP GLOVE CUSTOMER CENTRIC CLAPS

Thumbs Up, Ready, 1 2 3

- ➔ TOP GLOVE 👍
- ➔ Top Quality 👍
- ➔ Top Value 👍
- ➔ Top Service 👍

Claps, 2x 3x 2x

➔ IMPROVE ! IMPROVE ! IMPROVE ! 👍

Initiated By: Tan Sri Dr. Lim Wee Chai @ 15/05/2017
Revised By: Ng Kai Yee @ 21/06/2020
Verified By: Marissa Chan @ 21/06/2020



9. W.H.I.T.E. Integrity Cultures

Top Glove has organised a yearly Anti-Corruption Day since 2012. In 2017, Top Glove collaborated with Transparency International Malaysia to organise the Integrity Talk & Integrity Run that was graced by several VIPs and personalities known for their anti-corruption efforts.

In FY2020, we rebranded our Integrity Day into W.H.I.T.E. Integrity Day which plays a paramount role in strengthening existing ethics cultures in Top Glove.

To cancel white collar crime with W.H.I.T.E.! It is an initiative to fight bribery and corruption by instilling positive values. W.H.I.T.E. can be interpreted as clean, pure and good hearted. It symbolizes integrity and the company's aim to instil a positive corporate culture of sincerity and good ethics within the entire Group. We believe that when our employees practice good values, it will have a major impact in reducing the likelihood of misconduct within the business.

5 Healthy WELLS

W

Clean Well, Eat Well, Work Well, Exercise Well, Sleep Well To incorporate the 5 Quality Wells as recommended by the company's Founder and Executive Chairman, Tan Sri Dr Lim, in order to have a healthy work-life balance. A healthy lifestyle leads to a healthy mind and eventually cleans the heart from corruption and misconduct.

H

HONESTY

Upholding positive moral values at all times

I

INTEGRITY

Do the right thing even when no one is watching

T

TRANSPARENCY

Operating in openness that invites trust from others

E

EDUCATE

Aligned with the company's corporate values, R.I.V.E.R, we add value by educating employees on the importance of having good moral values and refraining from any forms of bribery and corruption.



10. R.I.V.E.R.

Top Glove's new Corporate Values were introduced by our Managing Director, Dato' KM Lee in 2018.



RESPECT

We earn respect by treating everyone with respect



INTEGRITY

We do the right thing everytime



VALUE

We create and add value every day



EMPOWERMENT

We entrust our people with appropriate responsibility



RELATIONSHIP

We foster collaborationn for mutual good

Like a RIVER flows surely to the SEA. Never stopping. Never going in reverse. Always finding its way no matter how many rocks there are. Benefiting others throughout the journey and arriving at the final destination persistently and at peace.



THE KEY TO INTEGRITY: LIVING OUR VALUES



DON'Ts

1. Living lavishly
2. Being snobbish
3. Saying YES to the first proposition
4. Getting too personal with suppliers or external parties
5. Falling prey to compliments
6. Expecting to receive gifts or entertainments

DO's

1. Live within your means
2. Live modestly
3. Have the courage to SAY NO
4. Have the courage to face the truth
5. Do the right thing because it is right
6. Be disciplined in all aspects of life
7. Always uphold the right image & your dignity



"We look for three things when we hire people. We look for intelligence, we look for initiative or energy, and we look for INTEGRITY. And if they don't have the latter the first two will kill you..."

Warren Buffett



CONTACT US

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