

## **11.0 CODE OF BUSINESS CONDUCT**

### **11.1 Policy**

- 11.1.1 The Group is committed to the highest standards of ethical business conduct. This Code of Conduct is binding on all employees, whose actions must always be such as to avoid any Impropriety. In addition, the Group and its employees are subject to the Laws of Malaysia in every respect.
- 11.1.2 The Group will deal only with those organisations having ethical standards compatible with its own declared policy. The employee will report promptly to the Management whenever it knows or is informed by a reliable source, that a client, supplier, subcontractor or other participant (including employees) in a project of the Group is acting illegally or unethically. Employees found to be in breach of these ethical guidelines also will be subject to the Group's disciplinary action.
- 11.1.3 Employees who have any doubts on the appropriate course of action involving matters of business ethics should consult their Head of Department/Subsidiary or the CEO.
- 11.1.4 To ensure that all employees are aware of their ethical obligations, a copy of this Code is provided to all new staff which is to be read and, when fully understood, acknowledged by the employee by signing the attached sheet.

### **11.2 Employee Obligations**

- 11.2.1 Employees are expected to give their best efforts at all times to provide quality service and products. This obligation extends to the protection of the physical and intellectual assets of the Group. Accordingly, employees:
- (a) shall keep confidential all proprietary information of the Group, which includes commercial and human resource data, design and intellectual property of all forms;
  - (b) shall not speak to the media or publish anything about the Group business unless authorised;
  - (c) shall inform the CEO or the Head of Department/Subsidiary about breaches of the law and safety matters as soon as they become aware of them;
  - (d) must use the resources of the Group only for relevant business purposes. This applies both to physical (e.g. materials) and non-physical resources (e.g. software, intellectual property, etc);
  - (e) shall keep accurate and sufficient records organised in a manner so as to inform fairly and honestly those who receive (or have use for) the information, in the conduct of the Group business; and
  - (f) shall observe established delegation of financial and personnel authorisations.

### **11.3 Integrity of Business Practices**

11.3.1 Employees of the Group in doing business with any organisation must adhere to the following standards:

- (a) employees must deal fairly and equitably with their colleagues and external contacts;
- (b) employees must not misrepresent themselves or the Group to anyone;
- (c) employees must not engage in any 'collusive' practices which may lead to the Group receiving less than a fair and competitive services or products;
- (d) unauthorised copying or use of software and other data or documentation can result in criminal liabilities. The improper use of such proprietary information is strictly forbidden;
- (e) gifts and entertainment shall not be offered or accepted where there is any obligation incurred or such offer or acceptance can be construed as a bribe.
- (f) entertainment in the form of customary business amenities such as meals with associated drinks may be accepted or offered provided it is not unduly lavish or frequent;
- (g) the Group will meet all the employees' reasonable business expenses such as travel, food and accommodation and should not accept any such offer from suppliers unless at the supplier's facilities or otherwise unavailable through normal commercial sources.

### **11.4 Personal Behaviour**

11.4.1 The personal behaviour of employees should reflect the ethical standards of the Group and respect the rights of the Group to your services as an employee. A conflict of interest exists if an employee has any interests or activities held outside the Group that may be advanced at the expense of the Group.

11.4.2 The test to be applied is whether the combination of your job, the form and amount of external investment and the external Group's structure and involvement with the Group could influence your actions as an employee of the Group. In particular:

- (a) your external personal activities must not give rise to real or perceived conflicts of interest. Should any such occasion arise you must declare any interest openly and abstain from the decision-making process;
- (b) employees may not perform services in competition with the Group either alone or in conjunction with another group or person without the prior consent of the Group;
- (c) you must not use inside information, confidential material or non-public information for your own financial benefit either directly or indirectly. In addition to being a violation of law, it will be grounds for instant dismissal;
- (d) you may not perform outside work or solicit non-Group business on Group premises or in Group time nor may you use the Group's resources for outside work;
- (e) you may not use your association with the Group to sponsor, endorse or advance the interests of another organisation except where you have the prior written consent of the CEO;
- (f) employees may not accept nor may they offer money or any other benefit or advantage in the performance of their duties other than as part of a recognised commission or payment scheme which is available to all suppliers or providers;
- (g) employees should not borrow from or lend money to customers, suppliers or contractors of the Group.

### **11.5 Breach of Conduct**

The Group recognise that a breach of ethical business behaviour may cause adverse impact on its reputation and business operations. Accordingly, the Group will regard any breach of these ethical guidelines by employees in the most serious manner and implement immediate disciplinary action or dismissal.

### **11.6 Conflict of Interest**

11.6.1 As an employee of the Group, you should avoid situations where your own interests conflict with the best interests of the Group, or may appear to someone else to do so.

11.6.2 A conflict of interest may occur, for instance, if you or a member of your immediate family or a business or other group with which you are associated would be affected materially by decisions you make as part of the Group's responsibility. Or, a conflict might occur if you or a family member or associate stood to gain from the confidential information to which you have access as part of your job. A clear case of conflict arises if you accept gifts or valuable favours from individuals or firms doing or wanting to do business with the Group or attempting to influence some the Group's decision.

11.6.3 If you are in a conflict of interest situation, or think you may be, discuss it with your supervisor in confidence. You can also discuss the situation with the HR Department.

### **11.7 Gift Pre-requisites And Entertainment**

For an employee to accept commissions, a share in profits, gifts in cash, gift certificates, travel or other payments, materials, services, repairs or improvements at no cost or at unreasonably low prices, excessive or extravagant entertainment or gifts of merchandise of more than nominal value from any organisation, firm or individual doing or seeking to do business with the Group or any of its affiliate/subsidiary without prior notice to the HR Department may seem to be committing a major offence.

### **11.8 Utilisation of Information Technology**

11.8.1 All employees shall observe the following Information Technology guideline at all times while in the employment of the Group and the Group reserves the right to institute disciplinary action or institute grievance procedures for any breach of the Code or where the breach constitutes a serious misconduct, the Group reserves the right to dismiss any employee.

- 11.8.2 To object and use facilities for the purposes for which the employee is authorised. Violations include:
- (a) install your own software on the Group's computing resources;
  - (b) installing illegal licensed software which is not meant to reside on the Group's computing facilities which is assigned to you;
  - (c) using another person's account or attempting to capture other users' passwords without consent;
  - (d) circumventing normal resource limits, log on procedures and security regulations;
  - (e) trying to obscure your true identity as the sender of electronic mail;
  - (f) using the Group's computing resources for commercial purposes; and
  - (g) using the Group's computing resources to harass, intimidate or threaten other users.
- 11.8.3 To respect the privacy of other users at all times. Files, disks, electronic mail, information, programs and data owned by individual users should be considered private, whether or not the information is accessible by other users. Tampering with electronic mail, interfering with or intercepting its delivery and using electronic mail for criminal purposes may be criminal offences.
- 11.8.4 At all times respect the rights of others to make use of the Group's computing resources. Violations include:
- (a) placing obscene or harassing material in areas that can be/are publicly accessed;
  - (b) sending/forwarding chain letters or deliberately flooding a user with automatically generated mail;
  - (c) distributing information not intended for distribution by owner;
  - (d) printing or sending excessive copies of documents, files, data or programs;
  - (e) attempting to modify or remove computer equipment;
  - (f) attempting to degrade or disrupt system security or performance; and
  - (g) damaging or vandalizing Group's computing facilities, equipment, software or computer files.
- 11.8.5 At all times faithfully and diligently obey and comply with respect appropriate copyright laws, licenses, confidentiality and trade secret agreements. Much of the software and data that resides on the Group's computer facilities is protected by copyright laws and license agreements from the owner of the copyright. The number of copies and distribution of the copies may not be done in such a way that the number of simultaneous users exceeds the number allowed.
- 11.8.6 At all times obey and comply with the established guidelines for any networks or systems used inside or outside the Group. Accessing computer, software, data or information, or networks without proper authorization, regardless of whether any damage is done or whether the computer, software, data, information, or network in question is owned by the Group, will be deemed as an abuse of your Group's computing privileges.
- 11.8.7 An employee who is authorised to add or delete files from a hard drive of a Group's computer must take reasonable and appropriate steps to see that all license agreements are faithfully executed on all systems, networks and servers for which they have responsibility.

- 11.8.8 An employee must take reasonable precautions to guard against corruption of data or software or damage to hardware or facilities of the Group and must treat information about and information stored by the system's users as confidential.
- 11.8.9 Where there is an indication that misuse has occurred, the alleged offence is to be reported immediately by the employee to the Group for investigation and the Group may restrict a user's computing privileges.
- 11.8.10 An employee who is found abusing with the Group's computing resources may also be liable for civil or criminal prosecution. An employee should observe strictly that nothing in this Information Technology guideline can preclude enforcement by the Group under the laws and regulations.
- 11.8.11 Not at any time during the continuance employment with the Group attempt to authenticate another computer user.
- 11.8.12 Not any time during the continuance employment with the Group play games on computers.
- 11.8.13 Not any time during the continuance employment with the Group provide content(s), which violates copyright or trademark laws. All software must be secured to prevent copying except that which explicitly allows copying, such as public domain software. It is the employee's responsibility to know what the copyright laws are.
- 11.8.14 The employee is not allowed to run a business or charge any money for access, contents or usage of their server. Any financial transaction is in direct violation of the Group's policies and may result in legal action.