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SECTION 8: BUSINESS ETHICS

8.1 IT SOFTWARE POLICY

- 8.1.1 Employees are required to use the Company's IT systems responsibly and primarily for the business purposes of the Company for which they are intended to.
- 8.1.2 Any employees who uses the Company's IT systems for personal reasons must apply high ethical standards, comply with applicable laws and regulations and support the Company's information security requirements.
- 8.1.3 The Company requires all employees to play an active role to ensure that all approved IT projects are completed successfully within the budget and deadline.
- 8.1.4 The Company purchases all of its computer hardware with adequate warranty and guarantee coverage. Hence, any unauthorized repair of the computer hardware is strictly prohibited by the Company.
- 8.1.5 Malware refers to a variety of harmful or intrusive software designed to infiltrate or damage a computer system without the owner's informed consent. The Company equips all of its computers with malware-detection software that will scan all users' email and internet activities for viruses, worms, spyware, adware, Trojan horses and other malicious software. Employees should not, at any time, UNINSTALL or DISABLE the malware-detection software on their respective computer.
- 8.1.6 For the purpose of this subsection, employees are strictly prohibited from the following actions, unless express approval from the IT Manager or the Company has been obtained first:
- Duplicating any licensed software or related documentation for use, either on the Company's premises or elsewhere;
 - Downloading software and/or applications from the Internet;
 - Distribute any software to any third parties, including contractors or clients;
 - Bringing any software from home to be loaded onto the Company's computers; and
 - Any other actions deemed unreasonable by the IT Manager which may cause harm to the Company.
- 8.1.7 The use of the Company's IT systems may be monitored for the purposes of information security, operational management, maintenance, business needs and to ensure that all use is compliant with all laws, regulation and the Company's policies.
- 8.1.8 Employees shall not access any system, application, information and data that are not intended for their viewing.
- 8.1.9 Employees must ensure that they have taken all necessary precautionary measures to safeguard the information which they create, receive, send or control (including the facilities that they are using to do so).
- 8.1.10 Employees must notify their respective HOD, immediate supervisor and/or the IT Manager of any misuse or potential misuse of software, Internet and e-mail within the Company.
- 8.1.11 Employees must notify their respective HOD, immediate supervisor and/or the IT Manager of any observed or


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suspected security weaknesses and/or breaches to the systems.

- 8.1.12 The IT Manager may conduct random audits on all of the Company's computers, from time to time, in order to ensure that the Company is in compliance with all software licenses.

8.2 INTERNET AND E-MAILS USAGE

- 8.2.1 All computers, e-mails, phones or other electronic and telephonic media in the Company are the sole property of the Company.
- 8.2.2 Employees may use the internet, when appropriate, to access the information needed for the proper course of their duties in the Company.
- 8.2.3 The use of the internet must not disrupt any operation of the Company's computer network and/or interfere with any of the employee's productivity.
- 8.2.4 Employees are responsible for using the internet in a manner that is both ethical and lawful as internet messages are considered public and not private.
- 8.2.5 The Company will ensure that every employee shall be given with his or her own personal e-mail account required for work. For every new recruit, the Human Resources Department will liaise with the IT Department to request for a specific user account for the said recruit. In the event the employee has ceased employment with the Company, the Human Resources Department must immediately notify the IT Department of the same in order to re-route or terminate the account of the said employee.
- 8.2.6 The Company requires all employees to observe and adhere to the following, when using their respective e-mails:
- The e-mails may only be used when appropriate, for the purpose of the Company's business correspondence and not intended for private use;
 - Employees should only use, in their respective emails, the approved e-mail signature of the Company;
 - E-mail password and Computer User password should be treated with high importance due to its confidential nature;
 - Employees should never disclose their e-mail password and Computer User password to anyone, at all times;
 - Employees are prohibited from committing forgery or attempted forgery of e-mails
- 8.2.7 All access codes or passwords must be made available to the Company.
- 8.2.8 The Company at all times reserves the right to access and monitor all files and messages on its systems as well as monitoring the manner in which the equipment is being used by the employees.
- 8.2.9 Any employees found using the Company's computers and internet to access immoral, unethical or non-business related internet sites (gambling sites, pornographic sites, hate sites and any other sites engaging in encouraging illegal activities) will be subject to corrective action and/or disciplinary action, including termination.

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8.3 ABUSE OF INTERNET AND E-MAILS

8.3.1 The Company strictly prohibits the abuse of internet and e-mails usage as follows:

- a) Dissemination or printing of copyrighted materials, including but not limited to articles and software which are in violation of applicable copyright laws;
- b) Sending, receiving, printing or otherwise disseminating proprietary data, trade secrets or any other confidential information of the Company which is in violation of Company policies and/or proprietary agreements;
- c) Sending or soliciting sexually oriented messages or images;
- d) Operating a business, usurping business opportunities, soliciting money for personal gain and/or searching for jobs outside of the Company;
- e) Sending chain letters;
- f) Gambling or engaging in any other activities in violation of applicable laws;
- g) Circulating jokes, comics or non-job related computer graphics and/or accessing websites which is not related to the Company's business; and
- h) Soliciting or distributing information of a non-business nature during work time or using the Company's equipment, including but not limited to invitations to social events, any advertisements, and communication seeking to obtain support for, agreement with, or participation in an outside group, organization, cause or activity and advertisement for personal business.

8.3.2 The Company views the abuse of internet and e-mails as a major misconduct and shall not hesitate to impose severe corrective and/or disciplinary action, including suspension or termination of employment.

8.4 INTELLECTUAL PROPERTY


8.4.1 Intellectual property rights includes copyright, patent rights, database rights, trademarks and service marks in all inventions, documents, logos, designs and computer programs created, devised or undertaken by the Company's employees during the course of their employment.

8.4.2 The Company is committed to respect the valid intellectual property rights of third parties and will not knowingly infringe such rights.

8.4.3 It is the Company's management general duty to ensure that all relevant contracts of employment or contracts for services provide for the ownership of the relevant intellectual property rights by the Company.

8.4.4 The Company will own all the intellectual property conceived, created or developed by employees during the course of their employment with the Company. The said intellectual property shall remain as the sole and exclusive property of the Company.

8.4.5 Employees are not entitled for any payment with respect to the intellectual property conceived, created or developed during their employment with the Company except for any ex-gratia payment which is subject to the Company's sole discretion on the same.

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8.4.6 Except in the proper course of their duties (to which they have been authorized to do so by the Company), employees shall not disclose any of the Company's intellectual property to third parties, unless they have obtained express approval from the Company to do so.

8.4.7 Employees' obligations with respect to non-disclosure of intellectual property as contained in the policy herein shall continue after the cessation of their employment with the Company and be enforceable against the employees by the Company at all times.

8.5 CONFIDENTIALITY

8.5.1 The Company is committed to comply with the provisions of confidentiality undertakings which they enter into, including those relating to potential acquisition targets, divestments, joint ventures, collaboration arrangements or other potential business opportunities.

8.5.2 Confidential information shall be broadly defined as technical information concerning products and services, manufacturing and development process information, engineering designs, drawings and layouts, software code, know-how, pending patent applications, invention disclosure statements. For the purpose of this subsection, confidential information will also include non-public business information such as non-public financial information, employee information (including e-mail lists), analyses, forecast, customer and supplier lists, strategic and operating plans, corporate organization, audit materials or reports, legal opinions and advice, information regarding litigation or potential litigation, proposed transactions and the like.


8.5.3 Employees must not disclose to third parties any confidential information and/or non-public material, without first obtaining the express approval from the Company. The release of any confidential and/or non-public material to third parties (whether intention or inadvertent), may damage the reputation of the Company and in some cases violates applicable law.

8.5.4 If in the proper course of the employees' duties, they are required to disclose such confidential information with third parties, such disclosure must only occur with the protection of non-disclosure agreement. Such agreement can be provided by the Legal Department.

8.5.5 All documents, data and/or other requisites (confidential or otherwise), acquired, received or made by any employees during the course of their employment with the Company and pertaining to the business of the Company, must be surrendered back to the Company upon cessation of their employment with the Company or at the request of the Company at any time during the course of their employment.

8.5.6 If an employee receives any files, emails, documents or pen drive whereby he or she is not the intended recipient, such files, emails, documents or pen drive must not be opened, read, copied, distributed, forwarded or meddled in any way by the said employee.

8.5.7 The Company views non-adherence by any employees to the Confidentiality policy as contained herein as a major misconduct and will not hesitate to impose severe corrective action and/or disciplinary action, including suspension or termination of employment.


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8.6 INSIDE INFORMATION AND INSIDER DEALING

- 8.6.1 "Inside information" can be defined as information that is generally not available to the public that if it is disclosed to the public, could affect the market price of the Company's shares (or those of the Company's clients).
- 8.6.2 All employees are responsible to protect the inside information of the Company and never use it for their own benefit, especially, in matters pertaining to the trading of the Company's shares or other securities, nor disclose that information to any third party who might use it to deal in such shares or encourage any third party to carry out any dealing in such shares.
- 8.6.3 Employees who are holders of insider information pertinent to the Company's share price are allowed to utilize or divulge such information (either directly or indirectly) to other individuals, in the proper course of their duties for the Company, upon obtaining an approval from their respective HOD or immediate supervisor first.
- 8.6.4 Any employee who uses, or disclose insider information to any third party who might use it to deal in the Company's shares or encourages any third party to carry out any dealing in such shares shall be deemed to have committed insider dealing which is a breach of the law.
- 8.6.5 The Company views non-adherence by any employees to the Insider Information and Insider Trading policy as contained herein as a major misconduct and will not hesitate to impose severe corrective action and/or disciplinary action, including suspension, termination of employment and/or seek legal remedy from the injury or loss suffered by the Company whether through direct or indirect means.

8.7 CONFLICT OF INTEREST

- 8.7.1 The Company prohibits any activity that creates a conflict between the employees' duties to the Company (including its approved affiliates) and the employees' private interests, including but not limited to their personal, financial, proprietary, familiar or political gains. The term 'familiar' here includes parents, children, siblings and spouse.
- 8.7.2 A 'conflict of interest' exists when any of the following situations occurs:
- Employee misuses or creates the appearance of misusing their position in the Company for their own personal advantage which is unauthorized and/or not for the best interest of the Company;
 - When there is a conflict between the employees' duties to the Company and their own personal interests, in which the said employee could improperly influence the performance of their official duties (such as conducting assessment and the like) and responsibilities for the benefit of third parties (such as the clients of the Company and the like);
 - If a person, or any entity or individual having a significant relationship with the employee of the Company, and such persons may benefit from any information considered by the Company to be confidential in nature whereby the said employee have learned of such confidential information during his or her course of employment with the Company;
 - Employee having significant financial interest in the Company's clients, suppliers or competitors;
 - Employee working for the Company's competitor or self-employed, while knowingly being in competition with

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- the Company; and
- f) Employee soliciting or accepting gifts or gratuities from the Company's clients or suppliers.

8.7.3 Any employee who has the power to influence approval or disapproval of a transaction proposed to be entered into between the Company and any other person, individual, company or entity through a significant relationship with the latter, shall not participate in any way, the process leading to the approval or disapproval of the transaction (i.e. including conducting assessment of customers or participants unless the underlying facts giving rise to the potential conflict of interest are disclosed and approval for participation is obtained.

8.7.4 All employees are required to disclose to the Company of any existing conflict or potential conflict as stipulated in their respective employment contract. Any employee who believes there is an existing conflict or potential conflict as stipulated herein must immediately disclose the same in writing to their respective HOD and/or immediate supervisor who will in return inform the Human Resources Department of such information.

8.7.5 The Company views non-adherence by any employees to the Conflict of Interest policy as contained herein as a major misconduct and will not hesitate to impose severe disciplinary action, including suspension, termination of employment and/or seek legal remedy from the injury or loss suffered by the Company whether through direct or indirect means.

8.8 NON-COMPETE

8.8.1 Employee shall not at any time (whether during their period of employment and/or within one year after the termination of their employment with the Company), directly or indirectly, entice, divert or interfere with any of the existing or potential principals, clients or business contacts of the Company.

8.8.2 Employees shall not at any time (whether during their period of employment and/or within one year after the termination of their employment with the Company), directly or indirectly, entice any of the Company's existing employees to join another Company which operate and deals in similar products and/or services to the Company.


8.9 COMPETITION AND ANTITRUST

8.9.1 The Company is committed to ensure compliance with all applicable Competition and Antitrust laws.

8.9.2 The Company is aware that any attempt to manipulate a competitive bidding process may be viewed as anti-competitive behavior and that Competition laws prohibit such behavior which carries severe penalties for non-compliance.

8.9.3 All employees are required to observe and comply with the following:

- a) Ensure that they are aware with all applicable Competition and Antitrust laws;
- b) Maintaining independence in all aspects of a bidding decision;
- c) Keeping records of any meetings, conversations and dealings with the Company's competitors; and

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- d) Avoid being involved in any anti-competitive market and/or competitor-sensitive matters that are being discussed with anyone.

8.9.4 For the purpose of this subsection, the Company strictly prohibits any employees from committing any of the following acts:

- a) Exchanging information with the Company's competitors to fix prices, credit terms or market share;
- b) Discussing any aspect of a tender with the Company's competitors;
- c) Gaining information about the Company's competitors through illegal means (i.e. bribery, theft, misrepresentation and etc.);
- d) Using any information of the Company's competitors which have been obtained through a mistake; and
- e) Accepting any information from third parties which is known or have a reason to believe has been obtained improperly.

8.10 AGENTS AND THIRD PARTIES

- 8.10.1 The Company is aware that the business practices and/or conditions in other countries requires the use of agents or similar third party representatives to represent the Company's interests.
- 8.10.2 The Company is committed in ensuring that all agents and similar third party representatives are carefully checked before being chosen as the Company is aware that any improper conduct could damage the Company's reputation and may further implicate the Company with legal liabilities.
- 8.10.3 Before their respective appointments, all agents and similar third party representatives must be given a copy of the Company's Code of Conduct and Business Ethics policy by the Human Resources Department and be asked to confirm in writing of their acceptance and compliance of the said policies.
- 8.10.4 The Company will ensure that every agreements with any agents and similar third party representatives shall expressly state the prohibition of any improper and/or illegal payments to be made to the Company's potential clients, government officials and the like, including any form of facilitation payment.
- 8.10.5 In the event whereby the Company's appointed agents and similar third party representatives is in breach with the Code of Conduct and/or Business Ethics as contained herein, especially on the Anti-Bribery and Corruption policies, the Company will immediately terminate the agreements with them and/or seek remedy from the injury or loss suffered by the Company due to such breach. The appointment of any agents or similar third party representatives to represent the Company's interests shall only be considered valid upon the execution of the Company's Agency Agreement which is signed by the authorized representatives of both parties.

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8.11 GIFTS AND ENTERTAINMENT

8.11.1. It is the Company's general policy to not offer or accept any form of gift or entertainment from the following parties:

- i. Clients of the Company;
- ii. Suppliers or contractors of the Company;
- iii. Any other person, company or entity which is currently having or potentially be in business with the Company;

If, the gift or entertainment is worth more than the nominal value.

8.11.2. For the purpose of this subsection, nominal value is defined as an amount not exceeding RM500.00.

8.11.3. The company is aware that there will be circumstances whereby it is culturally appropriate to receive/offer gifts and/or entertainment for business purposes which may exceed the nominal value as set forth herein. Under such circumstances, for received gift or entertainment, employees are required to complete the **Declaration & Acknowledge Receipt Form (FORM-GEN-10)** and submit the form to Human Resources Department.

8.11.4. Any offering in form of gift or entertainment exceeding the nominal value, employee are required to complete **Local Business Meals Entertainment (FORM-GEN-006)** and submit the form to the Human Resources Department.

8.12 ANTI-MONEY LAUNDERING

8.12.1 For the purpose of this subsection, money laundering occurs when legitimate funds are used to support illegal activities or the concealment of illegally obtained funds in legitimate business.


8.12.2 The Company is committed to ensuring compliance with all applicable anti-money laundering laws by only conducting business with reputable suppliers, agents, third party representatives and clients who are all involved in legitimate business activities with funds derived from legitimate resources.

8.12.3 The Company shall conduct adequate due diligence on all suppliers, agents, third party representatives and clients on their business background before getting into any business relationships with them.

8.12.4 Employees are required to report any suspicious transaction or money laundering activities that they are aware of to the Company immediately. Failure to do adhere to the Anti-Money Laundering policy contained herein shall be considered a major misconduct.

8.13 SPONSORING AND CHARITABLE DONATIONS


8.13.1 The Company may utilize sponsorships to promote the Company and its business whereby all sponsoring relationships shall be made strategically and aligns with the Company's values.

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- 8.13.2 All tangible benefits (i.e. commercial gain, professional development, enhanced profiling and etc.) from sponsoring relationship shall be documented.
- 8.13.3 The Company will not sponsor any religious or political groups or organizations as it is the Company's policy to avoid any personal conflict of interest with respect to sponsoring an organization.
- 8.13.4 The Company may be involved in charitable donations to organizations which do not carry the same requirement for mutual benefit but will refrain itself from making any charitable donations to religious or political groups or organization.
- 8.13.5 All sponsoring and charitable donations must be approved by the CEO first.

8.14 ANTI-BRIBERY AND CORRUPTION

- 8.14.1 The Company is committed to abiding by applicable laws and is against any form of bribery and/or corruption.
- 8.14.2 For the purpose of this subsection, bribery is defined as the offer or acceptance of a financial gain or any other form of benefit, with the sole intention of influencing the recipient of the benefit to act improperly or unfairly in the award of the business or in the execution of their duties while corruption can be defined as dishonest or fraudulent conduct by those in power.
- 8.14.3 All employees are prohibited from committing any of the following acts which is deemed by the Company as bribery and/or corruption:
- Paying any individuals with the authority or influence over the award of business in order to influence them to make an award in favor of the Company.
 - Exchanging expensive gifts or providing lavish entertainment to any individuals with the intention of influencing the award of business to the Company.
 - Making political or charitable donations to a third party, their family member(s) and/or close associate(s) with the intention of unfairly influencing the award of business to the Company.
 - Accepting payments or other inducements from third parties, including but not limited to, agents, vendors, suppliers, service providers or sub-contractors in order to award business or grant another benefit to them.
 - Manipulating tender procedures to award a contract to a specific to a specific vendor, sub-contractor and/or service provider in return for some form of payment or other benefit.
 - Offering payments or other form of benefits, whether directly or indirectly, to a tax, customs or immigrations official to overlook local taxation, customs or visa requirements.
- 8.14.4 The Company is committed to ensuring that all award of business, whether obtained or given to, shall be done with full transparency, legally and without any connection to bribery or corruption by following an established, documented and communicated tendering process
- 8.14.5 The Company shall conduct adequate, risk-based due diligence on all third party relationships in order to determine the level of risk associated with the specific third party and that appropriate mitigation plans are put in place in order to


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mitigate any identified risks.

- 8.14.6 The Company is aware that there will be circumstances whereby it is culturally appropriate to receive gifts and/or entertainment for business purposes, provided that they are not intended to unfairly influence or could be perceived as unfairly influencing the award of business to or by the Company.
- 8.14.7 For the purpose of this subsection, facilitation payments can be defined as unofficial payments made to public authorities to obtain or speed up routine services which those authorities are required to provide without making such payment. The Company is aware that facilitation payments are illegal in most countries and therefore prohibits any form of facilitation payments, whether directly or indirectly through a third party, as they may be deemed as a form of bribery and/or corruption.
- 8.14.8 For the purpose of this subsection, as per subsection 8.13, the Company prohibits any employees, agents and/or third party representatives from making any political contributions (whether directly or indirectly) under the Company's name or using the Company's funds and/or resources for this purpose. They are however, not prohibited by the Company, to make political contributions in their personal capacities – provided that there is no intention to gain a commercial advantage for the Company in the process of making such political contributions.
- 8.14.9 In order to ensure compliance to the Anti-Bribery and Corruption policy contained herein, the Company shall maintain proper records and documentation of all transactions.
- 8.14.10 Employees are required to immediately report to the Company if they suspect any instances of bribery and/or corruption, whether it is with respect to a fellow colleague, an agent or third party representatives of the Company in regards to the Company's business. Any suspected instances should be immediately reported by the employees to their immediate supervisor if the allegation does not relate to their immediate supervisor. If it does, they may report to their respective HOD, Legal Department or alternatively, submit their report via the Company's Whistleblowing policy as contained herein.

8.15 WHISTLEBLOWING

- 8.15.1 Whistleblowing can be defined as the deliberate, voluntary disclosure or reporting of an individual or organizational malpractice by anyone who has or had privilege to access data, events or information about an actual, suspected or anticipated misconduct within the Company or by the Company that is within its ability to control while a Whistleblower refers to an individual who exercised their whistleblowing right.
- 8.15.2 For the purpose of this subsection, the process to lodge a report of misconduct shall be as follows:
- i. By Employees:
 - a) Employees are advised and urged to report any misconduct as soon as they discovers the commission or an intended commission of any misconduct or they were instructed to participate in any misconduct.
 - b) Employees shall lodge the report of misconduct in writing, using **Whistleblowing Forms (FORM-GEN-011)**. The said report must provide full details of the misconduct and where possible, with supporting evidence.

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- c) The report of misconduct must be made directly to the Human Resources Department and shall be submitted in a sealed envelope marked "Confidential" while being addressed to the Human Resources Manager.
- d) The Human Resources Manager shall then proceed with the Investigation Procedure as contained in the policy herein.

ii. By External Parties (Non-Employees)

- a) The procedure for an external party to report any misconduct by an employee of the Company shall be posted on the Company's official website. The procedure shall include **Whistleblowing Forms (FORM-GEN-011)** for reports of misconduct to be made.
- b) The Human Resources Department, upon receiving any report from an external party, shall proceed with the Investigation Procedure as contained in the policy herein.

iii. By Anonymous

- a) Anonymous reports are not encouraged by the Company as any follow up to ascertain the facts or to obtain further information for investigation purposes would be much more difficult.
- b) Although the Company is not expected to address any anonymous allegations, the Company may, however, considering investigating an anonymous allegation after having considered the following:
 - The seriousness of the concern;
 - The credibility of the concern; and
 - The likelihood of confirming the concern from credible sources.


8.15.3 The Investigation Procedure shall be conducted as follows:

a) **Report of Misconduct Logbook**

- i. All reports of misconduct, findings of investigations, monitoring, corrective actions and/or disciplinary actions shall be centralized and logged in a log administered and monitored by the Human Resources Department. The Human Resources Department may review the logbook at any time.
- ii. The CEO shall be kept informed on any new reports of misconduct reported where the CEO is not implicated (to the extent possible, without disclosure of identities of the Whistleblower and the person that allegedly committed that misconduct) so that any interim corrective and/or disciplinary measure (if applicable) regarding any misconduct can be taken immediately.
- iii. After receiving a report of misconduct, the Human Resources Department will hold a meeting to decide on whether the case is a frivolous claim or that it has reasonable suspicious circumstances attached to it. The report will first be forwarded to the CEO for his or her input before logging it into the logbook.
- iv. Only upon receiving the CEO approval will the Human Resources Department proceed with the preliminary investigations of the alleged misconduct reported.

b) **Investigation Procedure**

- i. Upon logging a report of misconduct, the Human Resources Department will provide the Whistleblower an acknowledgement of receipt of the report of the misconduct within two (2) working days of receipt.
- ii. Subsequently, if necessary, the following person may be consulted (to the extent possible, without disclosure of identities of the Whistleblower and the person allegedly committed the misconduct) to

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assist and to provide relevant advice in relation to their respective areas:


- A breach of any Law – Head, Legal Department
- A breach of the Code of Ethics – Head, Human Resources Department
- A breach of the Corporate Fraud Policy – Head, Legal Department

c) Preliminary Investigation Process

- i. The Human Resources Department will conduct a preliminary investigation of every report of misconduct received to determine whether there are merits to initiate a full investigation.
- ii. The findings of the preliminary investigation and recommendation shall be referred to the Head of the Human Resources Department for a decision on whether to close the case or to proceed with a full investigation of the alleged misconducts. Both Human Resources and Corporate Services Department shall hold a meeting before making the said decision.
- iii. Upon review of the preliminary findings, the Human Resources Department may:
 - Instruct the matter to be closed in the event the preliminary findings clearly indicate that there are no circumstances that warrant a full investigation; or
 - Commence a full investigation in the event the preliminary findings clearly indicate suspicious circumstances (and where the CEO is not involved). The Human Resources Department will delegate the oversight of the investigation and review the results of the investigation with the CEO; or
 - In such cases where the report involves the CEO or the Board of Directors, the Human Resources Department may select other personnel (having due regard to suitable seniority and any circumstances that may give rise to conflicts of interest) or an independent party to investigate the allegations; or
 - In cases where the preliminary findings discloses a possible criminal offence, the Human Resources Department and legal advisors (internal and/or external) will decide whether the matter should be referred to the relevant authorities, such as the police or the Malaysia Anti-Corruption Commission (“**MACC**”) for further action; or
 - Hold a meeting between the Human Resources and Corporate Services Departments to determine any other course of action that is deemed fit, while having regard to the circumstances of the matter reported and the fairness of the conduct of any investigation.
- iv. If the case is closed, the Human Resources Department will inform the Whistleblower that the matter is closed.
- v. If the matter is to be referred to the authorities, subject to any legal requirements or prohibitions, the Human Resources Department will inform the Whistleblower that the matter has been referred to the authorities.
- vi. In the event a full investigation is to be carried out, the Human Resources Department will inform the Whistleblower shall give his or her full cooperation during the conduct of the investigation.

d) Full Investigation Process

- i. In the event a full investigation is to be conducted, the Human Resources Department and/or other persons appointed by the Human Resources Department shall conduct the investigation and endeavor

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to complete such investigation within two (2) months. Any extension of time required for the completion of the investigation shall be subject to the CEO's approval.


- ii. In the event a full investigation is being conducted, all employees shall give their full cooperation to any investigation conducted.
- iii. In the event a full investigation is to be conducted on a report of misconduct by the CEO or the Board of Directors and the Human Resources Department decides to appoint an external independent party to conduct or to assist in conducting the investigation, the terms of appointment of the said external independent party shall be approved by the Human Resources Department.
- iv. All information, documents, records and reports relating to the investigation of the misconduct shall be kept securely to ensure its confidentiality.

e) Findings of Investigation

- i. Upon the conclusion of an investigation (in a case where the CEO is not implicated), the investigation report shall be reviewed by the CEO.
- ii. Upon the review of such investigation report, the CEO shall determine whether the allegation could be substantiated or not. In the event the allegation is substantiated, the CEO will identify and recommend the corrective action to be taken to mitigate the risks of such misconduct recurring and recommend if disciplinary action is to be taken against the wrongdoer.
- iii. Upon the conclusion of an investigation in a case where the CEO or the Boards of Directors is implicated, the Human Resources Department shall review the investigation report. Upon the review of such investigation report, the Human Resources Department shall determine whether the allegation could be substantiated or not. In the event the allegation could be substantiated, the Human Resources Department will identify and recommend the corrective action to be taken to mitigate the risks of such misconduct recurring and recommend if disciplinary action is to be taken against the wrongdoer.

f) Decisions

- i. In a case whereby the CEO reviewed the investigation and made a determination whether the allegation was substantiated or not, a final report together with the CEO's recommendation will be tabled by the Human Resources Department. The Human Resources Department will then review the final report, taking into consideration the CEO's input, and proceed to execute the corrective action and/or disciplinary action to be taken (if any) as stipulated under **Section 9 – Counseling, Corrective Action and Disciplinary Action** herein.
- ii. In a case whereby the Human Resources Department reviewed the investigation and made a determination whether the allegation was substantiated or not, a final report with the recommendations of the Human Resources Department will be tabled to the Board of Directors. The Board of Directors will review the final report and decide on the corrective action and/or disciplinary action to be taken (if any) as stipulated under **Section 9 – Counseling, Corrective Action and Disciplinary Action** herein.
- iii. Subject to any prohibition in law or any legal requirements, the Human Resources Department will inform the Whistleblower that the investigation has been completed and the findings, as the case may be. As the findings are confidential, the details of the findings may not be disclosed to the Whistleblower (depending on a case by case basis).

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