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7.0 CODE OF CONDUCT

7.1 EMPLOYEE RESPONSIBILITIES

- 7.1.1 All employees must be given the latest version of the Employee Handbook and the Human Resources Department to ensure that it is being provided to the employees
- 7.1.2 All employee must have read and familiarize themselves with the Code of conduct and Business Ethics. This shall be enforced by having employee to sign a **“Declaration of Acceptance and Understanding of Employee Handbook” form (FORM-GEN-008)** stating that they have received, read and understood the said policies.
- 7.1.3 All employee to read and familiarize themselves with the Company’s Core Values and Brand Promises And Human Resources Department to ensure it is being provided to the employees.
- 7.1.4 All employees are expected to faithfully and diligently perform the duties assigned, promptly carry out all instructions given and accept such responsibilities as may be assigned to them from time to time.
- 7.1.5 All employees are expected to faithfully observe all the rules, regulations, procedures, practices and policies of the Company (whether express, implied or statutory).
- 7.1.6 The work rules and standards of conduct for the Company are important and the Company regards them seriously. Employees are expected to follow the rules and standards faithfully in doing their own jobs and conducting the Company’s business. The employees should at all times be polite and courteous in all dealings, whether with an employee of the Company or any clients of the Company.
- 7.1.7 Employees shall not act beyond the authority given in the ordinary performance of assigned duties without prior specific instruction from the Company.
- 7.1.8 Employees are not allowed at any time during their employment with the Company to engage directly or indirectly in any other outside business, suppliers and stakeholders or occupation whatsoever, without the prior written approval of the CEO. The said approval shall only be granted to certain employee by the CEO, based on a case by case basis.
- 7.1.9 All employees are responsible to safeguard and protect the assets of the Company.
- 7.1.10 Employees shall not by any means (either orally or in writing) make any public statements on the business, policies, decisions or release any information deemed confidential of the Company without the express approval from the Company.
- 7.1.11 All employees are expected to ensure that their personal appearance are maintained in a manner suited to a formal business environment (Plant operation workers are required to wear the designated Personal Protective Clothing (PPC) under the Personal Protective Equipment (PPE) policy at the job sites and at all time during their working hours). Clothing such as jeans and Company tee-shirts are allowed strictly based on the Company policies contained in herein while both slippers and shorts are strictly prohibited during business/working hours

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- 7.1.12 If the employee is found guilty of not performing his/her duties to the satisfaction of the Company (minor/major misconduct), willful breach of trust, continued neglect of any terms of employment and/or committing a criminal offence, the Company shall be at liberty to terminate the services of the employee and the said employee shall not be entitled to any compensation from the Company.
- 7.1.13 Any employees that deviate from any of the policies contained herein will be subjected to corrective action and/or disciplinary action, including suspension or termination of employment (**please refer to Section 10 – Corrective Action and Disciplinary Action.**)
- 7.1.14 The Company strictly prohibits any employees who are privy to confidential information of the Company from disclosing such information to anyone without first obtaining the express approval from their immediate Supervisor or HOD. The Company views non-adherence by any employees to the Confidentiality policy as contained under Section 8.5 as a major misconduct and will not hesitate to impose severe corrective action and/or disciplinary action, including suspension or termination of employment.
- 7.1.15 Employees are required to report to HSE (Safety Officers) or HRD if they witness security or safety breach on Company's premises.

7.2 PUNCTUALITY

- 7.2.1 Employees who are late for work must report to their Immediate Superior and Head of Department.
- 7.2.2 Late attendance is viewed seriously by the Company and amounts to a misconduct.
- 7.2.3 Frequent late attendance shall be regarded by the Company as lack of discipline and appropriate disciplinary action will be taken against the respective employee.
- 7.2.4 Any employees who are unable to report for work on time (with reasonable excuse), must notify their HOD or immediate supervisor before their regular starting time. It is the sole responsibility of the said employee to speak directly to his or her respective HOD or immediate supervisor about their absence.
- 7.2.5 Leaving messages to other colleagues, short messaging service (SMS) or on the employee's respective HOD or immediate supervisor's voice mail are unacceptable practices and will not be tolerated by the Company except in extreme emergencies. In the event whereby the employee left voice mail messages, it is the responsibility of the employee to ensure that a follow-up call is made later that day.
- 7.2.6 Any request for a change of shift must be made by the employee to his or her respective HOD or immediate supervisor at a minimum of three (3) working days in advance. Such requests will be granted at the discretion of the employee's respective HOD or immediate supervisor.

7.3 BREAK PERIODS

- 7.3.1 All employees are allowed an hour lunch break which may be a fixed time as per their respective job description. This is to ensure that none of the employees' absence would create potential problems to fellow colleagues in the Company or to potential clients.
- 7.3.2 All Muslim employees are encouraged to perform their prayers during their respective break time.

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7.3.3 Pursuant to the Company's Friday prayer policy, in the event whereby any Muslim employee is required to leave later than the allocated time due to working commitments, they are allowed to extend their break periods upon obtaining express approval from their immediate supervisor or HOD on the same.

7.3.4 Notwithstanding sub-clause 7.3.1, in the event an employee is required to work during their fixed break period (with direct instruction from their immediate supervisor or HOD to do so), they are allowed to extend their break periods upon obtaining express approval from their immediate supervisor or HOD on the same.

7.4 ABSENTEEISM, LATE COMING & EARLY-LEAVING

7.4.1 Regular attendance and punctuality are essential to the operational efficiency of the Company's business.

7.4.2 All employees are required to manage their attendance in accordance to their respective working hours by adhering to the Company's employee attendance monitoring system.

7.4.3 Any employees who need to be absent from work must furnish their respective HOD or immediate superior with an advance notice of absence from work. When circumstances make it impossible to do so, the employee must notify their respective HOD or immediate supervisor at the earliest opportunity during such absence.

7.4.4 Any employees who absent themselves from work without obtaining prior approval from their respective HOD or immediate supervisor or doing so without reasonable excuse for two (2) consecutive working days and did not inform or attempt to inform the Company prior to or at the earliest opportunity during such absence, the Human Resources and Administration Department shall issue a Letter of Self-Termination to the said employee as provided under Section 15(2) of the Employment Act 1955, under the assumption that no reasonable cause for the absence has been established.

7.4.5 In the case of an advance overtime scheduled and the employee has agreed to work on the said date, it will be considered as absenteeism if the said employee fails to show up for the overtime work.

7.4.6 Late coming and early leaving does not only apply to reporting late to work or leaving early from work. It also applies to when the employee is not at his or her workstation before or after the following activities, including but not limited to:

- a) Meal or coffee breaks;
- b) Not returning to the Company immediately after the approved scheduled business is completed;
- c) Not returning to the Company immediately after the approved Doctor's appointment; and
- d) Before the end of the employee's working day.

7.4.7 In the event whereby the employee needs to be away for a longer period than the approved time off, the said employee must immediately inform and obtain his or her respective HOD or immediate supervisor's approval of the new time off period.

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7.5 ABSENCE WITHOUT NOTICE

- 7.5.1 Any employees who are unable to work owing to illness or accident must notify their respective HOD or immediate supervisor immediately, prior to the commencement of the following working day.
- 7.5.2 If the employee becomes ill while at work or must leave the office for any other reason before the end of the working day, the said employee must immediately inform his or her respective HOD or immediate supervisor of the situation and obtain their approval on the same.
- 7.5.3 Any employees who fail to report for work for two consecutive days and the Company is not notified of their status, shall be assumed from their absence that they have resigned and they will be removed from the payroll, effective immediately.
- 7.5.4 The Company reserves the right to terminate without notice and refuse any pay or other forms of compensation of service of any employees who is absent from work for more than two (2) consecutive working days without informing or attempting to inform his or her respective HOD or immediate supervisor, and without a reasonable excuse for their failure to do so.

7.6 SECURITY

- 7.6.1 The Company strives to first ensure the personal safety of all their employees and guests.
- 7.6.2 The Company aims to provide reasonable and prudent protection to its property, assets and information (whether proprietary and/or confidential).
- 7.6.3 All employees are advised to be security conscious and should cooperate with each other in order to maintain the highest degree of security in the Company's premises and worksites.
- 7.6.4 Amongst the general responsibilities of all employees are as follows:-
- a) Prevention of unauthorized entry into the Company's premises, restricted and/or closed areas;
 - b) Prevention of authorized departure from the Company's premises, restricted and/or closed areas;
 - c) Protection of life and Company's personal property;
 - d) Detecting violations of Company's safety rules and/or hazardous conditions; and
 - e) Escorting all visitors and guests at all times while on Company property.
- 7.6.5 All employees should report to the Human Resources Department and/or Health & Safety Officers if they see any suspicious person loitering around the Company's premises.
- 7.6.6 The Human Resources Department personnel and/or the Health & Safety Officers may conduct a search anytime based on the report received from the employee(s).
- 7.6.7 The search will be conducted either upon the employee's entry and/or leaving the Company's premises.
- 7.6.8 Any employees found to have committed any of the following offences shall not be permitted to enter the Company's premises and shall be ordered to leave the premises immediately:
- a) Carrying firearms or any dangerous weapons or substances (including drugs and liquor)
 - b) While being suspended from work; and
 - c) Acting in an irresponsible manner that is detrimental to the reputation of the Company.
 - d) Acting in an irresponsible manner that may be harmful to the other employees.

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7.7 ANTI-HARASSMENT

7.7.1 The Company is committed to providing a work environment to its employees which is free from harassment, including victimization and/or bullying.

7.7.2 The Company does not tolerate any form of harassment (whether verbally, nonverbally and/or physically), including but not limited to harassment on the basis of gender, race, sexual orientation, disability, religious beliefs, age or any other legally protected characteristics under the applicable law.

7.7.3 For the purpose of this subsection, sexual harassment is defined as unwelcomed sexual advances, requests for sexual favor or other verbal or physical conduct of sexual nature whereby:

- a) Submission to such conduct is made as an explicit or implicit term or condition of an employee's employment in the Company;
- b) Employment decisions are based on an employee's submission or rejection of such conduct; or
- c) Such conduct has the purpose of unreasonably interfering with an employee's work performance and/or creating an intimidating, hostile or offensive work environment.

7.7.4 There are two types of sexual harassment and they are further defined as follows:

- a) **"Quid pro quo"** harassment: where submission to harassment is used as the basis for employment decisions. Employee benefits such as raises, promotions and better working hours are directly linked to compliance with sexual advances. Hence, only someone in a supervisory capacity (with the authority to grant such benefits) can engage in quid pro quo harassment.
- b) **Hostile work environment**: where the harassment creates an offensive and unpleasant working environment. A hostile work environment can be created by anyone in the work environment, whether it be supervisors, other employees or clients. Hostile work environment consists of verbiage of a sexual nature, unwelcome sexual materials or even unwelcome physical contact as a regular part of the work environment (eg. texts, e-mails, cartoons or posters of a sexual nature; vulgar or lewd comments or jokes; or unwanted touching or fondling)

7.7.5 Any employees who believe that they have been a victim of harassment or know of any other employee who has, the said employee is encouraged to report it immediately through the Complaint Procedure as reflected under paragraph 7.10.5.

7.7.6 The Company encourages all employees to raise any concerns regarding harassment and make reports on the same without the fear of reprisal. Due to the damaging nature of harassment to the victims and to the entire workforce, aggrieved employees are strongly urged to use the proper Complaint Procedure for harassment. However, filing groundless or malicious complaints is an abuse of this policy and will be treated as a violation.

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7.8 SUBSTANCE ABUSE

- 7.8.1 The Company is committed to providing a safe and productive workplace for all of its employees. In order to keep with this commitment, the Company has established this policy regarding alcohol and drugs abuse for all employees of the Company, regardless of rank or position, which applies to all employees of the Company while they are on the Company's premises or worksites.
- 7.8.2 All employees should be fit and ready to carry out their work duties at all times while at work or on the Company's premises or worksites.
- 7.8.3 All employees are prohibited from being at work or on the Company's premises or worksites while being impaired by drugs or alcohol or with illegal drugs present in their system.
- 7.8.4 The use, possession, sale or distribution of illegal drugs and the misuse of legal drugs or other substances by any employees is strictly prohibited by the Company. Except where authorized by the Company's management, alcohol consumption is not permitted within the Company's premises or worksites.
- 7.8.5 The Company may conduct random check on all of the employees, from time to time, in order to ensure That the employee is in compliance with the Substance Abuse policy contained herein.

7.9 SMOKING

- 7.9.1 Smoking is not permitted anywhere on the Company's premises except in authorized and designated smoking locations.
- 7.9.2 Employees must check with their respective HOD or immediate supervisor on the authorized and designated smoking locations located at their workplace.
- 7.9.3 When smoking at the authorized and designated smoking locations, employees must follow all of the rules posted in the said locations.
- 7.9.4 All employees are advised to smoke during their respective break periods. In the event whereby any employees would like to smoke during their allocated working hours, they must first obtain the express approval from their immediate supervisor on the same which shall not exceed the period of 5 minutes maximum

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7.10 GRIEVANCE

7.10.1 The Company is committed to ensuring that every employee are given the opportunity to voice their complaints in a constructive manner and shall be settled as fairly, equitably and quickly as possible.

7.10.2 For the purpose of this subsection, grievance can be defined as any complaint, problem or concern of an employee regarding their workplace, work or colleagues relationships.

7.10.3 Employees may file grievances, including but not limited to, the following reasons:

- a) Workplace harassment
- b) Healthy and safety
- c) Their immediate supervisor's behavior
- d) Adverse changes in employment conditions

7.10.4 GRIEVANCE PROCEDURE

1. Informal discussion

In the event an employee has a grievance about their employment in the Company, they should first discuss informally with their immediate supervisor on the said matter.

2. Stage 1 – Statement of Grievance

If, after having the informal discussion, the employee still feels that the matter has not be resolved – the said employee should submit their grievance in writing through the **Grievance Form (FORM-GEN-009)** to their respective HOD and/or immediate supervisor.

3. Stage 2 – The Grievance Meeting

Within seven (7) working days, the immediate supervisor will respond to the Grievance Form, in writing, inviting the employee to attend a meeting where the alleged grievance can be discussed. This meeting should be scheduled to take place as soon as possible and a minimum of five (5) working days' notice of this meeting will be provided to the employee where they will further be informed of their right to be accompanied.

The employee must take all reasonable steps to attend the meeting, but if for any unforeseen reason the employee or the employer cannot attend the meeting, the said meeting must be rescheduled to another date. Should an employee's companion be unable to attend, then the employee must make contact within three (3) working days of the date of the letter to arrange an alternative date that falls within three (3) working days of the original date provided. These time limits may be extended by mutual agreement.

After the meeting has ended, the immediate supervisor hearing the grievance must write to the employee informing them of any decision or action taken with respect to their grievance and offering them the right of appeal (should they decide to exercise them). This letter should be sent within seven (7) working days of the grievance meeting and should also include the details on how to appeal.

4. Step 3 – Appeal

If the matter is not resolved to the employee's satisfaction, they must set out their grounds of appeal in writing within seven (7) working days of receipt of the decision letter from their immediate supervisor to their respective HOD, Human Resources Department and/or the CEO.

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Within seven (7) working days after submitting the appeal letter, the employee should receive a written invitation to attend an appeal meeting by the respective parties. The appeal meeting should be chaired by a senior manager (a higher grade employee not involved in the original meeting).

After the appeal meeting, the senior manager must inform the employee in writing of their decision within seven (7) working days of meeting. Their decision shall be final.

7.10.5 **COMPLAINT PROCEDURE**

The Company has established the following procedure for lodging a report of harassment, discrimination or retaliation. The Company will treat all aspects of the procedure confidentially to the extent reasonably possible. The procedure shall proceed as follows:

- a) Any employee who feels harassed, discriminated or retaliated against may initiate the complaint process by filing a complaint in writing to the Head of the Human Resources Department by using the **Grievance Form (FORM-GEN-009)**. No formal action will be taken against any person under this policy unless the Human Resources Department has received a written and signed complaint containing sufficient details to determine if the policy may have been violated. The employee making the complaint (hereinafter referred to as the **“Complainant”**) may obtain the complaint form from the Human Resources Department. If a supervisor or manager becomes aware that harassment or discrimination is occurring, either from his or her own personal observation or as a result of an employee’s coming forward, the said supervisor or manager should immediately report it to the Head of the Human Resources Department.
- b) Upon receiving a complaint or being advised by a supervisor or manager that violation of this policy may be occurring, the Head of the Human Resources Department will notify the Company and review the complaint with the Company’s Legal Department.
- c) Within five (5) working days of receiving the complaint, the Head of the Human Resources Department will notify the person(s) charged (hereinafter referred to as the **“Respondent(s)”**) of a complaint and initiate the investigation to determine whether there is a reasonable basis for believing that the alleged violation of this policy occurred.
- d) During the investigation, the Head of the Human Resources Department, together with the Legal Executive or other management employees, will interview the Complainant, the Respondent and any other witnesses to determine whether the alleged conduct occurred.
- e) Within fifteen (15) working days of the complaint (or the matter being referred to the Head of the Human Resources Department), the Head of the Human Resources Department or any other person authorized to conduct the investigation, must conclude the investigation and submit a detailed written report of his or her findings to the Company.

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- f) If it is determined that harassment or discrimination in violation of this policy has occurred, the Head of the Human Resources Department will recommend appropriate disciplinary action to be taken on the Respondent. The appropriate action will be based on the following factors:
- i. The severity, frequency and pervasiveness of the conduct;
 - ii. Prior complaints made by the Complainant;
 - iii. Prior complaints made against the Respondent; and
 - iv. The quality of the evidence (i.e. first-hand knowledge, credible corroboration)
- g) If the investigation is inconclusive or if it is determined that there has been no violation of policy but potentially problematic conduct may have occurred, the Head of the Human Resources to recommend appropriate preventive action.
- h) Within five (5) days after the investigation is concluded, the Head of Human Resources Department will meet with the Complainant and the Respondent separately, notify them of the findings of the investigation and inform them of the action being recommended.
- i) The Complainant and the Respondent may submit statements to the Head of the Human Resources Department challenging the factual basis of the findings. Any such statements must be submitted no later than five (5) working days after the meeting with the Head of the Human Resources Department in which the findings of the investigation are discussed.
- j) Within ten (10) days from the date the Human Resources Department meets with the Complainant and Respondent, the Company will review the investigative report and any statements submitted by the Complainant or Respondent, discuss results of the investigation with the Head of the Human Resources Department and any other management employees as may be appropriate, and decide what action, if any, will be taken. The Head of the Human Resources Department will report the Company's decision to the Complainant, the Respondent and the appropriate management assigned to the department(s) in which the Complainant and the Respondent work.
- k) The Company's decision will be in writing and will include findings of fact and a statement for or against disciplinary action. If disciplinary action is to be taken, the respondent will be informed of the nature of the discipline and how it will be executed as provided under **Section 10 – Counseling, Corrective Action and Disciplinary Action.**