

COMPANY POLICY CODE OF CONDUCT

Purpose	This policy outlines the Company's expectations regarding employees' behaviour towards fellow co-workers and overall organization. The company promotes freedom of expression and open communication that is responsible, courteous and with decorum to maintain a well-organised, harmonious, respectful, cordial and collaborative environment work environment.
Scope	Applicable to all permanent and contract employees employed by the Company inclusive of foreign workers and expatriate employees.
Revision date	
Issued by	HR Department
Approved by	Managing Director

Contents

1.0. Compliance with laws

- 1.1. All employees are required to observe the company's policies and the laws of Malaysia and play an active role to protect the company's legality.
- 1.2. Employees are expected to be ethical and responsible while discharging their duty and uphold highest standard of ethics.

2.0. Respect in the workplace

- 2.1. Employees must respect their colleagues and be professional in the day-to-day dealings be it in the workplace or outside.
- 2.2. The Company does not allow any kind of discriminatory behaviour, harassment or victimization.
- 2.3. Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

3.0. Professionalism at workplace

- 3.1. Employees shall observe the highest standard of professional conduct and always conduct themselves with integrity and decorum and must not under any circumstances commit any act or omission that would bring damages to the Company, its property, reputation or general interest.
- 3.2. The Company does not tolerate behaviour that interferes with the employee's ability to perform his or her duties.
- 3.3. Use or effects of alcohol or illegal drugs are not acceptable.
- 3.4. Participation in the political process is allowed provided it does not interfere with your work or the effectiveness the employees work and position.

4.0. Company property and proprietary information

- 4.1. Employees shall treat all company's property, whether material or intangible and all its intellectual property with respect and care.

- 4.2. Maintain confidentiality and proprietary information such as product data, pricing, financial data, customer names/addresses or non-public information about other companies, including current or potential supplier and vendors.
- 4.3. Avoid misuse of company equipment or using it frivolously and avoid damage or vandalism.
- 4.4. Safeguard and prevent abuse and unauthorise use of the company's intellectual properties and materials.

5.0. Dress Code

- 5.1. All employees must be clean and well-groomed. Grooming styles dictated by religion and ethnicity is allowed so long as it is appropriate and does not offend others.
- 5.2. All clothes must be work-appropriate and must project professionalism. Clothes that are too revealing or inappropriate are not allowed.
- 5.3. All clothes must be clean and in good shape and *that they maintain adequate personal hygiene.*
- 5.4. Employees must avoid clothes with stamps that are offensive or inappropriate and does not indicate or carry any political affiliation.

6.0. Sexual Harassment

- 6.1. The following are prohibited by the Company;
 - 6.1.1. Commenting on somebody's appearance, sexual orientation, or gender in a derogatory or objectifying way, or in a way that makes them uncomfortable.
 - 6.1.2. Proposing, demanding, or insinuating sexual favours.
 - 6.1.3. Sexual assault.
 - 6.1.4. Creating or posting sexually offensive materials in the workplace.
 - 6.1.5. Flirting at an inappropriate time, even if these advances would have been welcome in a different setting. These actions can damage a person's professional reputation and expose them to further sexual harassment.
 - 6.1.6. Flirting with somebody or pursuing them persistently against their will.
 - 6.1.7. Using obscene comments, gestures, pranks, and jokes that degrade or offend somebody.
 - 6.1.8. Sending or displaying sexually explicit objects or messages.
 - 6.1.9. Invading somebody's personal space, for example by touching them inappropriately.
 - 6.1.10. Threatening, coercing, stalking, or intimidating somebody to pressure them to engage in sexual acts.

7.0. Conflict of interest

- 7.1. Employees are strongly prohibited from;
 - 7.1.1. Use their position in the company for personal advantage
 - 7.1.2. Engage in activities that brings direct or indirect profit to a competitor
 - 7.1.3. Owning shares in a non-listed competitor
 - 7.1.4. Carrying out side-line activities that is not declared and carrying out side-line jobs during work hours.
 - 7.1.5. Using connections obtained through their position in the company for private purposes.

7.1.6. Engage in any acts that is not in the company's fundamental interest be in directly or indirectly.

8.0. **Gifts or Entertainment**

- 8.1. Employees are not allowed to accept any form of gifts or favours from business partners contractors, suppliers, clients, customers or any other party having business dealings with the Company. This includes gifts to family members.
- 8.2. Employees shall not accept any gratuitous entertainment from any of the Company's clients, customers, suppliers, contractors or any party with whom the Company has business dealings with.
- 8.3. Gift, entertainment or business courtesy cannot be offered to or accepted from government or political officials.
- 8.4. Employees shall not in any manner or form offer on behalf of the Company or receive an offer of graft or a bribe for his own benefit or the benefit of his relatives or spouse.

9.0. **Whistle blowing**

- 9.1. The Company encourages employees to report or disclose any improper conduct by any employee, supplier, business partner, clients or any parties that has come to their knowledge which includes but not limited to;
 - 9.1.1. Fraud
 - 9.1.2. Bribery
 - 9.1.3. Abuse of Power
 - 9.1.4. Conflict of Interest
 - 9.1.5. Theft or Embezzlement
 - 9.1.6. Misuse of Company's Property
 - 9.1.7. Non-Compliance with Procedure
- 9.2. Report should be expressed in writing to the Managing Director who is designated as the person primarily responsible for oversight of this procedure. Verbal report will not be entertained.
- 9.3. A whistle-blower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, the employee who whistle blows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed, to the extent reasonably practicable, provided is accorded even if the investigation later reveals that the whistle-blower is mistaken as to the facts and the rules and procedures involved.
- 9.4. Any anonymous disclosure will not be entertained. Any employee or member of the public who wishes to report improper conduct is required to disclose his identity to the Company in order for the Company to accord the necessary protection to him. However, the Company reserves its right to investigate into any anonymous disclosure.

10.0. **Work hours and tardiness**

- 10.1. Employees must report for work at the assigned/scheduled work hours. Immediate superior must be notified immediately if the employee is late to work.

- 10.2. Employees are prohibited from leaving work prior to the end of work hours without prior approval of immediate superior.
- 10.3. Follow strictly meal/break period
- 10.4. An employee shall be deemed to have broken his contract if he/she has been continuously absent from work for more than two consecutive working days without prior leave, unless with a reasonable excuse for such absence and has informed or attempted to inform his employer of such excuse prior to or at the earliest opportunity during such absence.

11.0. Safety, health and environment

- 11.1. The company strives to ensure high standards of compliance with regards to safety, health and environment practices.
- 11.2. It is everybody's responsibility to ensure a safe work environment.
- 11.3. The below incidents and activities must be reported immediately to the company via established channel.
 - 11.3.1. Accidents and potential hazards
 - 11.3.2. Potential safety hazards and faulty equipment or facilities.
 - 11.3.3. Report any activity that you recognize as an unsafe work practice or failure to comply with the established procedures
 - 11.3.4. Any company activities or individual behaviour or acts that effects the environment.

12.0. Disciplinary actions

- 12.1. Employees are advised to adhere to company's policies and the code of conduct.
- 12.2. Failure to comply to the above shall results in disciplinary actions including dismissal if found guilty. In some cases, suspension or demotion may be meted out.
- 12.3. Legal action may have to be pursued in cases of corruption, theft, embezzlement or other unlawful behaviour.

13.0. Grievance Management

- 13.1. Employees are advised to lodge a grievance report if they are being unfairly treated or are/were subjected to any forms of treatment that is inconsistent with the company's code of conduct and business ethics or is inconsistent with fair and equal treatment of employees.
- 13.2. All grievance report shall be handled with utmost confidentiality and care throughout the process and shall be dealt with promptly. The employee shall be keep informed on the progress and outcome of the investigations and actions taken. The Company endeavours to resolve all grievances within fourteen (14) working days, failing which, the employee shall be kept notified.
- 13.3. Should the employee be unsatisfied with the action taken by the Company, the employee may lodge a report with the Managing Director or to the Board of Directors, whichever is higher.

- 14.0. The Company reserves the right to amend this policy from time to time and shall notify all employees when such amendment has been made and has been approved by the Management.
- 15.0. Should there be a translation of this policy into other languages, the English version of this policy shall be authoritative in the event of any dispute or confusion.

This sample policy/letter/document is merely a sample or guidance. Companies are advised to practice caution when drafting its HR documentation and shall always be in compliance with the Employment Act and Industrial Relations Act as well as past case laws so as to ensure the policy does not violate or infringe the prevailing employment regulations. Companies are encouraged to adopt best practices to be attractive employers and promote a productive and competitive operating landscape. The author shall not be held liable for any damages or claims arising from the usage of the contents of this document.

*Prepared by Arulkumar Singaraveloo
HR Consultant; arulkumar.singaraveloo@gmail.com*