

CODE OF CONDUCT

Purpose	This policy outlines UCSI Group’s expectations regarding employees’ behavior 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-organized, harmonious, respectful, cordial and collaborative environment work environment.
Scope	Applicable to all permanent and contract employees employed by the Group
Revision date	17 July 2023
Issued by	Group Human Resource Office

1.0. Compliance with laws

- 1.1. All employees are required to observe the Company’s policies, industrial requirements, external codes 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 the highest standard of ethics.

2.0. Professionalism at 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. Employees must, at all times, treat all colleagues, customers, suppliers, contractors, or other persons with whom they deal in the course of their employment in a fair and non-discriminatory manner.
- 2.2. Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.
- 2.3. Employees shall observe the highest standard of professional conduct and always conduct themselves with integrity, transparency, justice, fairness 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.
- 2.4. The Company does not tolerate behavior that interferes with the employee’s ability to perform his or her duties.
- 2.5. Use or effects of alcohol or illegal drugs are not acceptable.

3.0. Company property and proprietary information

- 3.1. Employees shall treat all Company’s property, whether material or intangible and all its intellectual property with respect and care.
- 3.2. 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 suppliers and vendors.

- 3.3. Avoid misuse of company equipment or using it frivolously and avoid damage or vandalism.
- 3.4. Safeguard and prevent abuse and unauthorized use of the company's intellectual properties and materials.
- 3.5. Employees are not allowed to use sound or image recording devices of any kind (including but not limited to tape recorders, video recorders, cameras and cell phone cameras) to record or create images of Company records, the Company facilities, any other Company assets, and conversations that take place at Company's premise or that involve the Company's business, unless with prior approval by the Company.

4.0. Dress Code

- 4.1. All employees must be clean and well-groomed.
- 4.2. All clothes must be work-appropriate and must project professionalism. Clothes that are too revealing or inappropriate are not allowed.
- 4.3. All clothes must be clean and in good shape and that they maintain adequate personal hygiene.
- 4.4. Employees must avoid clothes with stamps that are offensive or inappropriate and do not indicate or carry any political affiliation.

5.0. Acts of Violence, Inappropriate Behaviors and Criminal Offences

- 5.1. All employees are strongly prohibited from:
 - 5.1.1. Rioting or participating in disorderly behavior within the Company's premises or within its vicinity at any time.
 - 5.1.2. Fighting within the Company's premises or within its vicinity at any time.
 - 5.1.3. Harassing another Employee, including stalking another Employee.
 - 5.1.4. Engaging in any form of bullying, directed at co-workers, subordinates, supervisors, or any other individual within the workplace.
 - 5.1.5. Disregarding or disobeying directives and instructions given by supervisors and/or authorities within the Company.
 - 5.1.6. Serious pecuniary indebtedness such as incurring excessive debt with the Company, other Employees and/or outsiders.
 - 5.1.7. Using insulting, demeaning and/or vulgar words or gestures against another employee or outsiders, within the Company's premises or its vicinity at any time.
 - 5.1.8. Defaming, degrading, discrediting or dishonouring the Company and/or any of its Employees.
 - 5.1.9. Spreading of malicious rumours about the Company and/or any of its employees.

- 5.1.10. Any form of violence, abuse, assault (including threatening to assault or injure) against another employee.
- 5.1.11. Possession of unauthorized firearms or other dangerous weapons within the Company's premises.
- 5.1.12. Committing any indecent and/or immoral act on the Company's premises.
- 5.1.13. Criminal conduct or the employee's failure to report to the Company is criminal conduct that would adversely affect the employee's work performance or cause major discredit or embarrassment to the Company.
- 5.1.14. Conviction and imprisonment for any criminal offence.
- 5.1.15. Money laundering.
- 5.1.16. Involved in or aid any activity where the relevant authorities require the Employee to be placed under any legal order of restricted residence or banishment.
- 5.1.17. Any other acts that could bring disrepute or embarrassment to the Company.

6.0. Sexual/Gender/Race/Religion Related Offences

- 6.1. All employees are strongly prohibited from:
 - 6.1.1. Showing insensitivity, intolerance and disrespect towards others, including the opposite gender, other races and/or the religious requirements of others.
 - 6.1.2. Sexual assault against another Employee and/or outsiders.
 - 6.1.3. All forms of sexual harassment (verbal, non-verbal, visual, psychological and physical) against another Employee and/or outsiders.
 - 6.1.4. Sending or distributing sexual-related materials (such as pornographic materials, lewd messages etc.).
 - 6.1.5. Keeping or viewing pornographic materials on the Company's premises (such as pictures, videos, website etc.).
 - 6.1.6. Making derogatory comments based on gender, racial or religious characteristics, bigotry, extremism, unjustified acts causing harm to any individual or group, including any actions that can disrupt harmony and cohesion.
 - 6.1.7. Making offensive or inappropriate name calling, slurs or jokes.

7.0. Conflict of Interest

- 7.1. Employees are strongly prohibited from;
 - 7.1.1. Using their position in the company for personal advantage

- 7.1.2. Engaging 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. Engaging in any acts that is not in the company's fundamental interest be in directly or indirectly.
- 7.2. Conflict of interest may arise if two or more employees are related or have a personal relationship within the same team, such as spouses or immediate family members. To maintain a work environment free from potential conflicts, such employees should not work together in the same office or department / division, directly or indirectly supervise one another, or be in a position to influence the hiring, work assignments or assessments. Employees who enter into or become aware of a personal relationship that may create a conflict of interest are to promptly disclose it to their immediate supervisor or Group Human Resource Office. Timely disclosure would allow the Company to address potential conflicts and take appropriate measures to mitigate them.

8.0. Improper Gifts or Entertainment

- 8.1. To protect against the undue obligation of the employee to any outside parties, the employee shall declare to the Company any gifts, other than gifts which are an exchange of corporate souvenirs, food hamper, flowers or vouchers and tokens of insubstantial value priced RM500 or below, made to himself or herself or any member of his or her immediate family by principals, agent, dealers and any parties who have business dealings with the Company. The Company shall decide how the gift shall be disposed of.
- 8.2. The actual or attempted use of any form of bribery either directly or indirectly on behalf of the Company to advance personal or business interest is strictly prohibited. A bribe may be in the form of cash, gifts, entertainment, hospitality, travel perks or special favours or privileges, advantage or merely a promise to induce or influence the action.
- 8.3. 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 or her own benefit or the benefit of his or her immediate family.
- 8.4. Any employee who is aware or has any knowledge of any form(s) of bribery activity is required to report such information to their superior or bring the matter to the attention of the Group Human Resource Office. An employee who is involved in a bribery activity shall be subjected to disciplinary action, including dismissal.
- 8.5. The Company expects its employees to compete fairly and ethically for all business opportunities. Employees may provide meals, refreshments or entertainment to customers, contractors or suppliers provided that is done with approval, in the ordinary and proper course of business and could not

reasonably be seen as bribes or improper encouragement. All such expenditures must be properly recorded in the Company.

- 8.6. Employees must not offer gifts, commissions, gratuities, or other payments to prospective or existing customers, contractors or suppliers without the prior written approval of the Company.

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 Group Human Resource Office. Verbal report will not be entertained.

- 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.

- 9.5. The Whistleblower's personal details and identity shall be protected, i.e. kept confidential unless otherwise required by law or for the purpose of any proceedings by or against any Company.

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. Strictly follow meal/break period. However, flexibility will be given to the employee with the approval of the immediate superior to have their meal/break period earlier or later due to work-related matters.

- 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 (2) 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 is committed to improve safety and health, prevent workplace injuries and illnesses, safeguard the environment and promote sustainability awareness and practices.
- 11.2. All employees are required to comply with the safety and health regulations and instructions and fire prevention and fire fighting regulations issued by the Company from time to time.
- 11.3. The below incidents and activities must be reported immediately to the company via an 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 behavior or acts that effect the environment.
- 11.4. To take reasonable care to protect the physical and natural environment including using resources and disposing of waste in a manner that does not harm the environment.

12.0. Disciplinary actions

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

13.0. Personal Information and Privacy

- 13.1. Every employee's personal information is important to us and when we collect, process, use and disclose personal information in accordance to our policy, we must ensure it is the minimum necessary, for our business needs, such as to meet specific human resources or legal purposes.
- 13.2. All personal information obtained during the course of your employment is deemed to be confidential information and sharing of any of such information to third parties, including employees, is strictly prohibited.
- 13.3. All employees must respect other employees' privacy. Employees must not divulge, disseminate or share any personal information and/or sensitive information of other employees, business associates or customers to unauthorized persons in or outside the Company.

14.0. Job Performance

- 14.1. All employees must, at all times, perform their duties competently, diligently, to be accountable for their own actions and at all times to endeavor to the utmost of the employees' ability to promote and advance the interest of the Company.
- 14.2. Every employee must perform his or her duties in a manner consistent with the Company's expectations.
- 14.3. Every employee must comply with the instructions of his or her superiors.
- 14.4. Every employee must act respectfully, loyally and honestly and must refrain from any action that could jeopardize the Company's legitimate interests.

15.0. Grievance Management

- 15.1. Employees are advised to lodge a grievance report if they are being unfairly treated or are/were subjected to any form 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.
- 15.2. All grievance reports shall be handled with utmost confidentiality and care throughout the process and shall be dealt with promptly. The employee shall be kept 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.
- 15.3. 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.

16.0. Reporting of violations of the Code of Conduct

- 16.1 Each employee has the obligation to expeditiously report any violation or suspected violation of this Code of Conduct, in order to protect the company, its stakeholders, its employees and its customers or clients.
- 16.2 You should report any information with such violation or suspected violation or bring the matter to the attention of the following where appropriate:
 - i. Top Management Team
 - ii. Dean/Director
 - iii. Head of Department/Business Unit
 - iv. Head of Group HR

- 17.0. The Company reserves the right to amend this policy from time to time and shall notify all employees when such an amendment has been made and has been approved by the Management.