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# EMPLOYEE CODE OF CONDUCT

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## **SECTION 7: APPENDIXES (KBCS EMPLOYEE HANDBOOK EXTRACT)**

### **7.3 CODE OF CONDUCT AND DISCIPLINE**

#### **7.3.1 Policy**

- (i) 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.
- (ii) The Group will deal only with those organizations having ethical standards compatible with its own declared policy. The employee will report promptly to the appropriate authority (ies) 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.
- (iii) Employees who have any doubts on the appropriate course of action involving matters of business ethics should consult their Head of Department or Group Managing Director.
- (iv) 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.

#### **7.4 Employee Obligations**

- 7.4.1 Employees are expected to give their best efforts at all times so as to provide our clients with quality service and products. Employees should inculcate high standard of professionalism, render undivided loyalty and devotion to the Group, show strong team spirit, serve with honesty and integrity, goodwill, and courtesy, display high sense of cooperativeness and proactive in carrying out his duties. This obligation extends to the protection of the physical and intellectual assets of the Group and its client(s). Accordingly, employees:
  - 7.4.2 shall keep confidential all proprietary information of the Group and its client(s), which includes commercial and human resource data, design and intellectual property of all forms;
  - 7.4.3 shall not speak to the media or publish anything about the Group or client business unless authorized;
  - 7.4.4 shall inform the Group Managing Director or the Head of Department about breaches of the law and safety matters as soon as they become aware of them; and where the concerns raised are not answered by the Group, are free to communicate these concerns to an appropriate government agency. Whenever an agency of government conducts an investigation, employees should cooperate fully;
  - 7.4.5 must use the resources of the Group and its client(s) only for relevant business purposes. This applies shall keep accurate and sufficient records organized 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 or that of its client(s); and
  - 7.4.6 shall observe established delegation of financial and personnel authorizations.

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## **7.5 Integrity of Business Practices**

- 7.5.1 Employees of the Group have the obligation to inform the senior management as soon as they become aware of practices or circumstances, which may involve them in unethical conduct or conflict of interest. This obligation applies when dealing both within the Group and externally. In doing business with any organization the following standards apply:
- 7.5.2 employees must deal fairly and equitably with their colleagues and external contacts;
- 7.5.3 employees must not misrepresent themselves or the Group to anyone. If a misunderstanding occurs, immediate clarification should be made once this becomes evident;
- 7.5.4 employees must not engage in any ‘collusive’ practices which may lead to a client of the Group receiving less than a fair and competitive service;
- 7.5.5 unauthorized 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;
- 7.5.6 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. The provisions of the Prevention of Bribery Ordinance shall apply in all respects. In this regard the acceptance of souvenirs, advertising and promotional items of nominal value only is permitted. Items of more substantial value should be declined or recorded and disposed of in accordance with stated Group procedures;
- 7.5.7 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;
- 7.5.8 the Group will meet all reasonable expenses associated with your travel, food and accommodation on company recognized business. Such arrangements should not be accepted from suppliers unless at the supplier’s facilities or otherwise unavailable through normal commercial sources.

## **7.6 Personal Behavior**

- 7.6.1 The personal behavior of employees should reflect the ethical standards of the Group and respect the rights of the Group and its client(s) 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 or its client(s).
- 7.6.2 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:
- 7.6.3 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;
- 7.6.4 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;

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- 7.6.5 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;
  - 7.6.6 you may not perform outside work or solicit non Group business on Group premises or in Group time nor may you use company or client resources for outside work;
  - 7.6.7 you may not use your association with the Company or its client(s) to sponsor, endorse or advance the interests of another organization except where you have the prior written consent of the Directors/Group Managing Director;
  - 7.6.8 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 recognized commission or payment scheme which is available to all suppliers or providers;
  - 7.6.9 employees should not borrow from or lend money to clients, suppliers, or contractors of the Group.

## **7.7 Dress Code**

- 7.7.1 An employee should be neatly, appropriately, and decently attired during office hours.
- 7.7.2 In choosing a fashion, an employee should always bear in mind the criteria of decency and present ability in keeping with the Company good image.
- 7.7.3 Slippers, round neck T-shirts (except for company T-Shirt) are not allowed in head office during working hours.

## **7.8 Participation in the Media and Social Media**

- 7.8.1 An employee shall not participate in any form of advertisement or broadcasting whether in the newspapers, magazines, radio or television or any other media with the exception of the Company publications, without prior written consent from the Company.
- 7.8.2 An employee shall not make any comments, postings of any information related to Company's policies, activities and operations which could give negative or bad image to the Company in the media social at any time.
- 7.8.3 An employee may be allowed to contribute literary or academic articles to any publication, i.e. Newspaper, magazine or journal, provided he gets prior written permission/consent from the Company. Any monetary rewards thereby obtained by the employee should be declared to the Company who will use his discretion to decide whether the employee may retain such monetary rewards.

## **7.9 Breach of Conduct**

- 7.9.1 The Group recognize that a breach of ethical business behavior may result in its removal from the list of suppliers and services to the Government. 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.

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## **7.10 Conflict of Interest**

- 7.10.1 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.
- 7.10.2 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 confidential the Group information to which you have access as part of your job. A clear case of conflict arises if you accept gifts or valuable favors from individuals or firms doing or wanting to do business with the Group or attempting to influence some the Group's decision.
- 7.10.3 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.

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

- 7.11.1 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 organization, 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.

## **7.12 Utilizations of Information Technology**

- 7.12.1 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.
- 7.12.2 To object and use facilities for the purposes for which the employee is authorized. Violations include:
  - 7.12.3 install your own software on the Group's computing resources;
  - 7.12.4 installing illegal licensed software which is not meant to reside on the Group's computing facilities which is assigned to you;
  - 7.12.5 using another person's account or attempting to capture other users' passwords without consent;
  - 7.12.6 circumventing normal resource limits, log on procedures and security regulations;
  - 7.12.7 trying to obscure your genuine identity as the sender of electronic mail;
  - 7.12.8 using the Group's computing resources for commercial purposes; and
  - 7.12.9 using the Group's computing resources to harass, intimidate or threaten other users.

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- 7.12.10 At all times respect the privacy of other users. 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.
  - 7.12.11 At all times respect the rights of others to make use of the Group's computing resources. Violations include:
    - 7.12.12 placing obscene or harassing material in areas that can be/are publicly accessed;
    - 7.12.13 sending/forwarding chain letters or deliberately flooding a user with automatically generated mail;
    - 7.12.14 distributing information not intended for distribution by owner;
    - 7.12.15 printing or sending excessive copies of documents, files, data or programs;
    - 7.12.16 attempting to modify or remove computer equipment;
    - 7.12.17 attempting to degrade or disrupt system security or performance; and
    - 7.12.18 damaging or vandalizing Group's computing facilities, equipment, software or computer files.
  - 7.12.19 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.
  - 7.12.20 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.
  - 7.12.21 An employee who is authorized 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.
  - 7.12.22 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.
  - 7.12.23 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.

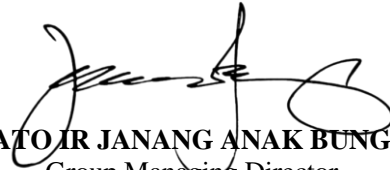
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- 7.12.24 An employee who is found abusing with the Group’s computing resources may also be liable for civil or criminal prosecution. An employee should observe strictly that nothing in this Information Technology guideline can preclude enforcement by the Group under the laws and regulations.
- 7.12.25 Not at any time during the continuance employment with the Group attempt to authenticate another computer user.
- 7.12.26 Not any time during the continuance employment with the Group play games on computers.
- 7.12.27 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.
- 7.12.28 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.

Compliance Manager:



**SPENNY ANAK INGOK**  
Head Of Department – Finance & Admin

Authorized by:



**DATO IR JANANG ANAK BUNGSU**  
Group Managing Director