



HEKTAR
GROUP

HEKTAR ASSET MANAGEMENT SDN BHD

**CODE OF CONDUCT AND ETHICS
AS AT 1 JUNE 2020**

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SECTION I: OUR SCOPE, ADMINISTRATION, VALUES AND MODEL

SCOPE

This Code of Business Conduct and Ethics (“Code”) serves to outline baseline standards for ethical business conduct and acts as a guiding document for interactions with stakeholders. The Code shall permeate across all levels of Hektar Asset Management Sdn Bhd (“HAMSB” or the “Company”) and its related entities (collectively referred to as the “Group”).

The Code shall be applicable to Directors, Management and other employees of the Group whilst key stakeholders such as customers, suppliers, contractors and service providers are encouraged to refer to this document for guidance on their dealings with the Group. The Code shall also form an integral component of the Group’s risk management strategy.

As the stipulations contained in this Code cannot be all encompassing and exhaustive, Directors, Management and other employees are expected to conduct themselves in the spirit as well as the letter of these stipulations (kindly refer to the “lawful and thoughtful” decision making model on page 3).

The Group Human Resource Department is the custodian of the Code. The Group Human Resource Department shall be responsible for socialising this Code to Management and other employees whilst the respective Company Secretaries within the Group shall bear this responsibility in the case of dissemination to Directors.

There will be serious ramifications for non-adherence to the stipulations in this Code based on the gravity of the breach. In selected cases, this could even lead to the termination of contracts and reporting to enforcement agencies. Any waivers to the stipulations in this Code can only be made by the Board of Directors of HAMSB.

ADMINISTRATION

This Code should be read together with enumerations encapsulated in the relevant legislative and regulatory promulgations including but not limited to the following:

- i. Malaysian Anti-Corruption Commission Act 2009;
- ii. Capital Markets and Services Act 2007;
- iii. Main Market Listing Requirements of Bursa Malaysia Securities Berhad (“Listing Requirements”); and
- iv. Malaysian Code on Corporate Governance.

Where there is a conflict between the contents of this Code and the laws and regulatory promulgations, the relevant enumerations contained in the legislations and regulations shall prevail.

The Code shall also be read in tandem with other governance policies and documents of the Group such as the Delegated Approval Limits and Whistleblowing Policy. In the event of ambiguity concerning the stipulations contained in this Code, stakeholders should consult Group Human Resource Department to navigate the attendant issues, rather than disregarding the Code without prior consultation.

In this Code, words importing one gender include the other gender and words importing the singular include the plural and vice versa, as the case may be.

VALUES

The Group's values and approach towards ingraining a healthy corporate culture can be encapsulated by the moniker of "HEKTAR", as outlined below:



Honesty. To groom leaders that would never compromise on their honesty and integrity.



Excellence. Strive towards excellence in the day-to-day conduct and dealings with stakeholders.



Knowledge. To be well-equipped with knowledge on the regulatory framework, internal policies and market practices.



Trustworthy. To display exemplary conduct and preserve the confidence of stakeholders based on the notion that "trust is the currency of business".



Adequacy. Institute and apply adequate procedures for proactive compliance with laws and regulations.



Reliability. To demonstrate reliability and manifest congruence between words and actions.

MODEL

When faced with an ethical dilemma, you can use the decision-making model below to assist you in developing conviction for making tough but necessary decisions.

Lawful and Thoughtful Decision Making Model

Apply the “3As” concept

— 3 —

- Appreciate
- Answer
- Act

Is your action legal?

Is your action aligned with the values of the Group?

Is your action in accordance with the stipulations of the Code?

Would your action result in the “greater good” of stakeholders?

Would you be proud to tell other of your actions?

If you answer ‘no’ to any of these questions, or are wavering, you should seek assistance from the Group Human Resource Department

“ To do the right thing, at the right time, in the right way and for the right ends. “

“ A practical aim, for we are not investigating the nature of virtue for the sake of knowing what it is, but in order that we may become good “

Aristotle

Whilst what the Group achieves is important, so is how the Group achieves it. Operating with high standards of ethics remains a shared responsibility of all across the Group.

SECTION II: DEFINITIONS

For the purposes of this Code, unless otherwise is stated, the terms listed below represents its respective definitions

“AML/ CFT”	Anti-Money Laundering/Counter Financing of Terrorism
“Board”	the Board of Directors of HAMSB and other related entities within the Group
“Close personal relationships”	A close association or acquaintance (which may be based on regular business interactions or other social commitments), creating situations whereby a Director and/or employee has influence over a person or vice versa.
“Confidential information”	<p>Refers to all non-public information entrusted to or obtained by a Director or an employee by reason of his position in the Group. It includes, but is not limited to, price-sensitive, non-public information that might be useful to competitors or detrimental to the Group or its customers if disclosed, such as:</p> <ul style="list-style-type: none">a) non-public information about the Group’s financial condition, prospects or plans, trade secrets, business concepts, its marketing and sales programs, research and development information, as well as information relating to mergers and/or acquisitions and divestments;b) non-public information concerning possible transactions with other entities or information about the Group’s customers, suppliers or joint venture partners that the Group is under an obligation to maintain as confidential; andc) non-public information about a Director or employee or client information, discussions and deliberations relating to business issues and decisions between and amongst employees and Directors.
“Conflict of interest”	A situation whereby personal interests and relationships impair or appear to impair the independence of any judgment in which, the Director or employee may need to exercise in discharging his duties to the Group. It could also arise in situations where an individual is in a position to take advantage of his role in the Group for his personal benefit, including the benefit of his family members or close acquaintances. This would undermine the duties of good faith, fidelity, diligence and integrity as expected by Group from its Directors and employees in discharging their duties and obligations
“Corruption”	Refers to an act of giving or receiving of any gratification, bribe or reward in the form of cash or in-kind of high value for performing a task in relation to his or her job description.
” Director(s)”	Means the Director(s) of the Group in accordance with the definition provided in the Companies Act 2016.
“Employee”	Refers to a person who accepts a form of remuneration from

the Group in exchange for services performed to or on behalf of the Group, either on a permanent, temporary, assignment, or secondment basis, and includes agents and consultants working for the Group. Where an employee is employed on a contractual basis and the terms of the contracts differs materially from the provisions in the Code, the terms of the contract prevails.

“Entertainment”

The definition shall include but not be limited to the following:

- a) the provision of food, drink, recreation or entertainment of any kind; and/ or
- b) the provision of accommodation or travel in connection with or for the purposes of facilitating entertainment of kind mentioned in paragraph (a) above;

with or without consideration paid whether in cash or in kind, in promoting or in connection with a trade or business activities and/ or transactions.

“Facilitation payment”

Any form of payment made to a person or an entity in order to facilitate, expedite and/ or secure the interest of the giver or persons connected to the giver through the performance of a routine or administrative duty or function.

“Family members”

Refers to persons who falls within any one of the following categories:

- (a) spouse;
- (b) parent including parent in-law, grandparents and grandchildren;
- (c) child including adopted child and step-child;
- (d) brother or sister, nieces, nephews, uncles, aunts, cousins and any persons related through adoption and legal guardianship; and
- (e) spouse of the person referred to in subparagraphs (c) and (d) above

“Gift(s)”

Refers to something that is bestowed voluntarily and without any form of compensation and shall constitute money, donation, loan, fee, reward, valuable security, goods, services, movable or immovable property, interest or use of the Group’s facilities or property that may provide any other similar advantage or benefits. The definition shall include but not be limited to the following;

- a) any office, dignity or titles, contract of employment or services, and any agreement to give employment or render services in any capacity;
- b) any payment, release, discharge or liquidation or any loan, obligation or other liability, whether in whole or in part;
- c) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- d) any forbearance to demand any money or money’s worth or valuable thing;
- e) any other service or favours of any description, such as granting any favourable terms outside the ordinary course of business without prior approval from the Board, protection from any penalty or disability incurred or apprehended or from any action or proceedings of a

disciplinary, civil or criminal nature, whether already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty;

- f) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs; and
- g) any cash or cash equivalents in the form of vouchers, discounts, coupons, shares or bonds and commission etc.

“Gratifications”

The definition shall include but not be limited to the following;

- (a) money, donation, fee, loan, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
- (b) any office, dignity or titles, directorships, employment, contract of employment of services, and agreement to give employment or render services in any capacity;
- (c) any payment, release, discharge or liquidation or any loan, obligation or other liability, whether in whole or in part;
- (d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- (e) any forbearance to demand any money or money’s worth or valuable thing; and
- (f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty
- (g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs; and
- (h) any cash or cash equivalents in the form of vouchers, discounts, coupons, shares and commission etc.

“Intellectual property”

Refers to inventions, copyrights, patents, trademarks, branding and technology, and industrial designs owned by the Group.

“Inside material information”

Refers to all material information of Group, including but not limited to Hektar REIT’s financial performance and operational information which is not generally available or has not been disclosed to the public, and if the material information becomes generally available or was to be made known to the public, would or would tend to influence reasonable persons who invest in the securities of Hektar REIT, who would expect it to have a material effect on the price or the value of units of Hektar REIT, in deciding whether or not to acquire or dispose of such securities.

Listing Requirements

Refers to Main Market: Listing Requirements of Bursa Malaysia Securities Berhad.

“MACC”	Malaysian Anti-Corruption Commission.
“Management”	Refers to C-suite employees of the Group
“Money laundering”	Refers to any act or attempted act to conceal or disguise the identity of illegally obtained proceeds and passing it through legitimate business channels so that they appear to have originated from legitimate sources.
“Nominal Value”	Refers to any gift(s) bearing the sum of an aggregate amount of not more than Ringgit Malaysia Three Hundred only (RM 300).
“Public statement”	Refers to the making of any statement or comment to any media (electronic and/or print), the internet and speaking engagements. It also applies to every kind of correspondences with the media in print or electronic form as well as through social media channels.
“Trust Deed”	Refers to the trust deed that constitutes Hektar REIT, and whereby HAMSB is appointed as the Manager for Hektar REIT and is responsible for the day to day management of the REIT.
“Third Party/Parties”	Refers to parties who are external persons or companies independent of the Group, which may include customers, potential customers, contractors, suppliers, enterprises and any other stakeholders with whom a business relationship, whether current, prospective or historic exists.

SECTION III: ETHICS AND CONDUCT

1.0 INSIDER TRADING

- 1.1 The Directors, employees of the Group and their family members are required to comply with the applicable laws and regulations on insider trading, including restriction in dealing with publicly traded securities of Hektar REIT at all times whilst in the possession of material non-public information or price sensitive information, until such information is generally available to the public.
- 1.2 In accordance to **Section 188(2) of the Capital Markets and Services Act 2007**, the Directors, employees of the Group and their family members shall not deal in securities of any entity listed or pending listing on a stock exchange at any time when he is in possession of information, obtained as a result of his directorship or employment by, or his connection with the Group which is not generally available to the public, and which, if it was so available, would likely bring about a material change in the market price of shares/units or other forms of securities of the entity concerned.
- 1.3 The Directors and employees of the Group shall at all times safeguard all confidential information of the Group and shall never use it to trade in units or other securities of Hektar REIT or recommend or cause a third party to do so as prohibited by **Section 188(3) of the Capital Markets and Services Act 2007**. Unless authorised, Directors and employees shall only disclose such information by any order of any court or competent jurisdiction or any competent judicial, governmental or regulatory authority. Breach of insider trading laws and regulations can result in severe criminal penalties, as spelt out in **Section 188(4) of Capital Markets and Services Act 2007** as well as civil actions by the affected parties.
- 1.4 All Directors and employees of the Group shall abide by the applicable securities laws and regulations and avert relevant breaches, which include false trading, market rigging, market manipulation, fraudulent and misleading trading, electronic crime and dissemination of false information.

2.0 CONFIDENTIALITY OF INFORMATION

- 2.1 Directors and employees should never use or disclose confidential information to any other employees, third parties and members of the public unless otherwise as authorised by the Board or the Management of the Group for a legitimate cause.
- 2.2 Directors and employees shall not disclose confidential information outside the Group, either during or after their service with the Group, except when disclosure is authorised by the Board or Management or required by any order of any court of competent jurisdiction or any competent judicial, governmental or regulatory authority, as the case may be. Directors and employees should also be vigilant to avoid unintentional disclosure by adopting safe practices when transmitting or storing confidential information.
- 2.3 Directors and employees shall not disclose/disseminate confidential information within the Group except to those who need to know such information and only in accordance with applicable laws and regulations and the policies and procedures determined by the Board and Management. Directors and employees shall take steps to maintain confidentiality at all times to avoid inadvertent disclosures.
- 2.4 If any of the confidential Information is retained in the custody of the Directors and employees after ending their service with the Group, the said individual shall take all reasonable steps to promptly repatriate these documents and information to the Group.

- 2.5 Any Directors and employees entrusted with such confidential information must abide by the **Insider Trading** stipulations as outlined in **paragraph 1.0**. Any breaches to the preservation of the Confidential Information will be treated as an insider trading offence and the concerned Director and employee will be subjected to criminal penalties in accordance to the law and/or civil actions by affected parties.
- 2.6 The Directors and employees, during and after being in service with the Group, shall take appropriate measures so that all information and confidential documents are not exposed or divulged to unauthorised parties.

Checkpoint

Scenario

Your acquaintance is contemplating to purchase some units of Hektar REIT in the next few days. You know Hektar REIT is slated to make an announcement that will have a negative impact on the unit price. Is it acceptable for you to drop hints to your acquaintance that he should wait to purchase?

Ethical course of action

No. You should never divulge information about the Group's business which is not publicly available. You should not use inside information to influence the investment decisions of others. Divulging such information would be an offence under the securities law as outlined in **Section 188(3) of the Capital Markets and Services Act 2007**.

3.0 ANTI-MONEY LAUNDERING/ANTI-TERRORISM FINANCING

- 3.1 Directors and employees of the Group are prohibited from being involved in money laundering and terrorism-financing activities as enshrined in the applicable Anti-Money Laundering/Counter Financing of Terrorism ("AML/ CFT") laws and regulations including the **Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities 2001**.
- 3.2 The following are some example indicators of money laundering and terrorism financing:
- 3.2.1 Requests for payment amounts that differ from the milestones stated in the contract;
 - 3.2.2 Currency of payment that differs from that stated in the contract;
 - 3.2.3 Mode of payment used is outside the course of normal business practice; or
 - 3.2.4 Payments to/from parties that are not the contracting parties.
- 3.3 Directors and employees shall ensure that counterparty due diligence is conducted to understand the business and background of the prospective business counterparties with a view of ascertaining the origin and destination of money, property and services to comply with the applicable AML/CFT laws and regulation.
- 3.4 It is the duty of every Director and employee to inform the Legal Department of the Group immediately should they detect or suspect any violations of the applicable AML/CFT laws in the course of their service with the Group. Any Director or employee who is found to be engaging or assisting in money laundering activities will face criminal proceedings being instituted against them in accordance to the laws applicable on anti-money laundering.

Checkpoint

Scenario

You came across a transaction that appears suspicious due to large payments being made in cash. You are uncertain if the act constitutes money laundering or one that is bona fide – what should you do?

Ethical course of action

You do not need to furnish evidence beyond reasonable doubt to validate your suspicion. If there are any grounds to suspect the transaction may be linked to the proceeds of an unlawful activity, you are required to notify the Legal Department with details thereof. Once a notification has been made, ensure the matter is kept confidential.

4.0 ANTI-CORRUPTION, BRIBERY AND ABUSE OF POWER

- 4.1 Directors and employees shall not, in any circumstances, be involved in any form of acts of corruption or bribery, either directly or indirectly as follows:
 - 4.1.1 give or receive any form of gratification including agreeing to accept or attempting to obtain, from any party, for themselves or for any other party;
 - 4.1.2 give or receive gifts, entertainment and/or sponsorship not in accordance to the Group's policies as well as any applicable anti-corruption laws;
 - 4.1.3 abuse of power; or
 - 4.1.4 make false claims by themselves or through a third party with intent to deceive or mislead.
- 4.2 Directors and employees shall not, in any circumstances, give or offer to give any bribe or gratification to any party as an incentive or a reward for doing or forbearing to do, or for having done or forborne to do any act in relation to Group's affairs or businesses, or for showing or forbearing to show favour or disfavour to any person in relation to Group's affairs or businesses.
- 4.3 Directors and employees shall refrain from any activity or behaviour that could give rise to the perception or suspicion of any corrupt conduct or the attempt thereof in their official capacity as well as well as outside of work so as to protect the good name of the Group.
- 4.4 Directors and employees shall not, accept or obtain, directly or indirectly, any commission, discounts, secret profits or any other benefit (cash or in-kind) in respect of any goods or services sold or purchased or other businesses with the Group.
- 4.5 Directors and employees shall not provide facilitation payment to any local or foreign officials with a view of expediting a routine business action for the Group. Any requests for facilitation payment should be refused without exception and reported to the Legal Department.
- 4.6 Directors and employees shall not use their position for any gratification or benefits, whether for themselves, family members, or any persons with close personal relationship, when making business decisions for the Group, in which they have interest in, directly or indirectly.

- 4.7 It is the responsibility of all persons to report such solicitations of bribes or gratifications to the Audit Committee of HAMSMB and an officer of the Malaysian Anti-Corruption Commission or to a police officer. It should be noted that it is an offence under **Section 25(1) of the Malaysian Anti-Commission Act 2009** on the failure of any persons to report to the authority when they have been solicited, whether directly or indirectly, for any bribe or gratification, whether received in their official capacity or in the course of their employment or outside of work.

Checkpoint

Scenario

You have been approached by a retailer who is interested in the retail space available for lease by the Group. As the market is saturated, the selection of the potential retailers is of little concern to the Group. The retailer states that he will direct a 10% commission to you if you may manage to lobby for the retailer to obtain the lease for the retail space.

Suggested course of action

You should reject the commission offered from the retailer as there is a clear intention to bribe which will influence your judgement so as to procure a business advantage. In addition, it is incumbent on you to report the solicitation of bribe to the Audit Committee of HAMSMB as well as to the Malaysian Anti-Corruption Commission or Police. Failure to do so on your part would constitute an offence in accordance to **Section 25(1) of Malaysian Anti-Commission Act 2009**.

5.0 GIFTS, ENTERTAINMENT, SPONSORSHIP & DONATION

- 5.1 As a general principle, all Directors, employees and their family members shall not give or receive any gifts and/or sponsorship to or from third party/parties. All Directors and employees shall immediately decline or return any gifts and/or entertainment should they be offered by third party/parties.
- 5.2 Only in very limited, rare and defined cases is it permissible for Directors and employees to give or receive any gifts and/or sponsorship such as during festive seasons or during any promotional activities or where refusal of such gifts and/or entertainment might be taken as a gesture of disrespect. Such gifts, entertainment and/or sponsorship may be given or accepted if the quantum is below the nominal value and the provision and acceptance is done in a bona fide manner.
- 5.3 All gifts and/or sponsorship given or accepted in accordance to Paragraph 5.2 shall be declared and approved by the appropriate level of Management depending on the value of such gift(s).
- Below RM 300 ---> Not required to declare
 - Above RM 300 ---> Declaration to be made to Group Human Resource Department
 - Above RM 500 ---> Declaration to be made to Chief Executive Officer/Chief Corporate Officer.
 - Above RM 2,000 ---> Strictly prohibited

Declarations should be made on the nature of the gift, relationship between the receiver and giver as well as the estimated value of the gift(s). As for sponsorships, utmost care

must be taken to ensure that they are not used as a subterfuge for bribery, either where given or received.

- 5.4 The Group recognises that in the course of business the act of entertaining business associates and partners are an industry norm, and this might not be subjected to the provision in Paragraph 5.3. However, utmost care shall be taken to ensure that the nature of such entertainments is not inappropriately lavish or excessive, they are not frequent or reflect a pattern of frequent acceptance from the same person or entity and the entertainment does not create the appearance of an attempt to influence any business decisions.
- 5.5 In addition to the above, gifts and/or entertainment to be given or received by Directors or employees should strictly be rejected if the intention of such proceeds is to:
 - 5.5.1 influence any present or future act or decision by that Director or employee; or
 - 5.5.2 induce such Director or employee to perform or omit any act in violation of his proper duties and responsibilities; or
 - 5.5.3 induce such Director or employee to use or direct any other person to use his influence with a government, or any of its representatives, divisions or agencies to affect or influence any act or decision of any such government, representative, division or agency and in any or all of the above cases, for the purposes of expediting, benefiting, prejudicing or affecting in any way whatsoever whether directly or indirectly, the business dealings or relationship of the giver with the Group.
- 5.6 Any gifts and/or entertainment which are deemed to be unacceptable by the Director or employee shall be:
 - 5.6.1 returned to the giver where practicable; or
 - 5.6.2 where such gifts or entertainment could not be returned to the giver due to impracticability, the said Director or an employee shall reimburse the giver for the gifts or entertainment received in the full amount.
- 5.7 When providing or according gifts, entertainment and/or sponsorship to any recipients in accordance to the Group's policy, utmost care will have to be taken to ensure that the gifts, entertainment, and/or sponsorship conform to the recipient's rules and policy on gift, entertainment and sponsorship and with reference to Paragraph 5.3 of the Code.
- 5.8 Directors and employees should not give or accept gifts or any other benefit or privilege that would in any way influence or appear to influence any business decision or gain an unfair advantage. It shall not be related to any contractual negotiations, tender awards or any other similar circumstance.
- 5.9 In relation to dealings with government officials and political parties:
 - 5.9.1 The Group strives to build transparent and fair relationship with all government agencies and public officials. Appropriate action must be taken to comply with the applicable laws and regulations as well as the Group's relevant policies and procedures.
 - 5.9.2 The provision of any gifts, entertainment and/or sponsorship to government agencies and public officials are generally prohibited unless it adheres to the provisions as follows: -

- 5.9.2.1 during any festive seasons or any other token of appreciation that is below the nominal value.
- 5.9.2.2 in accordance to the Guidelines in the Service Circular No.3 of 1998 and the gift enquiry by MACC.
- 5.9.3 Directors and employee are strictly prohibited from either directly or indirectly offering, promising, providing, receiving or agreeing to receive any form of gifts, entertainment, contribution, donation or sponsorships to or from any politicians, political parties, political party officials, candidates for political office or individuals or group or individuals possessing political or governmental relationships or intentions.
- 5.10 Charitable donations are part of the Group's commitment to society and represent a way of contributing to worthy causes. However, it should be noted that even legitimate donations may in certain instances have the risk of creating the appearance of bribery and corruption. Hence, it is incumbent on Directors and employees to ensure that donations on behalf of the Group are made through legal and proper channels including authorisation based on the Delegated Approval Limits.
- 5.11 In providing donations, care must be taken to ascertain that the charity organisations on the receiving end are valid/registered entities and the contribution will be used for the intended purpose. Caution must be exercised in making donations to organisations that have links to government officials or their families, as this could be seen as an act of favour with the purpose of influencing the official's decision for the benefit of the Group.

Checkpoint

Scenario

You received a request for donation from an organisation which is based in a high risk country and has affiliation with a domestic public official. The organisation claims to be a well-established entity with adequate organisational structure to guarantee proper administration of the funds. It was also asserted that donors to the organisation typically benefit from reputational mileage.

Suggested course of action

You should exercise professional scepticism in assessing the request and seek further advice from the Legal Department so as to ascertain if the request for donation is a potential guise for corruption. Any request for donation can only be escalated for internal approval once the due diligence process is completed by the Legal Department.

6.0 PERSONAL SOLICITATION

- 6.1 Directors and employees are strictly prohibited from soliciting for business either for monetary or non-monetary purpose, for themselves and/or on behalf of another party or organisation during office hours which is not for the benefit of the Group. The prohibition on solicitation extends amongst others to clients, agents, vendors and contractors.

7.0 DRESS CODE

- 7.1 All employees are expected to be dressed appropriately to reflect the standards and professionalism of Group. Employees are required to manage their image and to be groomed to reflect a professional corporate image, which includes maintaining a neat, clean and tidy appearance which suits the professional image.

7.2 In order to avoid a broad interpretation on what is acceptable as an appropriate attire, the following shall act as a guideline for employees to adhere to:

For Male	
Appropriate Business Attire	Inappropriate Business Attire
<ul style="list-style-type: none"> ● Collared long-sleeved shirts ● Tie (optional when in office) ● Dark, long pants ● Leather shoes with appropriate socks length and colour 	<ul style="list-style-type: none"> ● T-shirts, clothing with offensive / inappropriate words or pictures ● Torn, dirty, scuffed or frayed clothing ● Gym clothes or athletic wear ● Jeans, shorts, three quarter pants, sweatpants, or Bermuda shorts ● Slippers/ flip-flops ● Casual shoes

For Female	
Appropriate Business Attire	Inappropriate Business Attire
<ul style="list-style-type: none"> ● Business jacket and matching skirt suits or pants ● Formal & decent blouse ● Tailored dresses ● Knee length skirts & dresses ● Covered shoes ● Flats ● Heels/ Pumps 	<ul style="list-style-type: none"> ● T-shirts, clothing with offensive / inappropriate words or pictures ● Torn, dirty, scuffed or frayed clothing ● Gym clothes or athletic wear ● Inappropriate or revealing clothes/ dresses – plunging necklines, halter- neck, spaghetti straps ● Thin layer, skin-tight stretchy or see- through material: - legging / jegging / tights ● Leather tight skirts or pants ● Short skirts / mini skirts ● Slippers, flip-flops

- 7.3 Employees are allowed to dress down (business casual) on Fridays provided they are based in office and will not be meeting with clients or people external to the Group and are not attending a function, meeting or event where they will be representing the Group. The following serves as a guide for employees on what constitutes as business casual:

For Male	
Appropriate Business Casual Attire	Inappropriate Business Casual Attire
<ul style="list-style-type: none"> • Smart jeans (non-faded or torn/ripped) • Khaki pants • Short-sleeved collared shirts • Collared T- shirts • Smart and clean casual shoes 	<ul style="list-style-type: none"> • Clothing with bold and/ or offensive motifs / logos • Non-collared t-shirts • Torn / Faded jeans, skinny denim, leather or vinyl • Sweat shirts, hooded tops, jerseys • Sandals, flip flops/slippers, hiking • Bermudas / Shorts • Dirty or smeared shoes

For Female	
Appropriate Business Casual Attire	Inappropriate Business Casual Attire
<ul style="list-style-type: none"> • Blouse • Knee length skirts and dresses • Smart jeans (non-faded or torn/ripped) • Pants or trousers • Collared T- shirts • Sweater or Cardigan • Flats • Smart and clean casual shoes 	<ul style="list-style-type: none"> • Clothing with bold and/ or offensive motifs/logos • Halter tops/Tube tops • Non-collared t-shirts • Torn / Faded jeans, skinny denim, leather or vinyl, leggings/tights • Mini-skirts or skirts shorter than mid-thigh • Shorts • Revealing clothing, e.g see through or low cut / backless tops or dresses • Platforms / Stilettoes • Sandals, flip flops/slippers • Dirty or smeared shoes

- 7.4 Employees who are attending the Group's official events shall wear attire as required for the event as per the specified dress code. If no dress code is set, employees may wear attire that is appropriate for the event.

8.0 HEALTH AND SAFETY

- 8.1 The Group aims to promote a safe and hazard-free work environment for Directors, employees, contractors, suppliers, vendors and any other Third Party.
- 8.2 The Group shall operate in an environment that adheres to the **Occupational Safety and Health Act 1994** and shall strive to improve the safety regulations.
- 8.3 Employees shall contribute by creating a safe working environment by promptly reporting accidents, injuries, and unsafe equipment, practices or conditions to their superior or any other designated persons as appointed by the Group.
- 8.4 Employees shall also report to work free from the influence of any external substance that could prevent them from conducting work activities safely, effectively and in good health.
- 8.5 The onus is on the employees to declare immediately any dangerous and contagious disease, that he is afflicted with to his superior or any other designated persons appointed by the Group.

9.0 DRUG, ALCOHOL AND PROHIBITED SUBSTANCES

- 9.1 All employees are strictly prohibited from any usage, possession, distribution or sale of drugs, alcohol or any other prohibited substances while on the Group's premises, in control of the Group owned vehicles or while discharging their duties in their official capacity and/ or when they are representing the Group.
- 9.2 Any employee, who is suspected to be under the influence of drugs, alcohol or any other prohibited substances, shall be required to undertake a special test at the Group's panel of clinics or government clinics or hospitals.
- 9.3 A positive outcome of the test or non-compliance with the mandated test or the Group's medical procedures would cause grounds for disciplinary action.

10.0 SEXUAL HARRASMENT

- 10.1 It is the policy of the Group to promote a safe and healthy working environment that fosters mutual respect where individual employees irrespective of status or position are treated with dignity and free from any for or manner sexual harassment.
- 10.2 Directors and employees are strictly prohibited from engaging in any form of harassment, humiliation and intimidation of a sexual nature.
- 10.3 Definition of sexual harassment

For the purpose of this Code, Sexual Harassment is defined as:

- 10.3.1 Any unwanted conduct of a sexual nature having the effect of verbal, non-verbal, visual, psychological or physical harassment:
 - (i) that might, on reasonable grounds, be perceived by the recipient as placing a condition of a sexual nature on his employment;
 - (ii) that might, on reasonable grounds, be perceived by the recipient as an offence or humiliation, or a threat to his wellbeing. but has no direct link to his employment.

- 10.4 Sexual harassment can occur between individuals of different sexes or of the same sex.
- 10.5 Based on the above definition, sexual harassment may be divided into two categories, namely sexual coercion and sexual annoyance.
- 10.5.1 Sexual coercion is sexual harassment that results as a direct consequence to the victim's employment. An example of sexual harassment of this coercive kind is where a superior, who has power over salary and promotion, attempts to coerce a subordinate to grant sexual favours. If the subordinate accedes to the superior's sexual solicitation, job benefits will follow. Conversely, if the subordinate refuses, job benefits are denied.
- 10.5.2 Sexual annoyance, the second type of sexual harassment is sexually-related conduct that is offensive, hostile or intimidating to the recipient, but nonetheless has no direct link to any job benefit. However, this conduct creates a bothersome working environment which the recipient has to tolerate in order to continue working. Sexual harassment by a Director or an employee against a co-employee falls into this category. Similarly, harassment by a Director or an employee towards stakeholders during the course of work also falls into this category.
- 10.6 Sexual harassment in the workplace can also include any employment-related sexual harassment occurring outside the workplace as a result of employment responsibilities or employment relationships. Situations under which such employment-related sexual harassment may take place include, but are not limited to the following:
- (i) at work-related social functions;
 - (ii) in the course of work assignments outside the workplace;
 - (iii) at work-related conferences or training sessions;
 - (iv) during work-related travel;
 - (v) over the phone; and
 - (vi) through electronic media.
- 10.7 It is essential to emphasise that sexual harassment refers to sexual conduct whether explicit or implied, which is unwanted and unwelcome to the recipient. It is also a sexual conduct which is imposed on and unsolicited or unreciprocated by the recipient.
- 10.8 Forms of sexual harassment

Sexual harassment encompasses various conducts of sexual nature which can manifest themselves in five possible forms, namely:

- (i) Verbal harassment: e.g. offensive or suggestive remarks, comments, jokes, kidding teasing, sounds, inquires or discussion about sexual activities or verbal abuse.
- (ii) non-verbal/gestural harassment e.g. leering or ogling with suggestive overtones, licking lips, holding or eating food provocatively, hand signal or sign language denoting sexual activity, persistent flirting;
- (iii) visual harassment e.g. showing pornographic materials, writing sexually suggestive letters or other written materials, sexual exposure;
- (iv) psychological harassment e.g. repeated unwanted social invitations, proposals for dates or physical intimacy; and

- (v) physical harassment e.g. inappropriate touching, patting, pinching, stroking, grabbing, hugging, kissing, fondling, brushing up against the body, or sexual assault.

11.0 NON-DISCRIMINATION

- 11.1 All Directors and employees should respect the rights and cultural differences of other individuals in the Group. The Group is an equal opportunity employer and will not discriminate against any employee or applicant because of race, age, sex, religion, caste, material status and disability.
- 11.2 This policy applies to all terms and condition of employment, including, but not limited to, hiring, placement, promotion, termination, layoff, recall, transfer, leave of absence, compensation and training. Discrimination and prejudice constitute as unacceptable behaviour within the Group's premises and anyone found guilty of such will have serious action against them.

12.0 CONFLICT OF INTEREST

- 12.1 All Directors and employees are expected to exercise caution and business prudence in conducting the day to day affairs of the Group and any business decisions made should consider the best interest of the Group.
- 12.2 At all material times, Directors and employees shall avoid any conflict of interest situations which may, directly or indirectly, in the course of discharging their duties or outside of work, have the potential to interfere with their objectivity in performing duties or exercising judgement on behalf of the Group.
- 12.3 A conflict of interest might arise in instances where personal interests and relationships, impair or appear to impair, the independence of any judgement in which the Directors or employees may need to make in discharging his duties to the Group. This includes, but not limited to:
 - 12.3.1 receiving or giving of gifts or entertainment as a result of the Directors or employee's position with the Group may cause conflict of interest situations. Refer to the Paragraph 5.0 for further details;
 - 12.3.2 a Director or Employee in a position to influence decisions that are made by the Group with respect to dealings with a business, enterprise or entity owned or partially owned by the employee, the employee's family member, friend or those with whom he/she has a close personal relationship with; or
 - 12.3.3 a Director or an Employee competing with or against the Group in a business transaction.
- 12.4 Directors and employees shall not have a direct or indirect involvement in the following:
 - 12.4.1 to establish any incidental business with external or internal parties involved in a project or collaboration of the Group under any circumstances e.g. with the business partners, contractors or suppliers, during or after leaving employment with the Group. Directors and employees shall not use the contacts or business information established from such transactions or business during their tenure with the Group to establish their own business;
 - 12.4.2 being involved in any business dealings or transactions that compete with or is conflicting with the interests of the Group;

- 12.4.3 being involved in any of the Group's business dealings or transactions in which any family members, acquaintance or those with whom he has a close personal relationship with or has a direct or indirect interest in; and/ or
- 12.4.4 being in contractual or non-contractual employment with another person/company/ organisation with any form of remuneration or consideration given in exchange for such services.
- 12.5 Employees are only allowed to be involved in the following outside office hours, provided it does not affect the employees' work performance and is within the ambit of the law:
 - 12.5.1 charitable work involving social, welfare, education;
 - 12.5.2 religious, cultural, sporting activities
 - 12.5.3 political activities (as guided in paragraph 12.6); and
 - 12.5.4 memberships in recognised professional or industry bodies and any attendant office bearer position helmed shall be approved by Management or the Board, as the case may be.
- 12.6 Directors and employees shall have the right to participate as individuals in the political process. Participation in the political process shall be on the own volition of Directors and Management. Political opinions must be clearly delivered as personal opinions and not representative of the Group's position. A Director or employee who wishes to hold any key position as office bearer in any political party must disclose and obtain prior approval from Management and/or Board, as the case may be. Employees who wish to be nominated as candidates in any election or are elected as representatives in the Federal or State Legislative Body must resign from the Group.
- 12.7 Directors and Management shall abstain from participating in any of the Group's decision making or deliberations where the subject matter in question involves a conflicting matter for the Directors and Management. Directors and Management shall not participate in any activities which could influence the decisions on such dealings.
- 12.8 As it is impossible to describe every potential conflict of interest, it is the responsibility of Directors and employees including Management to exercise good judgement, to seek advice when appropriate and adhere to ethical standards in discharging their duties to the Group.
- 12.9 Directors and employees including Management shall disclose any contractual interest, whether direct or indirect, to the Group as and when it arises in accordance to the Group's policies.
- 12.10 Where a relationship does not come within the definition of family members or close personal relationship as outlined in the "Definition" section, the Director or employee shall be required to declare his conflict of interest (if any), if such conflict of interest arise in the course of carrying out his duties and functions to the Group.
- 12.11 The declaration of conflict of interest should be made in writing and shall include the fact, nature and extent of conflict as well as relationship between the parties to the appropriate level of management which are as below: -
 - 12.11.1 For employees, they should report to their immediate superior and where necessary to the Group Human Resource Department.

12.11.2 For Director(s), he shall declare the same to the Board of Directors and such declaration shall be documented and he shall also abstain from any deliberations, negotiations, or any other affairs regarding the matter, including making decisions as per paragraph 12.6.

12.12 With regards to HAMSB as the manager of Hektar REIT, it should be noted that an Audit Committee should be established for listed issuers pursuant to **paragraph 15.09 of Listing Requirements**, and among the functions of the Audit Committee would be to review any conflict of interest situations that may arise with the listed issuer. As such, conflict of interest situations should be brought to the attention of the Audit Committee of HAMSB in a timely manner.

Checkpoint

Scenario

Your acquaintance would like to apply for a job with the Group and he has requested for your assistance.

Suggested course of action

You may recommend the Group as a great place to work and provide guidance or direction on the application process. However, you must ensure that you are not involved in the recruitment process and the job role in question is not within your chain of command.

13.0 BUSINESS COMMUNICATION

13.1 Directors and employees shall not, either orally, in writing or in any other form, make any public statement or comment on policies, decisions, events, measures or issues of the Group to any person, organisation or institution nor shall he circulate any such statements made by him or by anyone else, whether told in confidence or otherwise, that could unfavourably affect the Group's reputation.

13.2 Directors and employees shall not, except where approved by the Group, discuss, explain, issue, make or distribute any public statement either orally or in writing, in respect of matters pertaining to: -

13.2.1 codes, policies, programs, secrets or results of the Group;

13.2.2 departmental matter in which the employee is working in or has worked in;

13.2.3 any action taken by the Group in relation to any official matter that involves the concerned Director and employee; and

13.2.4 any other confidential matters and/or inside material information in relation to the Group, of which the Director and employee might come in contact with in their course of service with the Group.

13.3 In the event employees are approached by any member of the media for any information, statement, opinion, comments or news about the Group, it is the duty of the employee to inform and/ or refer the matter to the immediate superior. The superior shall then escalate the issue to Management for further action and issue an appropriate response accordingly.

- 13.4 In using private social media account, Directors and employees must ensure that any posts made reflect only personal opinions and do not adversely affect the perception of the Group.

14.0 PUBLIC APPEARANCE AS A GUEST SPEAKER OR PANEL MEMBER

- 14.1 Any Director or employee who has been invited to appear as a guest speaker in a public and/ or private events/ forum must, if he intends to make such appearance, submit the details and/or the topic(s) of his proposed speech to the management for their consideration. Directors or employees may only make such appearance if prior approval has been obtained.
- 14.2 All Directors or employees who have been invited to make such appearances as above, either in their own personal capacity or as the representatives of the Group must ensure that their thoughts, words and actions are not detrimental in tarnishing, or portrays the Group's image and interests in an unfavourable light.

15.0 PROTECTING GROUP ASSETS

- 15.1 Directors and employees shall, at all times, protect the Group's assets, both tangible and intangible assets from wastage, loss, vandalism or damage, misuse, theft, misappropriation or infringement of Intellectual Property rights and ensure these assets are used in a responsible, legal and prudent manner. Directors and employees shall not misuse the Group's assets for their own personal interest or for the purposes of any illegal activity.
- 15.2 Directors and employees are responsible for the protection of all the assets used in carrying out their responsibilities and for taking reasonable steps to prevent theft or misuse of, or damage to, such property.
- 15.3 Directors and employees shall ensure that all expenditures and usage of funds are made accurately. No secret funds or profit from the Group's money or other assets for unauthorised or unlawful purposes is allowed for any purpose whatsoever. Directors and employees shall also ensure that all expenditures are transacted in a transparent manner and is properly documented.
- 15.4 Directors and employees shall be responsible for all the assets of suppliers/vendors that are entrusted under their care and Directors and employees shall treat those items with the same level of care as with all other physical properties belonging to the Group.
- 15.5 Directors and employees shall use the Group issued laptops and any mobile devices as directed and shall not use any external and unapproved materials/ software/ hardware or access restricted websites or domains. Directors and employees shall comply with all the policies related to the usage of computers and information technology and its amendments from time to time.

16.0 MINOR MISCONDUCT AND SERIOUS MISCONDUCT

- 16.1 In addition to the breaches outlined in this Code, the Group may take disciplinary action against the employee if found to be guilty of other forms of minor misconduct or serious misconduct
- 16.2 The following are non-exhaustive list of acts that constitutes as minor misconduct:
- 16.2.1 wasting time without doing any work or deliberately delaying work completion;

- 16.2.2 stopping work before the time required or in an inappropriate way without permission;
 - 16.2.3 absence from duty or place of work without proper reason or authorisation, repeated lateness for work, absenteeism without just cause, leaving the office early before the end of the official working hours without permission;
 - 16.2.4 empty chatter which disrupts the completion of work of the employee or other employees;
 - 16.2.5 smoking in prohibited/restricted areas;
 - 16.2.6 answering phone calls in a rude manner, using coarse language or in other inappropriate manner;
 - 16.2.7 repeated carelessness in record-keeping duties with regards to filing of paperwork and other relevant forms in the course of employment;
 - 16.2.8 abusing the use of the Group's vehicles by providing lifts to non-employees or employees unrelated to the duties requiring the use of the Group's vehicle;
 - 16.2.9 creating a nuisance and disturbances on the Group's premises; and
 - 16.2.10 refuse or failure to report to the Group about the damage or destruction to the Group's assets including the malfunction or weakness of any machinery and equipment at place of work.
- 16.3 The following are examples of serious misconduct which shall institute disciplinary proceedings that can lead to an employee's dismissal from employment if convicted:
- 16.3.1 any acts in contravention with the instructions given by the Group;
 - 16.3.2 willful insubordination, blatant disregard of directives by superiors and/ or by the management, acting in adverse to the Group's values and policies;
 - 16.3.3 repeated misconduct even after warning letter has been issued;
 - 16.3.4 repeatedly leaving the workplace or leaving before the end of working hours without prior permission and even after due warning given and reprimanded by the superior and/or management;
 - 16.3.5 repeatedly providing short notice for any absences from work;
 - 16.3.6 repeated lateness for work or absenteeism without just cause or without any attempt to inform the superior and/ or management;
 - 16.3.7 falsifying or being an accomplice to falsification of work attendance records;
 - 16.3.8 refusal to cooperate with other employees resulting in the failure to achieve the required standard of performance for any and all duties to the Group;
 - 16.3.9 influencing other employees or personally delaying the completion of work or not making efforts to complete the work required within the specified timeline;
 - 16.3.10 making false claims or false statements in any forms with regards to the Group's expenses;
 - 16.3.11 embezzlement of the Group's money, not remitting the income of the Group within the allotted time, false or inaccurate recording of expense details, negligent or intentionally causing loss to Group or abetting others in similar malicious pursuits;
 - 16.3.12 bringing outside influences onto the Group's premises with malicious intent;
 - 16.3.13 convicted in a court of law either in Malaysia and/ or any other jurisdiction for any criminal offence;

- 16.3.14 being involved in any serious offence under the law;
- 16.3.15 conducting a meeting or meetings or assemblies on the Group's premises without prior permission;
- 16.3.16 being present, perform or be involved in an immoral act at places which are prohibited or deemed illegal by the local laws or in contrary to the Group's policies which could undermine the good name and reputation of the Employee or the Group;
- 16.3.17 being present, perform or be involved in a picket, illegal strike or inciting other Employee to launch or participate in a picket or illegal strike which is not in accordance with the laws;
- 16.3.18 falsifying, amending or being an accomplice to falsification or amendment of the contents of any document with the intention to cheat, reveal or conceal an improper act or fact;
- 16.3.19 giving permission to specific person who are not Employees to use the Group's property or facility without appropriate clearance from the management;
- 16.3.20 theft or dishonesty including any attempt to improperly use the Group's products, facilities and property for personal gain;
- 16.3.21 abuse of Group's name for personal gain;
- 16.3.22 not reporting or preventing the report of an accident involving the Group's vehicles or attempting to conceal such an incident from the Group;
- 16.3.23 picketing, conducting an illegal strike or influencing other Employees to conduct a strike that is in contravention with the local law and regulations;
- 16.3.24 sabotaging or tampering with the Group's assets including machinery or equipment which is detrimental to the Group;
- 16.3.25 sleeping or loafing during working hours;
- 16.3.26 destroying or concealing the Group's documents, confidential or otherwise without prior permission;
- 16.3.27 refusal or failure to attend a health check if required by the Group;
- 16.3.28 any other conduct deemed by the Group to be in contravention with the Group's values and this Code; and
- 16.3.29 breach of any terms of employment, the Group's policies and procedures, guidelines, memorandums/ circulars or other forms of communication used by the Group to disseminate the Group's requirements of its Employees.

17.0 REPORTING VIOLATIONS OF THE CODE

- 17.1 It is the responsibility of every Director and employee to report any misconduct by any other Director and employee to the Group Human Resource Department. The Group Human Resource Department shall then use their discretion to report such cases to the relevant authorities where circumstances require them to do so. For example, cases involving bribery, corruption and abuse of power should also be reported to the Malaysian Anti-Corruption Commission whilst theft, fighting and drug abuse cases shall be reported to the Royal Malaysian Police.
- 17.2 When an employee is found to be derelict or acting in contrary to any of the Group's Code, policies, terms and conditions of service or any rules as determined or issued by the Group, the superior or immediate supervisor shall immediately report by way of verbal or written communication to Group Human Resource Department. A verbal report shall be followed by a written report by the person who reports such breach. The superior or

immediate supervisor shall co-operate with Group Human Resource Department and whoever is assigned by the Management to conduct the investigation in relation to the report. The said superior or immediate supervisor who fails to comply with this paragraph shall be deemed to have committed an offence and a disciplinary action may be taken against such superior or immediate supervisor. Breaches of the stipulations in the Code by a Director shall be dealt with by the Board.

- 17.3 Failure by any parties within Group to report a known violation of the Code is a violation on itself. Any party who wants to report any violations or suspected violations of the **Code** can report such violation via the whistleblowing channels as outlined in the Group's **Whistleblowing Policy** and such report shall be investigated accordingly.
- 17.4 The whistleblowing channel is established to provide an avenue for both employees as well as external parties to disclose any acts or wrongdoing and to be assured that reporting person be protected from any form of reprisals, discrimination or victimisation for whistleblowing in good faith.
- 17.5 The purpose in requiring a report is to permit Management to undertake all remedial actions that may be necessary to avoid future violations as well as to have clear documentations of the report. Reporting allows doubtful issues on compliance with the law or the **Code** to be resolved on the basis of legal advice. The Group shall protect and safeguard the confidentiality of the Report as well as the identity of the Reporter. Details of any reported violation shall be protected and safeguarded in accordance with the provisions of the applicable laws and regulations pertaining to whistle-blower protection. Further reference can be made to the Group's **Whistleblowing Policy**.

18.0 DISCIPLINARY PROCEEDINGS

18.1 Inquiry

- 18.1.1 Where there had been an official complaint lodged and/or received by the Group Human Resource Department of a **serious misconduct** against an employee, a panel shall be constituted at the discretion of the Group to conduct such inquiries. The inquiry panel shall consist of 3 members (as determined by the Group). The constituted panel should not include member(s) whose presence may affect the impartiality of the panel in its conduct of the proceedings and its recommendations.
- 18.1.2 The Group may suspend an employee on half month's pay for a period not exceeding two (2) weeks pending an inquiry.
- 18.1.3 The inquiry panel, within two weeks of its constitution shall commence its investigations, conduct interviews with the relevant parties and their superiors and if needed, order for any records and documents to be produced to assist them during the inquiry.
- 18.1.4 All proceedings and findings of the inquiry shall be documented for record purposes and shall be kept confidential. The inquiry panel can make recommendations as they deem fit in light with the Group's values and policy and the recommendation(s) by the panel shall be submitted to the Group Human Resource Department and to the Management/Board for further action.

18.2 Actions by the Group

- 18.2.1 Once the inquiry panel has concluded their investigation and made their findings and recommendation to the Group Human Resource Department and/or to the Management/ Board, the Group shall take action in line with the

recommendations made by the inquiry panel or impose sanctions as they deem fit in line the Code and the Group's policy;

18.2.2 Depending on the gravity of the offence committed, the recommendations made against the employee may be subject to any of the following repercussions;

- 18.2.2.1 Summary Dismissal
- 18.2.2.2 Demotion in job title and job scope
- 18.2.2.3 Suspension without pay up to a maximum of two (2) weeks
- 18.2.2.4 Withholding of increment and/ or bonus
- 18.2.2.5 Withholding of promotion
- 18.2.2.6 Reduction in salary to reflect the demotion in para 18.2.2.2
- 18.2.2.7 Written warning

18.2.3 In addition to the above as outlined in Paragraph 18.2.2.7, all Heads of Departments may issue written warnings to their direct reports on the advice of the Group Human Resource Department. All written warnings shall be recorded in the employee's personal file. In the event where three (3) warning letters have been issued within a period of twelve (12) months, the employee concerned shall be subject to an inquiry to determine whether further disciplinary action should be taken against them.

18.3 Right of Appeal by employee

18.3.1 If the employee is not satisfied with the decision or disciplinary action undertaken by the Group, the employee may submit a written appeal addressed to the Group Human Resource Department, within thirty (30) days from the date of the notice of disciplinary action by the Group is communicated to the employee.

19.0 EMPLOYEES' RIGHT TO A FAIR HEARING

19.1 Notwithstanding Paragraph 16.0, no employee shall be found guilty of any of the misconduct as detailed in Paragraph 16.0 unless he has been provided with a show-cause notice of the allegations and/or complaint against him and he shall be given a fair opportunity to explain or defend himself in this respect.

19.2 Paragraph 18.3 shall not be applicable in the following situations:

19.2.1 if an employee's employment contract is terminated due to conviction in a court of law for involvement in criminal activities; or

19.2.2 the Group deems that the written explanation or defence to be provided under Paragraph 18.3 is not practical to be implemented.

20.0 TERMINATION OF SERVICES

20.1 All notice of termination of service to employees shall be made in writing and in accordance with the employees' terms of employment.

20.2 In lieu of such notice by either the Group or the employee, the forfeiting party shall pay a sum equivalent to the salary for the notice period required. However, if the termination is due to summary dismissal from the outcome of the disciplinary proceedings as outline in Paragraph 18.2.2.1, then the Group is not required to provide such notice and

the Employee concerned will be asked to leave with immediate effect.

- 20.3 The employee shall surrender all of the Group's documents, files, vehicles, keys, uniform, ID tag and property belonging to the Group in his possession upon termination of service.
- 20.4 The employee shall reimburse the Group for the value of the replacement cost for any item(s) or the property of the Group that is lost or destroyed while under his or her custody.
- 20.5 The employee shall settle all outstanding liabilities and obligations with the Group before any monies due to him are to be released.

21.0 TRAINING FOR DIRECTORS AND EMPLOYEES

- 21.1 All Directors and employees of the Group shall be made aware of the Code and its content upon the commencement of their service or employment with the Group, and this shall form part of the Induction Programme.
- 21.2 The Group's Code shall be made available to all persons as well as access to the online version of the Code which shall include regular updates and refreshers to reflect any changes.

SECTION IV: DECLARATION OF COMPLIANCE

I, [Name & Identification Number] _____ of [Dept/Unit/Branch] _____, declare that I have read and fully understood the Group's Code of Ethics and Conduct and undertake to comply by its terms as well as the terms of other policies and procedures of the Group, for the time being in force and as may be adopted from time to time.

I understand that strict compliance with all these policies and procedures of the Group and any other applicable regulatory rules and regulations that may be notified to me from time to time shall constitute as condition of my employment with the Group.

I also understand that any breach of these policies and procedures shall render me liable to any disciplinary actions by the Group, including dismissal from service.

Signature of Employee :
Staff No :
Designation :
Date :