



Composites Technology
Research Malaysia

Code of Conduct (Kod Tingkahlaku)

The company reserves the right to amend, add or delete clauses in this handbook at its discretion. Any revisions to the rules made will supersede the current ones and only the latest revisions are applicable.

Revised on August 2025

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FOREWORD TO EMPLOYEES

This Code of Conduct (the “Code”) contains policies and guidelines relating to the standards of conduct and ethics that all employees are expected to adhere to in the course of performing their work. It is designed to maintain discipline and order in the workplace among employees of all levels. It also sets out the circumstances in which employees would be deemed to have breached the Code and the actions that can be taken against them if they do so.

The specific procedures on the application of the Code will be spelled out in the Company’s policies and procedures manual.

The Company reserves the right to amend, delete or argue any provision in this Code as and when it deems necessary. All policy changes shall be approved by the Management.

DEFINITIONS

The following definitions shall apply unless otherwise expressly stated in the Code:

Company	Composites Technology Research Malaysia (208125-X)
Confidential Information	Any information pertaining to the Company, its business or other matter which:- a) The Company reasonably believes that release of the information will be injurious to it or advantageous to its trade rivals. b) The Company reasonably believes that the information is not already made public; and c) The above two (2) criteria are to be judged in the light of usage and practice in the industry in question.
Employee	A person under the employment of the Company either permanent, contract and temporary employment. Where an employee is employed under a contract, the terms and conditions of his contract shall apply where they differ from the policies in this Code.
HRD	Human Resource Department of the Company in which the relevant employee is under employment.
Prohibited Substances	Alcoholic beverages, controlled substances and drugs (As defined under Dangerous Drug Act 1952) except for those made available to an employee under a doctor's prescription.
Relatives	Parents, brothers, sisters, grandparents, parents-in-law of the relevant employee.
Spouse	An employee's legal wife or husband.

All references of the masculine gender shall include the feminine gender unless otherwise expressly stated. All words importing the singular number shall include the plural number and vice versa.

1. COMPANY NAME AND IDENTITY

The name and logo of CTRM are invaluable and intangible assets that carry the goodwill of the Company. The usage shall be only for official purposes. The corporate name and logo shall be respected, safeguarded and shall not be subjected to personal abuse and it is the responsibility of all employees to:

- i. Maintain and strengthen the image of the Company by inculcating good values, conducting himself/herself in a responsible manner and displaying desirable and positive work behavior at all times;
- ii. Act and be perceived as one team, collective strength is utilized to understand the continuous changing needs of the customer and meet those needs better than any competitors, employees throughout the Company shall understand that employees work for CTRM and share this common goal;
- iii. Not place his/her personal duties above the interest of the Company.

2. COMPANY MISSION AND VISION

1) MISSION

To be the partner of choice in composites and aerospace through the development of people, capabilities and products.

2) VISION

To be the CENTRE OF EXCELLENCE for Composites and Aerospace.

3. COMPANY SHARED VALUES

- 1) Integrity
- 2) Decorum
- 3) Innovation
- 4) Excellence
- 5) Transparency
- 6) Teamwork
- 7) Quality

4. EMPLOYMENT'S VALUES

i) Serve with Purpose

The contract of service or employment has one common denominator: the agreement to employ and the agreement to serve. The agreement by the employee to serve and be employed calls for full commitment, uncompromised integrity and true professionalism to ensure that the interests of the employing organization are protected. The service is based on mutual trust with employee's goals which are aligned with the organization's goals. It is employee's duty to perform well and add value to the organization and the stakeholders.

ii) Work within Bounds

The Employee has to respect the laws, regulations, policies, procedures and system and recognize the levels of authority. More importantly, any conduct must be within bounds of sound ethics and good corporate governance to ensure that misbehaviors are being refrained which can adversely affect the professionalism. Employee cannot be a party to any mischief or allow any abuse to go unchecked.

iii) Upholding of Interest

Organizational interests are paramount and the preservation of these interests must not be challenged. There shall be no other external involvement or business pursuit by an employee that can put the employer under threat or in conflict. A conflict of interest arises when a person in a position of trust has competing professional and/or private interests with the employer. Conflict of interest can also be any situation in which the individual or party is in a position to exploit a professional or official capacity for personal gain. Conflict of interest can be direct or indirect. Some common forms of conflicts of interest are:

- a. Self-dealing or involvement in other capacities or bodies resulting in collision of private and public interest.
- b. Outside employment (including part-time employment) or board appointment that may contradict the current position.
- c. Personal/family interest that may impair business or professional judgments.
- d. Direct/indirect ownership through/by proxy in external company having business relations with employer/related organization.
- e. Side-deals of business prepositions/transactions that would result in his/her personal gains or detriment to the employer.
- f. Undue influence on awards/selection of vendors, contractors, etc. without regard for commercial fairness to derive direct or indirect personal gains.

In personal of above involvements, the onus is on the employee concerned to ascertain that the position sought, ownership contemplated or external interest under consideration are not in conflict or competition with Company, directly or indirectly.

5. INTEGRITY

Employees should remain consistent and honest in dealing with others and to treat people with trust and mutual respect while maintaining transparency.

6. PERSONAL DATA PROTECTION ACT 2010

The Company upholds Personal Data Protection Act 2010. Employee personal data will be processed by the company or other party appointed by the company. The company reserve the right to use employee data for reasonable cause determine by the Company.

7. ASSETS AND PROPERTIES

Employees' Responsibilities

- i. Employee have a responsibility to protect the assests and properties entrusted to employee from loss, damage, misuse, illegal use, theft or any form of vandalism.
- ii. These assets and properties such as funds, products and services, Company vehicles, access and employee cards, office equipments or facilities are meant for business and other purposes approved by Management.
- iii. The employees will not use Company asset and property for personal reasons, or take them out of Company's facilities, unless it is necessary to do our job and with prior authorization, where required. Any private use is only on the basis of privilege arising from an approved entitlement and is not to be taken as an absolute right.
- iv. Assets or properties used by employees for business purposes are for the direct benefit of the Company and to add value to its business. These assets and properties if no longer used must be returned in good condition.
- v. Lights and electrical appliances should be switched off after use and at the end of working hour. Minimal lighting should be used during lunch time.
- vi. Employees should highlight breakdown, failure or damage of Company's equipment and facilities to the appropriate parties for prompt action to be taken.

8. PROFESSIONAL CONDUCT

All employees shall observe and adhere to the highest standard of professional conduct. They should, in all respects and at all times, conduct themselves with integrity, propriety and decorum and must not under any circumstances, commit any act or omission that would bring damage to the Company, its property, reputation or general interests.

Employees are expected to have respect and tolerance for cultures and religions other than those of their own whether locally or overseas and shall conduct themselves in accordance with accepted standards of behavior.

The Company does not tolerate any form of abusive or coercive behavior whether verbal or otherwise, physical violence or sexual harassment among its employees.

9. ATTENDANCE/PUNCTUALITY

All employees are required to observe the stipulated working hours of the Company. If an employee is unable to commence work on time on any particular day, he must inform his immediate supervisor by telephone at the earliest available opportunity and in any event no later than 12 p.m. on that day, or in the case of a shift worker within 3.5 hours after the beginning of his assigned roster.

Late attendance by an employee will be recorded in the respective employee's attendance record maintained by the Company. If an employee is late for work on two (2) or more occasions in a month, a caution letter will be issued by the Company. If the employee persists in late attendance and without good reason, he shall be subjected to disciplinary action at the discretion of the Company. For the purpose of this section, "good reason" shall be construed as a reason which is not, in the opinion of the Company, frivolous, trivial, flippant or inconsequential.

An employee who is unable to attend work because of illness shall inform his superior within 48 hours and must submit his original medical certificate to the Company on the day he returns to work. Unless an employee is on medical leave, he will be required to apply for a full day's leave if he is unable to come to work for more than (3) hours on that particular day.

An employee must not, without good and/or reasonable excuse, absent from work. Such absent if continuous for more than two (2) consecutive working, is deemed to be a breach of contract of employment and the company can take necessary disciplinary action where appropriate and deemed fit against the employee. If an employee is unable to turn up to work for any reason, prior approval for leave from his relevant superior must be obtained. If the employee is unable to obtain such prior approval, he must inform his superior or the HRD of the reason for such absence at the earliest opportunity during such absence.

10. APPEARANCE

All employees must be suitably attired (uniform) and groomed at all times at the workplace, appropriate for their respective positions of employment. Employees are expected to maintain a dignified appearance and be neat, presentable, clean and tidy.

Casual attire including round neck t-shirt, sports shoes, slippers and sandals are not allowed in the workplace during working hours unless permissible by the Company.

11. ALCOHOL AND DRUG ABUSE

Prohibited substances may not be brought, kept, consumed, sold, purchased or dealt with in any way in the Company's premises. Employees shall not report for work or carry out their duties in the course of their employment under the influence of alcohol or drugs of all or any of the above substances. If an employee is taking medication that renders him unable to carry out his duties in a manner that will jeopardize the safety of himself and/ or other employees, he must inform his relevant supervisor or the HR Manager accordingly.

If an employee knows or suspects that any other employee is using, consuming or dealing with any prohibited substances, he must inform his immediate supervisor or the HR Manager immediately. The Company also encourages employees to bring their personal drinking or drug problems to the attention of their supervisor (who shall inform the HR Manager accordingly without delay), or the HR Manager directly. The Company may at its sole discretion and without prejudice to its rights of dismissal, render assistance to an employee who voluntarily submits himself for treatment for such a problem including rehabilitation at an appropriate center for treatment.

The HRD shall be responsible for determining the details of such misconduct or problem and the appropriate action to be taken against the said employee, which may include, reprimand, suspension or dismissal. The HRD may, if it considers appropriate in the circumstances, submit a report of such misconduct to the management together with its recommendation of the appropriate disciplinary action to be taken against the said employee.

12. OTHER EMPLOYMENT/DISCLOSURE OF ASSETS AND OTHER BUSINESS INTERESTS

All employees are required to declare their assets, financial commitments and business interests during the appointment of employment service. This is inclusive of any acquisition or disposal of assets as well as changes to the business interest that may occur in between.

- i. An employee has to give his full commitment to the Company, and is not allowed to conduct his own private business or hold directorship or other positions of another company or organization during his/her employment with the company.
- ii. Should an employee have either direct or indirect shares or other forms of beneficial interest in such entities mentioned above, the employee has an obligation to inform the Company of his interest. The Company will then advise the employee concerned as to the most appropriate way to prevent conflict of interest.

13. BUSINESS ETHICS

i. Misuse of Position

Employees shall not use their position to influence a transaction with the intention to receive benefits or preferential treatment from vendors or contractors or where the employee has financial interest in the vendor company aside from an employee having a financial interest of less than 1% shareholding of a vendor company which is a public listed company.

ii. Gratuities

- a) Employees must not become obligated to any vendor and shall not participate in any transaction in which they may personally benefit. As such, the employee must not offer, solicit or accept gifts or hospitality, benefit, compensation, favors with an expectation that a business advantage will be provided by The Company in return.
- b) The above consideration includes one lump sum or a series of payments (annuity) from vendors or contractors. No gifts beyond those of an advertising nature and of a nominal value.
- c) This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties and the giving or receipt of gifts, provided that this is done in accordance with the Malaysian Anti-Corruption Act 2018.

iii. **Fair Dealing**

Honesty, integrity and trust must be observed in all respect at all times. Employees should endeavor to deal fairly with vendors and should not take unfair advantage of anyone through the manipulation, concealment, abuse of privileged information, misrepresentation of material fact or any other unfair dealing practice.

iv. **Declaration of Interest**

It is the duty of Employees to declare and disclose to Tender Committee, any material facts of relationships that could be expected to give rise to a conflict of interest. In the event that an employee encounters a situation where he or she is doubtful of its implication, the employee should seek clarification from his or her immediate superior.

v. **Contacts and Visits to Vendors and Potential Vendors**

Unauthorized vendor visits or contacts by employees are not encouraged. This will minimize the risk of vendors misinterpreting statements or opinions offered by personnel as commitments.

vi. **Former Employees Representing Vendors**

All DRB-HICOM subsidiaries are prohibited from purchasing from vendors who were former employee or who employ former employees of DRB-HICOM subsidiaries for a period of one (1) year from the time of which the Employee having left DRB-HICOM employment and have access to pricing info only, but having due regards to compliance with the Malaysian Competition Act 2010 and all applicable guidelines thereunder. Any exception to Group Procurement Policy (GPP) must be approved by the Group Managing Director via Bid Waiver.

vii. **Segregation of Duties**

An employee shall not be responsible for more than one of the following functions to minimize the risk of malpractices: -

- a) Preparation of the Purchase Order (PO),
- b) Receiving of goods,
- c) Updating accounting records, or
- d) Processing of payments to the vendor

Control systems must be in place to ensure segregation of duties to eliminate conflict of interest or any possibility of other wrongdoings from occurring.

viii. No Personal Gain

Goods, works and services purchased with Company funds must be used strictly for the Company purposes and not for private purposes.

14. CODE OF ETHICS

A. Commitment

- i. All employees shall, in the course of their employment with the Company and in carrying out their duties and responsibilities in respect thereof, diligently and to the best of their ability to perform such responsibilities as may from time to time be assigned or designated to them.
- ii. All employees are expected at all times to promote and advance the interest of the Company and shall not do anything to bring disrepute to the Company.
- iii. All employees shall obey, comply with and observe rules, regulations, procedures, practices, orders, directives and policies of the Company, whether expressed or implied law or by custom and practice.

B. Confidentiality

- i. No employee is permitted whether during or after termination of their employment with the Company, to discuss or divulge confidential information relating or pertaining to the Company directly or indirectly to any person or company unless:-
 - 1. Such information has previously been made public knowledge: or
 - 2. Upon express direction or with express approval of the Company: or
 - 3. Required, compelled or obliged to do so by law.
- ii. Employees should not discuss whether among themselves or with others, within the workplace or outside the Company's premises, confidential information regarding the Company, its business partners, its customers or clients, its employees or any other confidential information except in the course of carrying out the Company's business.
- iii. It is the Company's policy that any information pertaining to the Company in any way whatsoever and which is not generally available to the public shall be treated with the utmost confidentiality. Such information must not be shared or used by any employee whether directly or indirectly to influence an investment decision in connection with the purchase or sale of securities.
- iv. The first obligation of any employee who receives a subpoena or other request seeking the disclosure of confidential information pertaining to the Company is to contact his immediate supervisor or HR Manager for guidance.

C. Insubordination and Inefficiency

An employee shall not commit any act of willful refusal, insubordination or disobedience of any lawful and reasonable instruction of his supervisor/manager including refusal to perform work assigned, being inefficient and deliberately slowing down of work causing the quality and/or the quantity of work to be adversely affected.

D. Press Release and Public Statements

An employee should inform his immediate supervisor if a member of the media approaches him/her for any information, statement or opinion concerning the Company. The immediate supervisor shall direct the media to Corporate Communication Department.

An employee shall not make any public statement on the policies or decisions of the Company whether orally or in writing or in any form whatsoever nor shall he circulate or cause to be circulated any such statement.

E. Public Appearance as a Guest Speaker or Panel Member

Any employee who has been invited to appear as a guest speaker in a public forum must, if he intends to make such appearance, submit the details and/or the topic(s) of his proposed speech to his immediate supervisor. The immediate supervisor shall in turn submit the same to the management for their consideration. An employee may only make such appearance if prior approval has been obtained.

F. Publications

Employees are not permitted to publish or distribute in any written or printed form, articles, books, periodicals, leaflets, brochures etc. containing information relating to the Company without prior written approval of the Company.

G. Conflict Of Interest

An employee cannot during his employment with the Company, engage directly or indirectly in any other business or occupation whether as principal, agent, servant or broker while still in the employment of the Company. He is also not permitted to engage in any activity, which can be detrimental, directly or indirectly, to the interest of the Company.

An employee may acquire or hold shares in any quoted public company. However, he must seek prior approval from the Company if he intends to acquire substantial shareholdings(s) in any such company (as defined in the Companies Act, 1965) or hold directorship(s) in the same company.

An employee is not allowed to participate in or influence the purchase of goods & services and facilitation payment from any company or person in which or through which that employee has or will obtain a direct or indirect interest or benefit.

Upon receipt of the Code, all employees must declare all such interests as described in the Declaration Form for conflict of interests and particular attention must be paid to the notes thereto, which explain the types of interests that must be declared.

Any proposal made by any employee for an unsolicited offer to purchase any or all of the equity interests of any of the Companies in the Group will be viewed as an event that may give rise to a conflict of interest if such employee continues employment with the Group. Accordingly, such employee shall tender his resignation immediately.

H. Gifts or Favours

It is the policy of the company that no employee or any member of his immediate family will accept any form of gifts or favours from contractors, suppliers, clients/customers, or any other party having business dealings with the Company.

However, in such circumstances where it is customary to do so, employees shall be permitted to accept such gifts of nominal value or favours provided that such gifts or favours are not extended and / or accepted for the purpose or with the intention of:-

- a) Influencing any present or future act or decision by that employee.
- b) Inducing such employee to perform or omit any act in violation of his proper duties and responsibilities.
- c) Inducing such 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 gift giver with the Company.

For the purpose of this section, 'Nominal Value' of a gift shall be defined as the sum of the gift(s) having the aggregate monetary value of not more than Ringgit Two Hundred and Fifty only (RM250).

Employees shall report to their respective Head of Department all gifts or favours received which exceed the nominal value.

All employees shall, if in doubt as to the nature or purpose of the gift or favours consult the HR Manager who shall decide, either in consultation with or through his own accord, the course of action in respect of such gift or favor. Gifts that cannot be accepted by the employee shall be:-

- i. returned to the donor; or
- ii. If such return is not possible or impracticable, retained by the Company for

distribution to recognized charitable organizations, the Company's Sports and Recreational Club or for general distribution to the Company's employees.

I. Entertainment

Employees shall not accept any gratuitous entertainment from any of the Company's clients, customers, suppliers, contractors or any party with whom the Company has business dealings with unless such entertainment is or is able to be reciprocated by the employee:-

i. In his personal capacity; or

ii. By obtaining reimbursement from the Company as part of the Company's business entertainment expense.

In accepting all such entertainment, the guidelines set out in paragraph (H) in respect of acceptance of gifts or favor shall apply.

J. Personal Solicitation

The Company prohibits any solicitation by staff members during working hours as such solicitations normally disrupt business activity and work routines.

Employees are not permitted to sell, distribute or act as agent for the sale or distribution of any type of food or merchandise in the office premises whether during or outside office hours.

K. Graft and Invitation to Graft

An employee shall not in any manner or form offer on behalf of the Company or receive an offer of graft or a bribe for the Company benefit, his own benefit, or the benefit of his relatives or spouse.

L. Marriage and Transfer

In the event of a marriage between employees of the Company within the same department, one partner to the marriage may be relocated to another department.

M. Relatives

The Company discourages the hiring of the family members of an existing employee. The onus is on such employee to declare whether he has any relatives or spouse working in the Company or any Company within the Group.

15. SEXUAL HARASSMENT

It is the policy of the Company 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 sexual harassment.

Employees are strictly prohibited from engaging in any form of harassment, humiliation and intimidation of a sexual nature.

Definition of sexual harassment

For the purpose of this Code, sexual harassment is defined as (or as defined under Section 2, Employment Act 1955):

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.

Sexual harassment can occur between individuals of different sexes or of the same sex.

Based on the above definition, sexual harassment may be divided into two categories, namely sexual coercion and sexual annoyance.

Sexual coercion is sexual harassment that results in some 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 favors. If the subordinate accedes to the superior's sexual solicitation, job benefits will follow. Conversely, if the subordinate refuses, job benefits are denied.

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 the annoying conduct creates a bothersome working environment in which the recipient has to tolerate in order to continue working. Sexual harassment by an employee against a co-employee falls into this category. Similarly, harassment by a Company's client against an employee falls into this category.

Sexual harassment in the workplace includes 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) 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

It is essential to emphasize that sexual harassment refers to sexual conduct 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.

Forms of sexual harassment

Sexual harassment encompasses various conducts of a 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, inquiries or discussions about sexual activities or other 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;
- (v) Physical harassment e.g. inappropriate touching, patting, pinching, stroking, grabbing, hugging, kissing, fondling, brushing up against the body, coerced sexual intercourse or sexual assault.

Disciplinary Action

Since sexual harassment is a form of misconduct, all employees including supervisors and managers will be subjected to disciplinary action up to and including dismissal for engaging in sexual harassment. Employees who make false and malicious complaints of sexual harassment as opposed to complaints that are made in good faith will also be subject to disciplinary action.

An independent and thorough investigation in a manner that is as confidential as possible under the circumstances will be carried out on all complaints received alleging sexual harassment.

Complaint Procedure

Due to the sensitive and personal nature of sexual harassment complaints, the Company has developed a separate complaint procedure to deal specifically with such complaints.

Employees who believe themselves to be aggrieved under this policy are strongly encouraged to report complaints of sexual harassment as promptly as possible to the HR Manager. Delay in making a complaint of sexual harassment may make it more difficult for the Company to conduct an investigation.

16. DISCIPLINARY ACTION

Any employee who commits misconduct or a breach of rules established by the Company, shall be subjected to disciplinary action.

(i) Misconduct

Misconduct in employment can be broadly dealt with under three (3) headings namely:-

- a) Misconduct relating to duty such as carelessness, fraud, misappropriation, insubordination etc.;
- b) Misconduct relating to discipline such as fighting, assault, quarrel, gambling, damage to Company property, drug abuse etc.; and
- c) Misconduct relating to morality such as committing an indecent act, sexual advancement, pornography, keeping or distributing indecent or pornographic literature at the workplace etc.

(ii) Inquiries

A panel appointed at the discretion of the Company shall conduct all inquiries. The inquiry panel shall not include a member(s) whose presence may affect the impartiality of the panel in its conduct of the proceedings and its recommendations.

The proceedings of an inquiry shall be duly recorded by the panel for submission to the HR Manager or to the appropriate higher authority for decision.

The Company may suspend an employee on half pay for a period not exceeding two (2) weeks pending investigation and/or inquiry.

(iii) Action by the Company

All disciplinary actions taken by the Company shall comply with the Company's established procedures and current legislation. Where there is any conflict between the two, current legislation shall prevail.

Heads of Departments may issue written verbal warning on the advice of the HRD. All written verbal warnings shall be recorded in the employee personal file. In the event where three (3) written verbal warning for similar offence have been issued within a period of twelve (12) months, the employee shall be subject to an inquiry to determine further disciplinary action.

Depending on the gravity of the offence committed and after due inquiry, the employee may be subject to any of the following punishments:

No.	Punishment	Level
1	Discipline Ticket	Department
2	Written warning	IR Section
3	Dismissal without notice	IR Section
4	Downgrading	IR Section
5	Stoppage/Withholding of increment	IR Section
6	Withholding of bonus	IR Section
7	Withholding of promotion	IR Section
8	Any lesser punishment	IR Section

(iv) Summary Dismissal

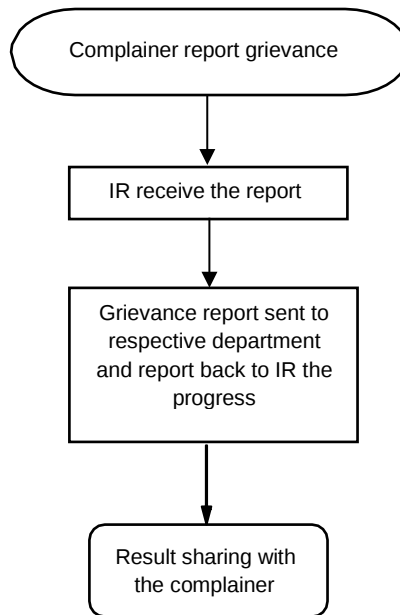
The Company reserves the right to dismiss an employee after due inquiry for misconduct including but not limited to dishonesty, insubordination, gross neglect of duty, bankruptcy and criminal conviction, within reasonable time after the misconduct in question without notice, salary or other forms of compensation. This right is in addition to and does prejudice its other rights under law.

(v) Right of Appeal

An employee who has been imposed a disciplinary action shall have the right to appeal in writing within thirty (30) days of the announcement of the decision to the following authorities:

<u>Category</u>	<u>Authority</u>
Management (G4-G8 grade)	Chief Executive Officer
Executives/Sr. Executives & Engineers /Asst. Manager (AE-G3 grade)	Chief Executive Officer
Non-Executives	Chief Executive Officer/Head of Company

(vi) Grievance Procedure



Employees should, whenever possible try to resolve disputes and minor problems amicably and informally between themselves or together with their immediate supervisors.

If such informal means do not bring a resolution, an employee may bring to the HR Manager's attention any grievance or complaint within fourteen (14) days from the date of occurrence of the event causing or giving rise to such grievance or complaint. Alternative method to report grievance is through e-grievance platform.

The filing of a formal grievance in writing or through e-grievance should be done only if such grievances or complaints cannot be resolved through these informal discussions.

A member of the Company shall be assigned by the HR Manager to attend to such grievances or complaints and to discuss and offer suggestions for resolution. Due consideration shall be given to all grievances and complaints and the Company shall make all efforts to resolve them promptly and fairly.

The HR Manager may at its discretion and depending on the seriousness of the grievances and complaints, bring the matter to the attention of the Head of Company/Chief Executive Officer for his consideration.

17. TERMINATION OF SERVICE

- i. Notice of termination of service shall be made in writing and in accordance with the Employee Terms and Conditions of Service.
- ii. In lieu of such notice, the employee or the Company shall pay a sum equivalent to the salary for the notice period required.
- iii. An employee shall surrender all Company documents, files, vehicles, keys and other Company property in his possession upon his termination of service in the Company.

- iv. The employee shall reimburse the Company the value of the replacement cost for any item(s) or the Company property that is lost or destroyed while under his custody.
- v. The employee shall settle all outstanding liabilities and obligations with the Company before any monies due to him are to be released.

18. WHISTLEBLOWER POLICY

This whistleblower Policy is commissioned in the purpose to promote a culture of honesty, ethical behavior and good corporate governance. It also to raise concerns in a responsible manner regarding any illegal conduct or malpractice without fear of retaliation where the identity of 'whistleblower' (informer), shall remain confidential.

For this purpose, a toll-free hotline telephone number, 1-800-88-2005 is secured by DRB-HICOM Group. Any complaints or reports on alleged wrongdoing or unethical business behavior, can be made through this toll-free number, and remain anonymous if the caller chooses to do so. The complaints and reports can also be conveyed through e-mail, fax or mail to Group Internal Audit Division.

19. HUMAN RIGHTS

- (i) The company prohibits all forms of child labour. However, the company may employ a young person under any Apprenticeship Programme permissible under Child and Young Person Act.
- (ii) The Company practice equal opportunity and no discrimination in any form to all employees.
- (iii) The Company does not practice human trafficking, including forced or indentured labor.

20. MINOR MISCONDUCT

Acts of minor misconduct include but are not confined to the following:

- 1. Late arrival to work.
- 2. Early leaving from work.
- 3. Causing minor damage to Company's property due to carelessness.
- 4. Failure to furnish information requested by the Company.
- 5. Unnecessary wastage of documents and material.
- 6. Failure to keep workplace clean and dirty.
- 7. Obstructing other associates from work.
- 8. Unpleasant and unsuitable personality.
- 9. Delaying duty with intention.
- 10. Bringing in outside food into company (production area).
- 11. Uniform offence.
- 12. Stop work before specified time without approval.

13. Attending to personal matters during working hours without prior to permission or approval from immediate supervisor.
14. Did not follow gazzetted break time.
15. Failure to record attendance.
16. Failure to display ID card in company premises.
17. Unauthorized personal solicitation.
18. Failure to be at work station during working hour and after break time.

21. MAJOR MISCONDUCT

Acts of major misconduct include but are not confined to the following:

1. Theft/Pilferage/Misappropriation or attempt of the same of the Company's money or property or other employees' money or property within the Company's premises.
2. Fraud, dishonesty, falsification or attempt of the same in connection with the Company's business, money or property.
3. Cheating the Company.
4. Fighting with or assaulting, abusing or being violent towards another employee or authorized visitor on the Company's premises or threatening the same.
5. Prosecuted or charged with criminal offence.
6. Soliciting or accepting bribes or any illegal gratification.
7. Participating in unauthorized financial transactions within the Company's premises.
8. Participation in illegal strikes.
9. Instigating industrial action among employees against the Company
10. Picketing in the Company's premises except where permissible under the law, agreement or award.
11. Inciting other employees to participate in illegal strikes in contravention of the provisions of any law or rule having the force of law.
12. Willful insubordination or disobedience whether alone or in combination with others to any lawful and reasonable order of a superior.
13. Conflict of interest.
14. Breach of fiduciary relationship.
15. Spreading malicious rumor's about the Company.
16. Gambling whether involving money or otherwise, in the Company's premises.
17. Gross negligence and neglect of duty.
18. Interfering with the record of his attendance or of any other employee or

- falsification, defacement or destruction of any record of the Company.
19. Sleeping while on duty.
 20. Possession of illegal weapon or lethal weapon on the Company's premises.
 21. Riotous, disorderly or indecent behavior on the Company's premises.
 22. Smoking in prohibited/restricted areas.
 23. Illegal substance or drug abuse.
 24. Disclosing confidential information.
 25. Driving or unauthorized use of the Company's vehicle without prior authorization
 26. All forms of harassment including but not confined to unwelcome verbal or physical advances and sexually, racially or otherwise derogatory or discriminatory statements or remarks.
 27. Habitual late coming or late attendance-
 28. Commission of any subversive act to the discipline of the Company or general behavior.
 29. Commission of any private act that brings disrepute, embarrassment or affects the legitimate interest of the Company or ruins the image of the Company.
 30. Habitual breach of any Company order or any law applicable to the establishment of rules made thereunder.
 31. Withholding overtime at a critical time to bring pressure on the management.
 32. Making material misstatement in job application, loan application or declaration.
 33. Unauthorized use of time cards.
 34. Possession, sale or distribution of unsuitable, indecent or pornographic materials.
 35. Committing an immoral act within the Company's premises.
 36. Failure to report serious infectious or contagious illness or diseases to the Company's medical Officer or HRD.
 37. Forging or defacing medical certificates or other official documents to defraud the Company.
 38. Conduct which is likely to cause injury or endanger the life or safety of another person within the Company's premises.
 39. Trespassing or forcible occupation of the Company's premises or prohibited areas.
 40. Illegally challenging Company to dismissal.
 41. Refusal to accept any communication served either in accordance with the Code of Conduct or in the interest of discipline.

42. Misrepresentation of the Company to others.
43. Participation in illegal gatherings or activities in the Company's premises or abetting, inciting or instigating the same.
44. Serious pecuniary indebtedness affecting the public image of the Company.
45. Making public statements against the interest of the Company.
46. Publishing or writing of books against the interest of the Company.
47. Leaving workplace during working hours without the permission of the immediate supervisor or overstaying sanctioned leave without sufficient grounds or proper satisfactory explanation or without informing or attempting to inform his employer of the excuse or reason for such absence.
48. Absenteeism.
49. Quarrelling or fighting or committing nuisance at the workplace.
50. Misdemeanors.
51. Carelessness or willfully causing damage or loss to the Company's property or goods.
52. Deliberate damage and interference with or contamination of factory processes, material or equipment.
53. Posting, altering, removing defacing or destroying the Company's notices or any material on bulletin boards or the Company's property without the permission of the management.
54. Failure to wear uniform at workplace as per the Company's policy.
55. Failure to furnish information which is within the scope of his employment and which relates to the mutual interest of the Company and employee.
56. Malingering and feigning illness.
57. Loitering during working hours.
58. Failure to follow safety procedures or tampering with safety devices to the detriment of the Company or its employees.
59. Infringement of safety regulations.
60. Unnecessary wastage of documents and materials.
61. Abuse or unauthorized use the Company's property, utilities, equipment or facilities.
62. Habitual or substantial negligence in the care of tools, equipment and apparatus of the Company.
63. Willful failure to report at once to his superior any defect which an employee may notice in any equipment connected with his work.
64. Willful in not reporting any defect or occurrence which an employee

may notice or which might endanger himself or any other person or which might result in damage to the Company or any person within the Company.

- 65. Failure to keep workplace clean and tidy.
- 66. Obstructing, inciting or willfully slowing down other employers from work.
- 67. Slackness in performance.
- 68. Disclosing commercial or manufacturing secrets, calculations or designs.
- 69. Park vehicle at non-designated area.
- 70. Bring out company property without permission.
- 71. Failed to provide information of supplier/customer/visitor for security screening.
- 72. Modified hardware and software or company assets without permission.
- 73. Possessing confidential data/information or company assets without permission
- 74. Illegal installation/utilization of software.
- 75. Bring in outsiders into company premises without prior approval from management.

The above examples of misconduct are not exhaustive as the Company reserves the right to determine what constitute acts of misconduct that warrant disciplinary action.

22. FREEDOM OF ASSOCIATION

The company acknowledges the employee rights to form and assist in the formation of and join a trade union and to participate in its lawful activities.

_____End_____