

## 1.1. Ethics

To meet social responsibilities and to achieve success in the marketplace, all parties shall uphold the highest standards of ethics including:

### 1.1.1. Business Integrity

- 1.1.1.1. The Company's owners, Investors, directors, officers and senior staff do not own or have a significant financial or other interest in businesses that might create conflicts with the Company's delivery of services as a Private Employment Agency or its ability to meet any principle of this Code.
- 1.1.1.2. The Company's commits to highest standards of business integrity and zero tolerance on all forms of bribery, corruption, collusion, extortion and embezzlement in all of business operation.
- 1.1.1.3. All business dealings should be transparently performed and accurately reflected on business books and records.
- 1.1.1.4. Monitoring and enforcement procedures shall be implemented to ensure compliance with local anti-corruption laws.
- 1.1.1.5. The Company's prohibits conflicts of interest and prohibits requiring jobseekers or workers to purchase goods or services from companies or businesses recommended by the Company or that are owned in whole or in part by the Company, its owners, Investors, directors, or senior staff.
- 1.1.1.6. Personnel file leave records and disclosure records confirm no negative consequence for any staff member who refused to violate the policy or who declared a conflict of interest.
- 1.1.1.7. The Company's owners, Investors, directors, officers and senior staff do not own or have a significant financial or other interest in businesses that might create conflicts of interest, such as:
  - a) Companies providing food, lodging, transportation and related service to jobseekers and workers,
  - b) Agent and sub- agents used by the Agency
- 1.1.1.8. Communication and training for Management and staff shall be in place.

### 1.1.2. No Improper Advantages

- 1.1.2.1. Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted.
- 1.1.2.2. Prohibited any kind of promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through at third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.
- 1.1.2.3. Gifts to of from agents, sub-agents, employers or other with which the Company has a business relationship are not excessive in cost and frequency
- 1.1.2.4. Gift in cash or in kind from jobseekers and workers are not accepted.

- 1.1.2.5. Gift can be provided or received with the term:
- Gift shall not exceeding RM 100;
  - Souvenir or Festival Gift; and
  - Shall not exceed more than 2 times a years
- 1.1.2.6. Bribes or other methods of obtaining improper advantage with government officials, government workers, clients and others are not promised offered, authorized, given or accepted.
- 1.1.2.7. The Company regularly monitoring its business activities and those of the Agents and sub-agents it uses to ensure its staff do not make or accept improper offer, bribes or otherwise seek improper advantage
- 1.1.2.8. Investigation of allegations of improper business conduct by Company staff of its Agents and Sub-agents are perform and all necessary corrective and preventive actions are taken in a timely manner.
- 1.1.2.9. Records of allegations of unethical behavior and the resulting investigations are available and describe how the investigation was performed, objective evidence and actions taken for confirmed policy violations.
- 1.1.2.10. Declaration of conflict of interest are recorded.
- 1.1.2.11. Initial and annual refresher training on the procedures to avoid improper Advantage is delivered to all Management and staff.
- 1.1.2.12. All training record and material must keep.

1.1.3. Disclosure of Information

- 1.1.3.1. Our dealings should be transparently performed and accurately reflected on business books and records.
- 1.1.3.2. Information regarding participant labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices.
- 1.1.3.3. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable

1.1.4. Intellectual Property

- 1.1.4.1. Intellectual property protection comprises of patents, trademarks, industrial designs, copyright, geographical indications and layout designs of integrated circuits.
- 1.1.4.2. Intellectual property right, transfer of technology and customer information shall be safeguarded and protected.

1.1.5. Fair Business, Advertising and Competition

- 1.1.5.1. The Company does not engage in or encourage false advertising regarding any aspect of Its services, either to employers or to the

workers that it recruits and hires for temporary placement or permanent work.

1.1.6. Protection of Identity and Non-Retaliation

1.1.6.1. Program that ensures the confidentiality, anonymity and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law.

1.1.6.2. Communication process shall be in place to ensure any personnel able to raise any concerns without fear of retaliation.

1.1.7. Privacy

1.1.7.1. The Company respects the right of its employees, as well as jobseekers and placed workers, to not disclose information that is protected by law, and does not disclose information that may disadvantage a worker's employment or future employment.

1.1.7.2. Everyone that has business relationship including suppliers, customers, consumers and employee personal information or privacy shall be reasonable protected.

1.1.7.3. Local privacy and information security law and regulatory requirements for personal information collect, store, process, transmitted and share shall adhere.

1.1.8. Disclosure of Information

1.1.8.1. Information regarding participant labor, health and safety, environmental practices , business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices.

1.1.8.2. Falsification of records or misrepresentations of conditions or practices in the supply chain are unacceptable and shall not practice.

1.1.8.3. Prohibited to disclose information to any third party without acknowledge and verify by the Management.