



CODE OF BUSINESS CONDUCT

February 2020
Version 1.0

HeiTech Padu Berhad

Company No.: 310628-D

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TABLE OF CONTENT

	Page Number
HEITECH VISION, MISSION AND CORE VALUES	1
1 BASIC PRINCIPLE	4
2 OBJECTIVE	4
3 SCOPE	4
4 RESPONSIBILITY AND ACCOUNTABILITY	5
5 PUNCTUALITY & ABSENCE WITH PERMISSION	6
6 CONFLICT OF INTEREST	6
7 CORRUPT PRACTICES ARE STRICTLY PROHIBITED	8
8 HEITECH ANTI-BRIBERY AND CORRUPTION POLICY, HEITECH WHISTLE BLOWING POLICY AND GUIDANCE ON GIFTING	8
9 ACCEPTANCE AND PROVISION OF GIFTS AND ENTERTAINMENT	8
10 SOLICITATION OF SPONSORSHIP FOR PERSONAL GAIN	9
11 FRAUD	9
12 COMPLY WITH LAW AND REGULATIONS	9
13 WORKING RELATIONSHIP	9
14 PROTECT HEITECH'S ASSETS AND REPUTATION	10
15 SOCIAL MEDIA ETIQUETTE	13

16	REPORTING OF VIOLATIONS OF THE CODE	14
17	REVIEWS AND AMENDMENTS	14

APPENDIX - A Quality System Document Amendment Register

HeiTech Vision, Mission and Core Values

HeiTech Vision:

"The trusted technology partner to enable customers' vision"

HeiTech Vision directs the company to be recognised as a trusted technology partners for our customers to enrich their customers' experience and to realize their visions.

HeiTech Mission:

"Touching lives with innovative solutions"

- i. As a trusted partner, HeiTech delivers solutions to customer via leading technologies and services
- ii. Innovative solution means:
 - Products and solutions which are developed using or via latest technology to suit customers' requirements and expectations and give high value to the company.
 - Customized solutions to enhance customers' operational efficiency and their customers' experience.
 - Provide innovative solutions which include;
 - Multiple delivery channel through mobile devices
 - Digitalisation
 - Easing people's life
 - Customer experience
 - Cost optimization.

HeiTech Core Values

Core values are important as they define HeiTech's culture. Core values are a bridge between leadership's vision and the behaviours that support the vision. In realising HeiTech's Vision and Mission, we have to embrace HeiTech Core Values where Integrity is the fundamental, supported by Dynamism, Passion for Excellence and People Centric.

The Table below indicates further description of the four (4) HeiTech Core Values:

1. INTEGRITY:

1	Accountability	Accountable for own action, behaviour and conduct
		Take ownership of decisions and actions
2	Trustworthy	Honest and truthful
		Reliable in delivering quality results
3	Fairness	Impartial and objective in making decisions
		Free of self-interests, prejudice and favouritism

2. DYNAMISM

1	Stay ahead	Intuitive to future business and technologies
		Consistently relevant and in the forefront of knowledge and technologies
		Creative and innovative in offering solutions to clients
2	Professionalism	Highly competent by acquiring new skills and knowledge and translate them into actions
		Proactive and tactful in solving problems and become a solution oriented personnel
		Embrace the "walk-the-talk" philosophy
3	Versatility	Adaptable to new business functions and needs
		Well-adjusted to new business demands and conditions
		Persistent in solving problems despite their difficulties

3. PASSION FOR EXCELLENCE

1	Service beyond expectation	Provide quality services and superior customer service experience
		Strive for service delivery excellence
2	Role Model	Highly motivated and inspirational
		Exemplary attitudes and behaviours
		Foster new changes and positive transformation
3	Responsiveness	Quick in reacting to clients' demands and requirements
		Complete task within the given timeframe
		Proactive in responding to business needs

4. PEOPLE CENTRIC

1	Customer Centric	Driven to enhance customers' experience
		Driven for continuous improvement
		Intuitive to customer's needs and delight them with innovative products and services
2	Developing talent	Reinforce learning values by keeping abreast with new development and technologies
		Help others to develop and achieve their potentials
		Uphold organization core values into everyday tasks
3	Respect	Understand and appreciate the uniqueness of individuals
		Able to work in a team
		Adaptable and sensitive to emotions of others

1. BASIC PRINCIPLE

All employees of HeiTech Padu Berhad should comply strictly to the laws and regulations of Malaysia as well as to accept standard of business ethics, both locally and overseas including those set out in this code.

HeiTech or Company means HeiTech Group of Companies.

2. OBJECTIVE

2.1 The objective of HeiTech Code of Business Conduct is to provide guidance on the standards of behaviour expected of all employees of HeiTech, including HeiTech's business partners, contractors, vendors and other HeiTech's counterpart (where applicable). The standards of behaviour are derived from HeiTech's Four Core Values i.e.:

- (i) Integrity
- (ii) Dynamism
- (iii) Passion for Excellence
- (iv) People Centric

2.2 This code is intended to cultivate a positive work attitude and professional behaviour expected of employees in performing duties and responsibilities in line with HeiTech's Core Values.

2.3 This Code of Business Conduct provides a guideline that highlights key issues and the relevant policies and procedures to help employees conduct business in line to HeiTech's standards. It may not cover every ethical situation that employees would encounter during their performing duties. It will be reviewed and amended when necessary, to ensure it is relevant and appropriate.

3. SCOPE

3.1 HeiTech Code of Business Conduct shall be applicable to all employees (including probationary, contract and temporary employees) of the Group.

3.2 The Company expects that all employees to know and follow this Code of Business Conduct. Each employee has a duty to read and understand the Code. Violation of any of the Code's provisions can result in disciplinary action, including termination of employment.

- 3.3 The code shall also be applicable to all third parties who are assigned to work and provide services to the Company. It is expected that all HeiTech's counterparts which include business partners, contractors, consultants and others who may be temporarily engaged to perform work or services for HeiTech to follow the Code in connection with their scope of services for HeiTech.
- 3.4 Failure of HeiTech contractor, consultant or other service provider to follow the Code of Business Conduct can result in the termination of their relationship with HeiTech.
- 3.5 Employees are to seek clarification from the Human Resource Department in matters related to this policy.

4. RESPONSIBILITY AND ACCOUNTABILITY

4.1 Employees

Employees shall comply with the Code whereby ignorance of the existence of the Code which includes its amendments or updates is not accepted as an excuse for its breach.

Employees shall be notified via HR Circular email in the event that there is an update and/ or amendment to the Code.

4.2 Managers and Supervisors

4.2.1 Managers and supervisors are responsible to guide their subordinates and must lead by example in understanding and practising the code of conduct in performing of their duties and responsibilities with the Company.

4.2.2 Managers and supervisors are responsible to act as the first point of contact for their subordinates to seek necessary clarifications if there is any ambiguity with regards to the code and its implementation. In the event that, managers and supervisors are uncertain and not able to provide answer to the clarification, the managers and supervisor should seek clarification from Human Resource Department.

4.2.3 Managers and supervisors should diligently be on the lookout for indications that unethical or illegal business conduct has occurred.

4.3 Customers, Vendors, Suppliers and Contractors

- 4.3.1 It is the duty of employees to ensure that all customers, suppliers, vendors, contractors and their respective contractors of the Company to conform to the principles outlined in this document in their business relationship and dealings with HeiTech.
- 4.3.2 In the event where employees encounter issues on observing such principles, employees must first work with them to resolve such difficulties or issues. If they fail, the Company will engage parties who can observe such principles diligently and meet the standards as outlined in the code.
- 4.3.3 Any employees who have concerns about unethical conduct or business practices taking place in the Company, employees are expected to take appropriate action by informing their managers/ supervisors or report the concern or violation based on HeiTech Whistle Blower Policy or inform the Governance and Integrity Department.

5. PUNCTUALITY & ABSENCE WITH PERMISSION

- 5.1 In line with HeiTech Core Values, punctuality reflects professionalism and respect. Therefore, employees must be punctual in attending meetings, conference, training and appointment, both for internal and external.
- 5.2 In the event that an employee needs to leave the workplace to attend to urgent personal matters during working hours, the employee needs to obtain prior approval from his/her supervisor.

6. CONFLICT OF INTEREST

- 6.1 Employees are expected to use their judgement to act, at all times and in all ways, in the best interests of the Company when performing their job duties. Employees must refrain from engaging in any activity or having a personal interest that presents a conflict of interest.
- 6.2 It is the responsibility of the employee to disclose any possible transactions or relationship that may give rise to a conflict of interest.
- 6.3 Employees must not use their positions or knowledge gained directly or indirectly in the course of their duties or employment for private or personal advantage (directly or indirectly).

- 6.4 Employees involved in the procurement process should declare a conflict of interest if they have a beneficial interest in any company which is being considered for selection as the Company supplier of services or goods.

As a guide, below are areas where conflict of interest often arises:

6.4.1 Personal Investments

Avoid making personal investments in companies that are HeiTech competitors or business partners where the investment might cause or appear to cause employees to act in a way that could harm HeiTech.

6.4.2 Other Employment/ Disclosure of Business Interest

- (i) Employees are expected to devote the whole of their time and attention to HeiTech Padu Berhad and its Group of Companies as per responsibilities, duties and tasks assigned to them. Employees are prohibited to take up other employment while serving HeiTech. Any employees who are found working with other employment will be subject to violation of this code of conduct which can result in disciplinary action, including termination of employment.
- (ii) Employees are not allowed to conduct their own personal business during working hours.
- (iii) An employee should declare any other directorship outside HeiTech Padu and the Group to Human Resource Department.

6.4.3 Business Opportunities Found Through Work

Any business opportunities discovered by employees through their work or while they are performing their duties in HeiTech, the business opportunities are deemed to belong to HeiTech Padu and the Group except as otherwise agreed by HeiTech Padu and the Group.

6.4.4 Inventions

- (i) The intellectual property right and/ or the ownership of any invention of new solutions, product and services developed by employees in performing their duties belong to HeiTech.
- (ii) Employees involvement in any invention of new solutions, products and services under the following circumstances may create a conflict of interest and it may be subject to violation of this code of conduct which can result

in disciplinary action, including termination of employment, unless it is approved by HeiTech:

- (a) Developing or helping to develop outside inventions that relate to HeiTech's existing or reasonably anticipated products and services or related to the employees' positions in HeiTech OR
- (b) Developing or helping to develop outside inventions using HeiTech's resources.

6.4.5 Doing Business with Others

- (i) Employees must ensure that business decisions and actions must be based on the best interests of HeiTech Padu and the Group and it must be motivated by personal considerations or relationships. Relationship with a prospect or existing suppliers, contractors, customers, competitors or regulators must not affect employees' independent and sound judgement on behalf of HeiTech Padu and the Group.
- (ii) Any outside activity must be strictly separated from HeiTech Padu and the Group and should not affect job performance of the business of HeiTech.

7. CORRUPT PRACTICES ARE STRICTLY PROHIBITED

Corrupt practices are operationally defined as a misuse of entrusted power for private and/or personal benefit. Employees must comply strictly to all provisions of the Malaysian Anti-Corruption Commission Act (MACC) 2009 and all gazetted Amendments.

8. HEITECH ANTI-BRIBERY AND CORRUPTION POLICY, HEITECH WHISTLE BLOWING POLICY AND GUIDANCE ON GIFTS, MEAL, ENTERTAINMENT AND HOSPITALITY

This Code of Business Conduct must be read together with Anti-Bribery and Corruption Policy, HeiTech Whistle Blowing Policy and Guidance on Gifts, Meals, Entertainment and Hospitality.

9. ACCEPTANCE AND PROVISION OF GIFTS AND ENTERTAINMENT

All employees must comply with HeiTech Anti-Bribery and Corruption Policy and Guidance on Gift, Meals, Entertainment and Hospitality.

10. SOLICITATION OF SPONSORSHIP FOR PERSONAL GAIN

HeiTech prohibits its employees, whether directly or indirectly, from soliciting, accepting or agreeing to accept any form of sponsorship or gifts or hospitality from any parties for personal benefit.

11. FRAUD

Employees must not engage in any forms of fraudulent acts or any dishonest conducts involving property or assets, or on the financial reporting and accounting of HeiTech or third party. This may not only entail sanctions but also result in criminal charges.

12. COMPLY WITH LAW AND REGULATIONS

Each of employee is responsible for taking appropriate actions to understand and comply with the laws, rules and regulations that are applicable to their positions and/or work.

13. WORKING RELATIONSHIP**13.1 Health & Safety**

The Company strives to provide a safe, secure and conducive work environment. Every employee must diligently observe and comply with all Occupational Safety and Health laws and regulations of any country and the Group's environmental safety rules and regulations.

13.2 Sexual Harassment & Violence

HeiTech will not tolerate or condone any form of harassment and violence. Any employee who believes that he/ she has been subjected to harassment can lodge a report to Human Resource Department who will be responsible to review the case and consider the appropriate course of action where applicable. Please refer to HeiTech Sexual Harassment Policy for further guidelines.

13.3 Respect, Equal and Non-Discrimination

Each of the employees will be treated with respect and dignity. The Company endeavours to provide equal opportunity to ensure that employment decisions are based on merits and performance without regard to race, religion, gender,

age, nationality or disability, and shall not create any form of discrimination or prejudice in the workplace.

Employees shall conduct themselves in a professional manner and in the best interest of the Company, avoid any language or behaviour that intimidates or offends others in any dealings, listening to other individual ideas and opinions and also recognising each individual's contribution to the Company.

14. PROTECT HEITECH'S ASSETS AND REPUTATION

14.1 Protect HeiTech's Information & Assets

The Company values and protects all proprietary and confidential information and is committed to protecting its assets and resources.

Employees are expected to exercise reasonable care to safeguard the Company's assets to avoid any loss, damage, misuse or theft. Employees must safeguard proprietary, confidential information, plus personally identifiable information at all time to prevent harm to HeiTech, our shareholders, and individuals or other third parties that have trusted us with their information.

14.2 Access to the Internet and its Materials

Access to the internet is provided to all employees at the work place. However, the usage should be strictly for business purposes which include any research work related to employee's work requirements. The Company reserves the right to revoke the internet access of the employee if they are found to abuse the facilities provided.

14.3 Software Piracy Policy

Employees are bound by HeiTech Software Policy and Procedure. Employees must ensure that all software installed and used in employees' notebooks and computers are legal and provided with valid software licensed as per the requirement of HeiTech Software Policy and Procedure.

Any employee found using or installing any illegal software or any violation of HeiTech Software Piracy Policy are subject to disciplinary actions which may include termination of employment.

Any further reference on the matter related to HeiTech Software Piracy Policy, please refer to HeiTech Information Technology Policies.

14.4. Confidential Information

All employees are legally bonded to the Confidentiality Agreement / Non-Disclosure Agreement signed with the Company and its customers (if required by customer).

All employees must exercise caution and due care to safeguard any information of a confidential and sensitive nature relating to the Company and its customers which is acquired in the course of their employment, and are strictly prohibited from disclose to any party, unless the disclosure is duly authorized or legally mandated in compliance with the Personal Data Protection Act 2010.

In the event that an employee know of material information affecting the Company and its customers which has not yet been publicly released, the material information must be held in the strictest confidence by the employee involved until it is publicly released.

14.5. Records Management & Control

All books, records and accounts must be controlled and maintained so that they are prepared on timely basis and conform to generally accepted and applicable accounting principles and to all applicable laws and regulations.

Ensure financial and non-financial integrity & controllership

(i) Maintain books & records

Employees are responsible for ensuring that HeiTech books and records are recorded accurately fairly and reasonably reflect the substance of transactions.

Purposely misrepresenting information or activities on company documents and reports may be considered falsification of documentation, which is a serious offence. The Company reserves the right to report any act of misrepresentation suspected of being criminal in nature to the police or other relevant authorities.

(ii) Comply with internal controls & procedures

Employees are responsible to maintain and adhere to all Company's policies and procedures to ensure critical risks are managed to the best of ability and that financial and operational information reflects all business transactions accurately, timely and unbiased, financial forecasts and assessments are genuine and assets are safeguarded.

(iii) Commitment by resignees and consultants disallowed

An employee who has tendered notice of a resignation or opted for early retirement or about to reach a mandatory retirement and is serving the notice period or contract employee who is within three months of the end of his/her contract are not allowed to make any commitments on behalf of the Company.

Consultants or any third party engaged under contract for service are not allowed to make or approve any commitment on behalf of the Company.

14.6 Safeguarding HeiTech and the Group's Reputation

(i) Establishing business relationship

Employees must ensure that the process of arrangements and engagement with any third parties comply with HeiTech's policy and procedure and applicable law.

(ii) Avoiding any attempts to obtain favourable treatments/ terms

Employees are prohibited to attempt or commit to making payment to third parties to secure sales or obtain favourable terms or treatment. Gifts of substantial value or extravagant entertainment which is non-compliance with HeiTech Anti-Bribery and Corruption Policy and Guidance on Gifts, Meals, Entertainment and Hospitality are prohibited.

(iii) Dealing with Government Agency & Business Associate

Employees whose duties require dealing with Government Agency and Business Associate and Third Parties must always comply with HeiTech Anti-Bribery and Corruption Policy.

(iv) Responsibilities to other parties

Political Parties and Non-Government Organisation

The employees engaging in politically, socially or professional body-related activities will do so in their personal capacity as a private citizen and not as a representative of HeiTech Group. The employees shall ensure that their activities do not interfere with the efficient and due discharge of their duties to HeiTech and the Group of Companies. Employees shall also ensure that HeiTech and the Group is not

perceived as supporting the employees' activities. If such activities encroach into the actual work and working hours that should be devoted to HeiTech and the Group, prior written approval from HeiTech and the Group must be obtained.

The employees who wish to stand for State and/or Federal election are required to resign from the Company.

15. SOCIAL MEDIA ETIQUETTE

- 15.1 Employees are prohibited to publish postings and/ or make comments to others' postings with contents that can be viewed as bias, discriminating, abusive, threatening, derogatory, demeaning, harassing, humiliating, and malicious and belittling others.
- 15.2 Employees' posting in social media shall at all time adhere to the terms stated in the Confidential Agreement and Non-Disclosure Agreement.
- 15.3 Employees are to observe professional etiquette and adhere to the general guidelines below when participating in on-line discussions and/ or posting their opinions and comment in social media;
- (i) Employees speak for themselves, not the company

Unless it's part of an employee's job to be a company spokesperson, any company- related on-line posts should include a statement such as "these are my views, not my company's views."
 - (ii) Do not comment on confidential matters

Employees should follow existing corporate policies for issues such as protecting information that is company's or customers' confidential.
 - (iii) If you are not clear or unsure, do not post on-line

Employees need to ask for clarification from their superiors or colleagues on topics pertaining to company matters before posting them on-line.
 - (iv) Provide links to information on the company Web site

When a customer poses a question about a product or service that you know is answered on our corporate Web site, respond by providing a link to the relevant information
 - (v) Do not discuss about competitors

When you read a good review of a competitor's product or service, it can be tempting to comment with your thoughts on why the competitors offering is inferior to ours. But insulting competitors does not put the company in a better light. It is ethical NOT to comment on-line about any aspect of the competitor's business. This is also applicable to our Customers.

(vi) Be polite

No matter how much you may disagree with someone else's blog or social media post, do not insult them with obscene or rude language. State your opinions in a respectful manner.

(vii) Be transparent

To avoid appearing in secret or unknown messages when posting a work-related remark, include your real name and your job title in all of your posts.

(viii) Report any negative comments about the company that you see on-line.

This will help our customer relationship officer getting in touch with unhappy customers or entities and attempt to resolve their concerns.

16. REPORTING OF VIOLATIONS OF THE CODE

- 16.1 Employees are expected to seek advice if they are unsure of an appropriate legal or ethical course of action.
- 16.2 Employees are encouraged to report concerns of violation of the Code of Business Conduct based on HeiTech Whistle Blowing Policy. No individual will be discriminated or suffer any act of retaliation for reporting in good faith.

17. REVIEWS AND AMENDMENTS

- 17.1 The provision of this policy and procedures are subject to reviews and amendments from time to time to ensure that the terms and conditions remain relevant to the changing factors.
- 17.2 The Company reserves the right to add, edit, amend, delete, omit or cancel any part of the content or the entire content of this policy without giving any reason for such actions
- 17.3 The Company reserves the right to review and amend this Code of Business Conduct to ensure it remains relevant and appropriate.

APPENDIX A – QUALITY SYSTEM DOCUMENT AMENDMENT REGISTER

No.	Date	Reason	Chapter	Version	Initials
1	February 2020	New	All	1.0	WM