



**MEGA SQUARE SDN. BHD.**

**BUSINESS CODE OF CONDUCT**

MSSB-001 REV.02.202306

## OVERVIEW

Mega Square Sdn. Bhd.'s Business Code of Conduct (the "Code") is developed to provide you information regarding the standards of business conducts which are critical for each and every one of us to comply and the general guidelines policies and procedures affecting your employment. This Code is subject to modification, amendment or revocation by Mega Square Sdn. Bhd. at any time and without prior notice.

None of the policies or guidelines in this Code is intended to give rise to contractual rights, or to be construed as a guarantee of employment for any specific period of time, or any specific type of work. This Code complements your employment contract or the relevant contract for services and in case of discrepancy, the provisions of your employment contract (or the contract for services) shall take precedence.

### What Mega Square Sdn. Bhd. expects from you

- This Code is applicable to all employees of Mega Square Sdn. Bhd. You are expected to read, understand and comply with all provisions stipulated in this Code and display good judgment, diplomacy and courtesy in your professional relationships with members of Mega Square Sdn. Bhd.'s Board of Directors, Managers, Executives, Customers, Suppliers, Vendors, staff, and the general public.
- Reference to "we" or "you" or "employee" in this Code includes directors, officers and employees of Mega Square Sdn. Bhd., where the context applies to your role as an employee and/or as a line manager (i.e. leaders, supervisors, head of departments, directors).
- If you are a contractor, intern, agent, supplier or consultant working with Mega Square Sdn. Bhd., we ask that you act consistently with this Code and apply similar standards at the course of your work or service provision to Mega Square Sdn. Bhd., where applicable.
- You have a duty to report any suspected wrongdoing in breach of the Standards of business conducts and/or this Code. You will not suffer any form of reprisal or retaliation for reporting any actual or suspected wrongdoing, Disciplinary action will be taken for conduct that breaches the Standards of business conducts or this Code or is illegal.
- If you have any queries related to this Code or you are not sure how to apply the provisions stipulated in this Code, you are encouraged to consult the Personnel & Administration Manager as higher management, where applicable.

## A. REPORTING PROCEDURE

Anyone working for or with Mega Square Sdn. Bhd. who is concerned about actual or suspected wrongdoing at work should report the wrongdoing. Examples of wrongdoing include:

- criminal acts, including theft, fraud, bribery and corruption
- endangering the health or safety of an individual or damaging the environment
- bullying, harassment (including sexual harassment) and discrimination in the workplace, or other human rights abuses
- accounting malpractice or falsifying documents
- other breaches of the Standards of Business Conducts or this Code
- failing to comply with any legal obligation, by act or omission
- concealing any wrongdoing
- Fighting, arguing or attempting to injure another
- Destroying or willfully damaging the personal property of another or Mega Square Sdn. Bhd.
- Breach of confidentiality
- Misuse or misappropriation of any confidential information obtained on the job for personal gain
- Gambling in any form within working hours and/or on the Mega Square Sdn. Bhd. premises
- Dishonesty
- The possession, use, sale or being under the influence of drugs or other controlled substances or alcoholic beverages during working hours or on the Mega Square Sdn. Bhd. premises at any time

Employees may raise their concern about an actual or suspected wrongdoing to the relevant Supervisor, the Head of Department and/or the Personal & Administration Manager. The Supervisor and the Head of Department shall attend to every concern or complaint raised. The Employee may raise such concern via the Grievance Procedure as set out in Section C of this Code.

Cases of minor wrongdoing or unsatisfactory conduct are usually best dealt with informally. An informal discussion between the employee and his/her line manager is often all that is required to improve an employee's conduct or behaviour. In some cases additional training, coaching and advice may be what is needed.

If an informal approach does not bring about an improvement, or the wrongdoing or unsatisfactory conduct is considered too serious to be classed as minor, the line manager (i.e. the Supervisor and/or the Head of Department) shall raise the said concern or complaint to the Personal & Administration Manager, or higher management, where appropriate. The Personal & Administration Manager or higher management shall assess the concern or complaint raised and adopt the Disciplinary Procedure as set out in Section C below, where appropriate.

The identity of the employee who reported the wrongdoing will be kept confidential as we fairly and objectively investigate the wrongdoing. Employee will not suffer any form of reprisal or retaliation for reporting the actual or suspected wrongdoing. Any such reprisal or retaliation is itself a breach of this Code and will be treated as a disciplinary matter in accordance with the Disciplinary Procedure as set out in Section C below.

## **B. STANDARDS OF BUSINESS CONDUCTS**

### **I. NO EXPLOITATION OF LABOUR**

We are committed to ensuring our operations are free from slavery and forced, bonded, involuntary, or unlawful migrant labour. We will ensure that the employment agencies or the relevant third parties acting on behalf of Mega Square Sdn. Bhd. will not require workers to pay recruitment fees or other related fees for their employment. Also, all migrant workers shall have the access to their identification documents (e.g. passport) at all times and the workers are not prevented from free association. The recruitment of foreign worker is subject to Mega Square's Foreign Worker Recruitment and Employment Policy

Employees are free to decline overtime work or terminate their employment in accordance with their employment contract and shall not face any discrimination or penalties for exercising this right. Employees are free to leave the workplace at the end of the working shift, free to move around the workplace, such as going to the washroom or taking water breaks, without any undue restrictions.

All employees are expected to cooperate fully in implementing and complying with this policy. In particular, any employee who believes that any other employee of Mega Square Sdn. Bhd. may have violated this policy should report the possible violation to the Supervisor, the Head of Department, or the Personnel & Administration Manager, where appropriate.

### **II. NO CHILD LABOUR**

We are committed to ensure our operations are free from child labour. As such:

- the minimum age for work should not be below the legal age for finishing compulsory schooling and, in any case, not less than the age of 18;
- where applicable, any apprenticeship program or temporary contract employment involving young person shall not be used to avoid paying full wages or benefits..

Any employee who believes that any other employee of Mega Square Sdn. Bhd. may have violated this policy shall report the possible violation to the Supervisor, the Head of Department, or the Personnel & Administration Manager, where appropriate.

### **III. EQUAL EMPLOYMENT OPPORTUNITY**

We are dedicated to providing equal opportunities to all our employees and to creating an inclusive workforce by promoting equal remuneration for work of equal value and employment equality. We shall not allow race, color, religion, national origin, sex, age, marital status, disability, political affiliation, or any other characteristic protected by law to influence our judgment when it comes to the recruitment, development, advancement, disciplinary actions, salary administration or retirement of any employee. The general recruitment principles are set out in Mega Square's Hiring Policy.

All employees are expected to cooperate fully in implementing and complying with this policy. In particular, any employee who believes that any other employee of Mega Square Sdn. Bhd. may have violated this policy shall report the possible violation to the Supervisor, the Head of Department, or the Personnel & Administration Manager, where appropriate.

#### IV. POLICY AGAINST WORKPLACE HARASSMENT AND BULLYING

All aspects of bullying and harassment are completely unacceptable. We are committed to removing any such attitudes or actions from the workplace. Harassment and bullying includes, but is not limited to, any form of sexual, verbal, non-verbal and physical behavior (whether express or implied) which is intimidating, humiliating, offensive, hostile or abusive; or has the purpose or effect of unreasonably interfering adversely with an individual's work performance or equal employment opportunities.

This policy applies to all work-related settings and activities, whether inside or outside the workplace, and includes business trips and business-related social events. All employees are expected to cooperate fully in implementing and complying with this policy. If we witness or experience such behavior, we shall report it to the Supervisor, the Head of Department, or the Personnel & Administration Manager, where appropriate.

#### V. ANTI BRIBERY, CORRUPTION & WHISTLE BLOWING POLICY / CONFLICT MINERAL POLICY

Mega Square Sdn. Bhd. is committed to conducting its business in an ethical and honest manner, and is committed to implementing and enforcing policies that ensure bribery or corruption is prevented.

For further details, please refer to Mega Square Sdn. Bhd.'s Anti-Bribery Policy & Anti-Corruption Policy & Whistle-Blowing Policy. All employees are expected to cooperate fully in implementing and complying with this policy.

#### VI. RESPONSIBLE SOURCING OF MINERALS

Mega Square Sdn. Bhd is committed to sourcing materials and minerals (i.e. tin, tantalum, tungsten and gold) from companies that share our values around human rights, ethics and environmental responsibility. We expect all of our suppliers to comply with applicable legal standards and requirements. Please refer to Mega Square Sdn. Bhd.'s Conflict Minerals Policy Statement.

## VII. ENVIRONMENT, HEALTH AND SAFETY

We strive to provide a safe environment for the benefit of the health and safety of all employees and workers. Appropriate health and safety rules and procedures are in place and displayed at the relevant work area, office or entrance. Good environmental health and safety practices are a responsibility of all employees. You must:

- Following all health and safety rules and procedures and machinery or equipment operating instructions
- Reporting hazardous conditions to your supervisor or EHS officer or Personnel & Administration Manager
- Wearing or using prescribed protective equipment in accordance with the health and safety rules and procedures
- Reporting any job-related injury / Covid-19 related symptoms or illness of yourself, your co-workers or others to your supervisor or Personnel & Administration Manager and seeking treatment promptly where appropriate.

All Heads of Department must enforce safety rules to their department and to give full support of all safety procedures, activities and programs. The relevant Supervisor or the Head of Department must report to the EHS officer or Personnel & Administration Manager of any health and safety incidents and/or irregularities and adopt the relevant emergency management procedures as appropriate.

For further details, please refer to Mega Square's Safety and Health Policy and Environment policy.

## VIII. NON-DISCLOSURE OF CONFIDENTIAL INFORMATION AND DATA PRIVACY

Any information (including personal data\*) that an employee learns about Mega Square Sdn. Bhd., or its subsidiaries, its suppliers or customers or any relevant third parties as a result of working for Mega Square Sdn. Bhd. that is not otherwise publicly available constitutes confidential information. All employees must ensure that they handle personal data in accordance with local data protection laws. Employees shall not disclose confidential information to anyone who is not employed by Mega Square Sdn. Bhd. and to other persons or third parties engaged or contracted by Mega Square Sdn. Bhd. who do not need to know such information to assist in rendering services or perform tasks related to the internal operations of Mega Square Sdn. Bhd.

All employees shall cooperate fully in implementing and complying with this policy and the Privacy Policy. Any employee who discloses confidential Mega Square Sdn. Bhd. information will be subject to disciplinary action (including possible separation), even if he or she does not actually benefit from the disclosure of such information.

*\*Personal data is information that directly or indirectly identifies an individual.*

## IX. PROTECTION OF CORPORATE ASSETS, INTELLECTUAL PROPERTY AND OTHER PROPERTIES

We must ensure the assets and properties are not damaged, misused, misappropriated or wasted and must report their abuse, theft or misappropriation by others. We are all responsible for safeguarding and making appropriate use of the assets and properties in accordance with the relevant instructions and permitted scope. Assets and properties include funds (cash, money advanced to any employee, company credit cards held by employee and etc.), physical and intellectual property, time, proprietary information, corporate opportunity, equipment, machinery, vehicles and facilities.

We must protect all intellectual property owned by or licensed to Mega Square Sdn. Bhd. For assets of third party, we must never knowingly infringe valid patents, trade marks, copy rights or other intellectual property in violation of third parties rights or perform unauthorized activities which adversely impact the relevant third party.

### **RETURN OF PROPERTY**

Employees are responsible for **Mega Square Sdn. Bhd.** equipment, property and work products that may be issued to them and/or are in their possession or control, including but not limited to:

- Telephone/mobile SIM cards,
- Credit cards,
- Identification badges,
- Office/building/personal storage/lockers keys,
- Office/building security passes,
- Computers/laptop, computerized portable storage, and
- Intellectual property (e.g., written materials, work products).

In the event of resignation, dismissal or termination of employment, or immediately upon request by the Personnel & Administration Manager or his or her designee, employees must return all Mega Square Sdn. Bhd.'s equipment, property and work product that are in their possession or control. Where permitted by applicable law(s), Mega Square Sdn. Bhd. may withhold from the employee's final paycheck the cost of any property which is not returned when required. Mega Square Sdn. Bhd. also may take any action deemed appropriate to recover or protect any such property.

## C. DISCIPLINARY AND GRIEVANCE PROCEDURE

### I. DISCIPLINARY PROCEDURE

#### 1. ***Purpose and scope***

Mega Square Sdn. Bhd.'s aim is to encourage improvement in individual conduct or code of practice. The disciplinary procedure sets out the action which will be taken when an employee is alleged with suspected or actual wrongdoings in which the informal approach as stipulated in Section A does not improve the said employee's conduct or practices. Disciplinary procedure will also be applicable to the suspected or actual misconduct at work, for example, habitual lateness in reporting for duty, absence from work without Supervisor's consent or approval, insubordination, non-performance or other conduct that contravenes the company's rules or the employment contract, where appropriate.

2. In the event there is any security or physical searches is required for the investigation of the wrongdoings or complaint, the P&A Manager shall ensure that it is done in a non-intrusive manner, in a private space (where possible, under video surveillance) and done by an opposite sex without causing distress or discomfort to the employee.

3. ***Disciplinary procedure*** is available at [www.megasquare.com.my/publications/](http://www.megasquare.com.my/publications/).

### II. GRIEVANCE PROCEDURE

The Grievance Procedure is applicable to a problem or concern that an employee has about their work, working conditions, career progression, relationships with colleagues or managers or any other problem/concern encountered at work (including any harassment, bullying or any other wrongdoings as per Section A). The procedure shall be adopted by all employees and the relevant line manager, the Head of Department or the Personnel & Administration Manager and the Management team.

The Employee will not suffer any form of reprisal for reporting or raising a grievance, concern, issue.

#### 1. ***Dealing with grievances informally***

If an employee has a grievance or complaint or would like to whistle blow, such employee should, wherever appropriate, start by talking it over with his/her leader, supervisor or his/her head of department. Such employee may be able to agree a solution informally between he/she and the leader, supervisor or his/her head of department.

#### 2. ***Formal grievance***

At the discretion of the employee, the employee may choose to initiate whistle blow or raise the grievance or complaint through other channel (i.e. not through the leader, supervisor or his/her head of department), such employee may choose to raise the grievance or complaint through the following options:

- a) Anonymous option: the Company's "Let's Talk" portal available through QRCode scan (available on the departmental notice boards or accessible by URL: <https://megasquare.com.my/publications/>);
- b) speak or send an email to the Personnel & Administration Manager ( 05-5951555 / [sahul@megasquare.com.my](mailto:sahul@megasquare.com.my));
- c) speak or send an email to the General Manager ( 05-5951523 / [sywai@megasquare.com.my](mailto:sywai@megasquare.com.my)); or
- d) speak or send an email to the Managing Director ( 05-5951510 / [mfwai@megasquare.com.my](mailto:mfwai@megasquare.com.my)); or
- e) send an email to [concern@megasquare.com.my](mailto:concern@megasquare.com.my).



**3. *Receipt of grievance, concern, issue raised by employee***

No matter how the employee chooses to raise the grievance, issue, or concern, his/her identity will be kept confidential by the management team and investigation will be conducted fairly and objectively without the involvement of anyone whom the grievance, issue or concern is related to or is in conflicted interest.

All grievance, concern, issue raised by employee, the progress and outcome of the investigation will be reported to and/or reviewed by the top management team.

**4. *Grievance hearing***

If the Company is able to contact the employee, a meeting with the concerned employee within 2 weeks will be arranged to discuss and investigate the grievance raised, unless such grievance is raised anonymously which the Company is not able to contact the employee. The concerned employee has the right to be accompanied by a colleague at this meeting. Upon conclusion of investigation and the action plan, the P&A Manager or the relevant HOD will communicate the outcome and action plan following the investigations to the concerned employee.

**5. *Appeal***

If the employee who raises a concern under this procedure is unhappy with the decision and such employee should appeal through the channels provided in section 2 above. An appeal meeting will be arranged and attended by a more senior manager, e.g. the General Manager or the Managing Director. After the meeting, a decision will be provided and the decision from the appeal meeting is final.

**If you have any questions regarding any of the policy guidelines listed above, please contact your Supervisor, your Head of Department or the Personnel & Administration Manager.**