



DIGITAL INTELLIGENCE

CODE OF CONDUCT POLICY

CODE OF CONDUCT

1. Introduction

- 1.1 MSD Digital Intelligence Sdn Bhd (MSDDI) is committed to maintaining the highest standards of ethical behavior, integrity and professionalism in all aspects of its operations. This Code of Conduct outlines the expected behaviour and ethical standards that all directors, employees, officers and representatives must follow to ensure a positive and productive working environment.
- 1.2 By adhering to this policy, we aim to build a company culture that fosters trust, respect and accountability in our interactions with colleagues, clients and stakeholders.

2. Purpose

The purpose of this Code of Conduct is to:

- 2.1 Provide guidance on the ethical standards expected of all individuals associated with MSDDI;
- 2.2 Promote an organisational culture based on mutual respect, fairness and professionalism;
- 2.3 Ensure compliance with applicable laws, regulations and company policies; and
- 2.4 Safeguard the reputation of the company and enhance its credibility amongst stakeholders and the industry.

3. Scope

- 3.1 This policy applies to all directors, employees, officers, contractors, consultants and anyone representing MSDDI in any capacity.
- 3.2 It applies during work hours, at company events and in any situation where employees are representing the company, including social media and personal interactions that may affect the company's reputation.

4. Core Principles and Ethical Standards

We expect all individuals, including directors, employees, officers, contractors, consultants and anyone representing MSDDI in any capacity (hereinafter referred to as Parties), to adhere to the following core principles and ethical standards :

4.1 Compliance with laws

- 4.1.1 All Parties are required to observe the company's policies and the laws of Malaysia and play an active role to ensure the company's compliance to laws governing the company and its legal obligations.
- 4.1.2 All Parties are expected to be ethical and responsible while discharging their duty and uphold highest standard of ethics.

4.2 Respect in the Workplace

- 4.2.1 Employees must respect their colleagues and be professional in the day-to-day dealings be it in the workplace or outside.
- 4.2.2 The Company does not allow any kind of discriminatory behaviour, harassment or victimisation.
- 4.2.3 Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

4.3 Professionalism at the Workplace

- 4.3.1 Employees shall observe the highest standard of professional conduct and always conduct themselves with integrity and decorum and must not under any circumstances commit any act or omission that would bring damages to the Company, its property, reputation or general interest.
- 4.3.2 The Company does not tolerate behaviour that interferes with the employee's ability to perform his or her duties.

4.3.3 Use or effects of alcohol or illegal drugs are not acceptable.

4.4 Company property and proprietary information

4.4.1 Employees shall treat all company's property, whether material or intangible and all its intellectual property with respect and care and shall not disclose the same to any party without approval from the Management.

4.4.2 Maintain confidentiality and proprietary information such as product data, pricing, financial data, customer names/addresses or non-public information about other companies, including current or potential supplier and vendors.

4.4.3 Avoid misuse of company equipment or using it frivolously and avoid damage or vandalism. Safeguard and prevent abuse and unauthorise use of the company's intellectual properties and materials.

4.5 Dress Code

4.5.1 All employees must be clean and well-groomed. Grooming styles dictated by religion and ethnicity is allowed so long as it is appropriate and does not offend others.

4.5.2 All clothes must be work-appropriate and must project professionalism. Clothes that are too revealing or inappropriate are not allowed.

4.5.3 All clothes must be clean and in good shape and all employees shall maintain good personal hygiene at all times.

4.5.4 Employees must avoid clothes with logos, graphics, symbolism, stamps or words that are offensive or inappropriate. Work clothes shall not indicate or carry any political affiliation.

4.6 Sexual Harassment

The following are prohibited by the Company;

- 4.6.1 Commenting on somebody's appearance, sexual orientation, or gender in a derogatory or objectifying way, or in a way that makes them uncomfortable.
- 4.6.2 Proposing, demanding or insinuating sexual favours.
- 4.6.3 Sexual assault.
- 4.6.4 Creating, posting or viewing sexually offensive materials in the workplace.
- 4.6.5 Flirting with somebody or pursuing them persistently against their will.
- 4.6.6 Using obscene comments, gestures, pranks, and jokes that degrade or offend somebody.
- 4.6.7 Sending or displaying sexually explicit objects or messages.
- 4.6.8 Invading somebody's personal space, for example by touching them inappropriately.
- 4.6.9 Threatening, coercing, stalking, or intimidating somebody to pressure them to engage in sexual acts.

4.7 Conflict of interest

Employees shall adhere to the Conflict of Interest & Gifts Policy as set out by the Company (please refer to the said document).

4.8 Gifts or Entertainment

Employees shall adhere to the Conflict of Interest & Gifts Policy as set out by the Company (please refer to the said document).

4.9 Whistleblowing

4.9.1 The Company encourages employees to report or disclose any improper conduct by any employee, supplier, business partner, clients or any parties that has come to their knowledge which includes but not limited to ;

- a) Fraud
- b) Bribery
- c) Abuse of Power
- d) Conflict of Interest
- e) Theft or Embezzlement
- f) Misuse of Company's Property
- g) Non-Compliance with Procedure

4.9.2 Whistleblowers are encouraged to report in good faith or to raise a concern about any attempted, suspected and/or actual bribery or corrupt practices that violates any law, policy, guideline or SOP at the earliest possible stage using the reporting channel provided.

4.9.3 All reports made under this policy will be treated with the utmost confidentiality.

4.9.4 MSDDI values transparency and integrity and encourages a workplace culture where individuals feel comfortable raising concerns about unethical behavior. We are committed to maintaining a safe and ethical work environment and will take appropriate action to address any misconduct or unethical practices.

4.9.5 For further details, please refer to the Whistleblowing Policy as set out by the Company.

4.10 Work hours and tardiness

4.10.1 Employees must report for work at the assigned/scheduled work hours. Immediate superior must be notified immediately if the employee is late to work.

4.10.2 Employees are prohibited from leaving work prior to the end of work hours without prior approval of immediate superior.

4.10.3 Follow strictly meal/break period.

4.10.4 An employee shall be deemed to have broken his contract if he/she has been continuously absent from work for more than two consecutive working days without prior leave, unless with a reasonable excuse for such absence and has informed or attempted to inform his employer of such excuse prior to or at the earliest opportunity during such absence.

4.11 Safety, health and environment

4.11.1 The company strives to ensure high standards of compliance with regards to safety, health and environment practices.

4.11.2 It is everybody's responsibility to ensure a safe work environment.

4.11.3 The below incidents and activities must be reported immediately to the company via established channel :

- a) Accidents and potential hazards
- b) Potential safety hazards and faulty equipment or facilities.
- c) Report any activity that you recognise as an unsafe work practice or failure to comply with the established procedures
- d) Any company activities or individual behaviour or acts that effects the environment.

4.12 Disciplinary action

4.12.1 Employees shall adhere to the company's policies and the code of conduct.

4.12.2 Failure to comply to the above shall results in disciplinary action including dismissal, suspension, demotion or any other action deemed suitable based the company's processes.

4.12.3 Action may also be pursued in cases of corruption, theft, embezzlement or other unlawful behaviour.

4.13 Grievance Management

- 4.13.1.1 Employees are advised to lodge a grievance report if they are being unfairly treated or are/were subjected to any forms of treatment that is inconsistent with the company's code of conduct and business ethics or is inconsistent with fair and equal treatment of employees.
- 4.13.2 All grievance report shall be handled with utmost confidentiality and care throughout the process and shall be dealt with promptly. The employee shall be kept informed on the progress and outcome of the investigations and actions taken. The Company endeavours to resolve all grievances within fourteen (14) working days, failing which, the employee shall be kept notified.
- 4.13.3 Should the employee be unsatisfied with the action taken by the Company, the employee may lodge a report with the CEO and/or to the Board of Directors.

5. Review and issuance of further policy / guidelines

- 5.1 The Company reserves the right to amend this policy from time to time and shall notify all employees when such amendment has been made and has been approved by the Management.
- 5.2 The Company will, from time to time, issue further policy and/or guidelines to complement and elaborate on the provisions of this Code of Conduct eg. Conflict of Interest Policy, Gifts, Donation and Sponsorship Policy, Whistleblowing Policy etc.