# EMPLOYEE CODE OF ETHICS AND BUSINESS CONDUCTS

## Introduction

Sena Group expects all employees to accept responsibilities for adhering to business principles in matters of personal conduct and to exhibit a high degree of personal integrity.

### 1.0 Conduct Expectations

All employees are Sena Group of Companies representatives no matter the employee is on or off duty. All employees are encouraged to always observe the highest standards of professional conduct.

Sena Group requires a high degree of personal integrity and responsibility of its employees. Conduct considered acceptable involves not only sincere respect for the rights and feelings of others but also the assurance that conduct in both business and personal life avoids any action that might (1) be harmful to the employee, other employees, the Company; or (2) cause any unfavourable reaction from current or potential customers.

### 1.1 Professionalism

Employees are expected to conduct themselves professionally at all times. This includes treating colleagues, clients, and customers with respect, maintaining a neat and appropriate appearance, and acting in a manner that reflects positively on the organization.

### 1.2 Conflict of Interest

Employees should avoid situations that create a conflict of interest between their personal interests and the interests of the organization. If a conflict arises, employees must disclose it promptly to their supervisor or the appropriate department.

### 1.3 Bribery and Corruption

Employees shall not offer, give, solicit or accept any bribes in order to achieve any business or personal advantage for themselves or others or engage in any transactions that contravene any applicable anti-bribery or any corruption laws.

### 1.4 Confidentiality

Employees must respect the confidentiality of sensitive information they have access to during their employment. This includes, but is not limited to, customer data, financial information, trade secrets, and intellectual property. Any unauthorized disclosure of use of confidential information is strictly prohibited.

### 1.5 Use of Company Resources

All company resources, including equipment, technology, and facilities, should be used responsibly and for legitimate business purposes only.

### 1.6 Anti-Discrimination and Harassment

We are committed to providing a workplace free from discrimination, harassment, and retaliation. Employees must treat others with fairness, respect their diversity, and refrain from engaging in any form of discriminatory or harassing behaviour based on race, colour, religion, gender, sexual orientation, age, disability, or any other protected characteristic.

## 1.7 Misconduct

Violations of Company or departmental rules may constitute misconduct for which an employee may be immediately suspended with half (1/2) pay, pending a complete investigation. All alleged violations should be thoroughly investigated and documented. The decision should be based on a logical analysis of the evidence. Although the following list is not all inclusive, these specific violations may result in severe disciplinary action up to and including discharge:

- Conviction of a crime involving job-related conduct.
- Deliberate falsification of applications or other Company-related documents, including electronic records, wage and/or time sheets, clocking another employee's time card.
- Unauthorized possession of firearms or other dangerous weapons on Company property.
- Fraudulent activities.
- Disloyalty / breach of confidentiality• theft, including unauthorized possession of Company or customer property or the property of other employees.
- Failure to report a vehicle accident or occurrence.
- Disruptive conduct while on duty or while on Company property.
- Insubordination or wilful disobedience to follow instructions or promptly perform assigned work without valid reason.
- Threatening, intimidating, coercing, directing abusive language, or displaying blatant or public disrespect toward any employee or customer while on duty, on Company property, at collection sites, or at off-site Company meetings and functions.

Violent or threatening behaviour is not tolerated in the workplace. All employees are responsible for advising management, the Sena Group of Companies Human Resources Department of any actual or potential violence.

- Openly making or publishing false, vicious, or malicious statements concerning the Company, any employee, or customer.
- Possessing and/or using alcohol/drugs on work premises or while on duty.
- Negligence.
- Absenteeism, lateness; generally, a dismissal if preceded by warnings against the continuation of the behaviour.
- Assaults, fighting while on duty, at Company functions or on Company property.
- Damage, destruction, interruption of use, or defacement of Company property, facilities, information systems and applications, or equipment as a result of deliberate or negligent action.
- unauthorized use of Company facilities, assets, or systems, including but not limited to :

1. personal use of Company fax machines
2. inappropriate/personal use of Internet, and internet e-mail
3. personal use of COMAIL
4. use of Company long distance telephone facilities for personal calls
5. personal or other improper use of Corporate name, propriety logo, or various trademarks

• violation of safety regulations, including:

1. failure to wear/use protective equipment/devices when provided and/or required (e.g., safety shoes, ear and eye protection)
2. requiring or allowing subordinates to work unsafely or under unsafe and/or unhealthy conditions
3. failure to ensure subordinates attend required safety training

• Violation of security regulations.

• Wearing unauthorized badges, insignias, pins, or other devices while on duty or on Company property.

• Solicitation by employees during their working time, solicitation of other employees during their working time, or distribution at any time in working areas of the Company.

• Leadership failure of a member of management.

• Breach of Company rules or any other act obviously and significantly detrimental to the best interest of Sena Group and/or fellow employees as determined by management.

Sena Group may, after due inquiry, terminate an employee's employment immediately on the grounds of misconduct. No notice period need be given and no wages in lieu of notice is payable.

**2.0 Fitness for Duty / Drug-Free Workplace**

Fitness for Duty/Drug-Free Workplace guidelines apply to all Sena Group employees and all persons entering Company buildings, vehicles, or property (employees on leave of absence are also covered by this policy).

Sena Group is committed to a drug-free workplace in the interest of safety for its employees and the public. The Company supports and complies with all applicable local laws and regulations through enactment of Fitness for Duty/Drug-Free Workplace. Sena Group reserves the right to perform a drug screen on any employee at any time in accordance with local laws. Upon completion of an investigation and due inquiry confirming violations related to drugs and alcohol, as specified in the Fitness for Duty / Drug-Free Workplace section of this policy, the employee is dismissed.

**2.1 Drugs**

Sena Group prohibits the unauthorized possession, sale, manufacture, distribution, known transportation, or non-prescription use of controlled substances (including but not limited to opiates, marijuana, phencyclidine [PCP], amphetamines, cocaine, ecstasy, and other addictive drugs). In particular, the Company expressly prohibits unlawful drug use by its employees at any time, on or off duty.

2.1.1 Abuse of Legitimate Prescription

Sena Group prohibits the abuse of legitimately prescribed drugs while on or off duty. Abuse includes dependence and/or using a drug for reasons other than for the purposes of the initial prescription by the individual for whom the drug was prescribed. Abuse also includes an employee's use of a drug for a bona fide condition when the drug was prescribed for another person, such as a friend or family member.

2.1.2 Prescription Use Notification

Employees determined to be in safety sensitive positions who are taking prescription drugs prescribed for their own use (including but not limited to central nervous system depressants, stimulants, and narcotic analgesics) that may jeopardize their safety or the safety of other employees or the public while they are performing their normal duties must provide management with a doctor's statement attesting that the prescription drugs will not interfere with their ability to perform their normal duties and responsibilities. Sena Group reserves the right to have any treating doctor's recommendation reviewed by a Company-appointed physician.

2.1.3 Conviction Notification

Employees convicted under a criminal drug statute for violation must provide written notification to their management no later than 5 calendar days after the conviction.

## 2.2 Alcohol

Unauthorized use, or being under the influence of alcohol is prohibited while on Company property, vehicles, and aircraft. Consumption of alcoholic beverages is also prohibited during work hours, including, for the purpose of this policy, the meal period, breaks, and standby or on-call hours.

## 2.3 Termination

An individual's employment is terminated whenever an investigation confirms a Fitness for Duty / Drug-Free Workplace violation. Violation occurs when

• A verified positive drug screen indicates drugs in employee's system.

• There is use of alcohol or use or possession of an illegal drug by the employee.

• An employee refuses to provide a urine sample for a drug screen, adulterates the urine specimen, or refuses to submit to an alcohol test.

• Any employee fails to show for a scheduled random or other required test after receiving notification.

Employees terminated for Fitness for Duty violation are ineligible for rehire.

2.3.1 Reasonable Suspicion

An employee in any position may be tested when there is reasonable suspicion that Fitness for Duty/Drug-Free Workplace has been violated. Reasonable suspicion may be established by an investigation that may include but is not limited to

• observation of the employee's behaviour, such as direct observation of drug use or possession and/or the physical symptoms of being under the influence of drugs

• Reports from employees or other witnesses.

• Abnormal conduct or erratic behaviour.

• Evidence that the employee has tampered with the collection process.

If an employee is suspected of using unauthorized drugs, the appropriate manager gathers all information, facts, and circumstances leading to and supporting this suspicion.

2.3.2 Report of Controlled Substance Convictions

Employees who are convicted of controlled substance violations under any criminal drug statute or who plead guilty or nolo contendere (no contest) to such charges must inform Sena Group management within 5 days of conviction or plea. Failure to do so results in disciplinary action, up to and including termination.

2.3.3 Company's Right to Assess and Test

Sena Group reserves the right to request an employee or groups of employees to submit to assessment and testing when, based on observed behaviour or other information, there is reason to believe the employee has used drugs or alcohol in violation of Fitness for Duty/Drug- Free Workplace. Failure to submit to this assessment and test results in termination.

2.3.4 Local Laws

When applicable local laws conflict with this policy, the local laws are followed, and management and the Human Resources Department must consult with the Legal Advisor for advice.

2.3.5 Exclusions

This policy does not prohibit consumption of alcoholic beverages at Company functions off Company property with the approval of management. However, participants are expected to exercise proper judgment and may be disciplined for improper behaviour.

Further, this policy does not prohibit employees from transporting originally sealed alcoholic beverages in their luggage while traveling, nor does it prohibit the giving of alcoholic beverages as gifts. Possession of such gifts on Company premises is authorized as long as the beverages remain sealed.

**3.0 Time Cards / Attendance records**

Employees are required to report to work on time and to complete a daily clocking in and out attendance records on their own. These include, but are not limited to, recording or punching in all start and stop times.

3.1 Falsification/Discipline

Completion of the time card or attendance records of another employee and/or falsification of one's own time card is a serious offense and may result in termination.

3.2 Retention

All time cards / attendance records, as well as payroll records for part-time employees must be retained for a period of 2 years on-site at the employee's station/department.

If any of these records are the subject of investigation, termination, or litigation, they should not be destroyed until after their dispositions.

Departmental management determines the necessity of using time cards and the job classifications affected.

**4.0 Smoking**

Smoking is strictly PROHIBITED in the Company premises and compound as stipulated under Food Act 1983 (Control of Tobacco Product Regulations 2004-Part IV, Regulation 11). An Employee who fails to comply with this regulation shall be subject to disciplinary action including a fine not exceeding RM10,000 or imprisonment not exceeding 2 years.

**5.0 Sexual Harassment**

The Company recognizes that an Employee has the right to be treated with dignity and respect. The Company will not tolerate behaviour which might constitute sexual harassment and will do everything reasonably practicable to prevent it from occurring.

A sexual harassment is defined as any unwanted conduct of sexual nature, whether verbal, non-verbal, visual, gestural, or physical, directed at a person, which is offensive or humiliating or is a threat to his well-being, arising out of and in the course of the employment.

An Employee must cooperate in ensuring harassment-free work environment exists, by refusing to accept or participate in any **behaviours** which constitute sexual harassment.

If proven, sexual harassment is considered as an act of misconduct, and will be dealt with under the Company's disciplinary process.

## 6.0 Disciplinary Actions for Policy Violation

6.1 Investigative / Inquiry Suspension

Investigative suspensions for the purpose of providing management with additional time to conduct further investigation are with half (1/2) pay. All investigative suspensions are normally communicated to the employee in writing. Investigative suspensions should be completed as soon as possible.

If the inquiry does not disclose any misconduct / the employee is not found guilty, then the Company shall restore the full amount of pay for the number of days the employee was on investigative suspension with half pay.

Where possible, the employee is informed of the decision within 14 calendar days of the completion of the investigation.

The employee must fully cooperate with management in the investigation / inquiry.

6.2 Written Warning

Based on the results of the investigative suspension, management may return the employee to work and issue a written warning as a means of discipline for the policy violation. Written warnings for unacceptable conduct serve as a notification of behavioural deficiency, and are active for 12 months from the date stated on the written warning. In addition, employees with active written warnings are prohibited from submitting a Job Change Application. (This period is adjusted forward for the number of days an employee spends on a leave of absence without pay that exceeds 30 days.) Three written warnings within a 12-month period normally results in termination, depending on the severity of the offence committed. The nature of the 3 infractions need not be related (conduct and/or performance) to warrant dismissal.

Employees must understand that recurrent patterns of misconduct are noted and cannot be tolerated. Management should consider the relative nature of all infractions for disciplinary purposes. An employee's entire employment history is reviewed and considered when evaluating recurring patterns of misconduct. Issue of a written warning for a deficiency previously addressed through 1-5 Personal Conduct can result in more severe action up through termination.

6.3 Disciplinary Suspension

If a decision is made not to terminate an employee for serious violation of a Company policy, the manager may, after due inquiry, suspend the employee without pay for a maximum of 14 calendar days or demote the employee. However, disciplinary suspensions/demotions are given only when they are considered to be in the best interest of the Company and the infraction is of a severe nature. A disciplinary suspension must have the prior concurrence of the Human Resources Department, and must be in writing in the form of a written warning, outlining the reasons for the suspension and the applicable dates.

## 7.1 Criminal Charges

Upon notification that an employee has been charged with a crime, management must consult with the Human Resources Division. Only crimes that are job-related and involve conduct that violates Corporate policy should result in suspension and investigation. The classification of the crime is not as important an issue as the underlying conduct itself. For example, crimes related to illegal use and possession of drugs are considered job-related based on Corporate policy. On the other hand, a DUI (Driving Under the Influence of Alcohol) charge in which an employee is in his private vehicle would not be job-related unless the individual holds a position that requires driving a Company vehicle. Other situations that would not necessarily be job-related are not ordinarily a basis for suspension and investigation. Examples of other crimes to consider thoroughly for job-relatedness are shoplifting, theft, etc. It is important to involve Human Resources in determining whether a crime is job-related. Depending upon the situation, any of the following actions might be taken:

- Investigative suspension of employee with half pay.
- Investigate and make a decision within 14 calendar days whether to:
    1. Extend the suspension with full pay pending disposition, unless additional facts indicate another appropriate action such as termination. OR
    2. Return the employee to work pending disposition.

- Upon outcome of inquiry, employee either

    1. Returns to active status. OR
    2. Is terminated.

Depending upon the severity of the charge, the employee's past work history, the relationship of the charge to the present job function, and other mitigating circumstances, management and the Human Resources manager, upon consultation with the Legal Advisor, make a decision regarding continued employment. The disposition (conviction, acquittal, dismissal without prosecution, or diversion) does not automatically determine whether an employee is retained or terminated. The decision to return the employee to active status or terminate depends upon the impact such disposition and the relevant facts have on other employees, the Company, and current or potential customers. Suspended employees permitted to return to work after resolution of the charge may be entitled to back pay, not to exceed ninety (90) calendar days. The issue of back pay is determined by an officer of the division and each case is reviewed individually.

**8.0 Documentation**

Complete documentation of all actions taken by management related to misconduct is essential. All discharges, disciplinary suspensions, and written warnings should contain: -

- date of infraction
- facts supporting the suspension, written warning and/or termination
- policy violated (a copy of violated policy should be attached to termination letter)

All disciplinary actions normally should be initiated within seven (7) calendar days of the conclusion of the investigation.

Receipt of the written warning should be confirmed by the employee's signature, or if the employee refuses to sign, a witness should confirm receipt. The manager must retain all original documents and provide a copy to the employee and Human Resources Department.