



2<sup>nd</sup> May 2023

## CODE OF ETHICS AND BUSINESS CONDUCT

### **BUILD TRUST AND CREDIBILITY**

The success of our business is dependent on the trust and confidence we earn from our employees and customers. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honourable conduct. It is easy to *say* what we must do, but the proof is in our *actions*. Ultimately, we will be judged on what we do. When considering any action, it is wise to ask: will this build trust and credibility for **EAGLERISE MALAYSIA SDN. BHD.** Will it help create a working environment in which **EAGLERISE MALAYSIA SDN. BHD.** can succeed over the long term? Is the commitment I am making one I can follow through with? The only way we will maximize trust and credibility is by answering “yes” to those questions and by working every day to build our trust and credibility.

### **RESPECT FOR THE INDIVIDUAL**

Our **Code of Conduct policy** outlines our expectations regarding employees’ behaviour towards their colleagues, supervisors and overall organization. All employees should respect their colleagues. We won’t allow any kind of discriminatory behaviour, harassment or victimization. Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

We promote freedom of expression and open communication. But we expect all employees to follow our code of conduct. They should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well-organized, respectful and collaborative environment.

We all deserve to work in an environment where we are treated with dignity and respect. **EAGLERISE MALAYSIA SDN. BHD.** is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone’s talents go to waste.

**EAGLERISE MALAYSIA SDN. BHD.** is an affirmative action employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behaviour. Any employee who feels harassed or discriminated against should report the incident to his/her manager or to human resources.

### **CREATE A CULTURE OF OPEN AND HONEST COMMUNICATION**

At **EAGLERISE MALAYSIA SDN. BHD.** everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

**EAGLERISE MALAYSIA SDN. BHD.** will investigate all reported instances of questionable or unethical behaviour. In every instance where improper behaviour is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

### **COMPLIANCE WITH LAW**

**Eaglerise Malaysia Sdn. Bhd.** 202201047808 (1493505-u)

Office: 18, Jalan Tiang U8/92, Seksyen U8, Taman Perindustrian Bukit Jelutong, 40150 Shah Alam, Selangor Darul Ehsan, Malaysia.  
www.eaglerise.com



**EAGLERISE MALAYSIA SDN. BHD.** commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. All employees must protect our company's legality. They should comply with all environmental, safety and fair dealing laws. We expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

#### **PROPRIETARY INFORMATION**

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

#### **SAFETY AND HEALTHY WORKPLACE**

**EAGLERISE MALAYSIA SDN. BHD.** is dedicated to maintaining a healthy environment. The safety and health of our employees is a high importance. Our policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements. We work to provide and maintain a safe, healthy and productive workplace, in consultation with our employees, by addressing and remediating identified risks of accidents, injury and health impacts.

#### **CHILD LABOUR**

**EAGLERISE MALAYSIA SDN. BHD.** commits to comply with the minimum age for admission to as well as the prohibit the hiring of individuals that are under 18 years of age for all positions.

#### **WORK HOURS, WAGES AND BENEFITS**

We compensate employees competitively relative to the industry and local labour market, and in accordance with terms of applicable collective bargaining agreements. Workers are provided with a total compensation package that includes wages, overtime pay, benefits and paid leave which meets or exceed the legal minimum standards. Workers are not required to work more than the regular and overtime hours allowed by the labour law. All overtime work is paid at the rate defined by law.

#### **CONFIDENTIAL AND PROPRIETARY INFORMATION**

Integral to **EAGLERISE MALAYSIA SDN. BHD.** business success is our protection of confidential company information, as well as non public information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or non public information about other companies, including current or potential supplier and vendors. We will not disclose confidential and non public information without a valid business purpose and proper authorization.

#### **DIVERSITY AND INCLUSION**

**EAGLERISE MALAYSIA SDN. BHD.** is committed to fostering, cultivating and preserving a culture of diversity

**Eaglerise Malaysia Sdn. Bhd.** 202201047808 (1493505-u)

Office: 18, Jalan Tiang U8/92, Seksyen U8, Taman Perindustrian Bukit Jelutong, 40150 Shah Alam, Selangor Darul Ehsan, Malaysia.  
www.eaglerise.com



and inclusion. We are committed to equal opportunity and are intolerant of discrimination and harassment. We embrace and encourage our employees' differences workplaces on basis of race, sex, colour, ethnicity, religion, age, socio-economic status, or other characteristics that make our employees unique and any other status protected by applicable law. The basis for recruitment, hiring, placement, development, training, compensation and advancement at the Company is qualifications, performance, skills and experience. We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment is not tolerated in the workplace and in any work-related circumstance outside the workplace.

### **PROTECTION AND USES OF COMPANY RESOURCES**

All employees should treat our company's property, whether material or intangible, with respect and care.

Employees:

- Shouldn't misuse **company equipment** or use it frivolously.
- Should respect all kinds of **incorporeal property**. This includes trademarks, copyright and other property (information, reports etc.) Employees should use them only to complete their job duties.

Employees should protect company facilities and other material property from damage and vandalism, whenever possible. Employees are trusted to behave responsibly and use good judgement to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to non-profit organizations.

In order to protect the interests of the **EAGLERISE MALAYSIA SDN. BHD.** network and our fellow employees, **EAGLERISE MALAYSIA SDN. BHD.** reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or **EAGLERISE MALAYSIA SDN. BHD.** Intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

- **Professionalism**

All employees must show integrity and professionalism in the workplace:

- **Corruption**

We discourage employees from accepting gifts from clients or partners. We prohibit bribes for the benefit of any external or internal party.

- **Job duties and authority**

All employees should fulfil their job duties with integrity and respect toward customers, stakeholders and the community. Supervisors and managers mustn't abuse their authority. We expect them to delegate duties to their team members taking into account their competences and workload. Likewise, we expect team members to follow team leaders' instructions and complete their duties with skill and in a timely manner.



- **Absenteeism and tardiness**

Employees should follow their schedules. We can make exceptions for occasions that prevent employees from following standard working hours or days. But, generally, we expect employees to be punctual when coming to and leaving from work.

- **Conflict of interest**

We expect employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties.

- **Collaboration**

Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

### **DISCIPLINARY ACTIONS**

Our company may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our code of conduct. Disciplinary actions will vary depending on the violation.

Possible consequences include:

- Demotion.
- Reprimand.
- Suspension or termination for more serious offences.
- Detraction of benefits for a definite or indefinite time.

We may take legal action in cases of corruption, theft, embezzlement or other unlawful behavior.

### **DO THE RIGHT THING**

Several key questions can help identify situations that may be unethical, inappropriate or illegal.

Ask yourself:

- Does what I am doing comply with the **EAGLERISE MALAYSIA SDN. BHD.** guiding principles, Code of Conduct and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if it made the headlines?
- Am I being loyal to my family, my company and myself?
- What would I tell my child to do?

Each of us is personally responsible for supporting our core values, which require compliance with the law as well as ethical conduct. A commitment to integrity, acting honestly and ethically, and complying with the letter and intent of the law are critical to our continued success.

Your sincerely,

**EAGLERISE MALAYSIA SDN. BHD.**

**Eaglerise Malaysia Sdn. Bhd. 202201047808 (1493505-u)**

Office: 18, Jalan Tiang U8/92, Seksyen U8, Taman Perindustrian Bukit Jelutong, 40150 Shah Alam, Selangor Darul Ehsan, Malaysia.  
[www.eaglerise.com](http://www.eaglerise.com)