



## **MDEC CODE OF CONDUCT FOR EMPLOYEES**

*(incorporated under Section 3 of MDEC Employee Handbook)*

This Code of Conduct (“**Code**”) outlines the required standards of integrity and business ethical conduct for employees. However, it may not address every specific circumstance or scenario that may arise and shall be read in tandem with other MDEC’s applicable policies, procedures and/or guidelines. Employees shall consult, seek guidance and clarification from the performance manager and/or Human Resources & Administration Department (“**HRA**”) when in doubt or where interpretation is required.

### **3.1 SCOPE AND COMPLIANCE**

- 3.1.1 This Code applies to all employees of MDEC, including its subsidiaries.
- 3.1.2 All employees are required to comply with this Code. Being unaware or pleading ignorance of this Code shall not be accepted as a valid justification for any breach.
- 3.1.3 Non-compliance with any of the provisions of this Code may result in appropriate disciplinary action (including termination, demotion and/or suspension) and if warranted, may also be subjected to legal proceeding, in accordance with MDEC’s established policies and procedures.
- 3.1.4 Any disciplinary proceeding shall be conducted in accordance with the applicable laws and MDEC’s established policies and procedures, including among others, ensuring the employees’ rights to be heard.
- 3.1.5 MDEC reserves the right to amend, supplement, replace, or otherwise revise this Code at its sole discretion every three (3) years or, as and when deemed necessary.
- 3.1.6 The Performance Managers and Heads of Department are responsible for ensuring all employees under their supervision are aware of, understand, and comply with this Code.

### **3.2 OBJECTIVES**

- 3.2.1 This Code is intended to:
  - a) support all employees in embodying and upholding MDEC’s core values, mission, and vision;
  - b) provide clear requirements to employees in the execution of their duties and responsibilities at MDEC; and
  - c) outline expectations for employees’ conduct both within and outside the workplace/approved working space during the performance or carrying out of duties and responsibilities, particularly in situations where they may be identified as representatives of MDEC.

### **3.3 GENERAL REQUIREMENTS**

- 3.3.1 Employees shall demonstrate their undivided commitment to MDEC. Employees' conduct encompasses behavior both during and outside working hours while performing duties and responsibilities as an employee and shall not negatively impact on the employee's own performance, the performance of other employees or the interests of MDEC, and/or image/reputation of MDEC.
- 3.3.2 Employees shall not engage in any activities that may tarnish the image/reputation of MDEC, bring disrepute and discredit or adverse effect to MDEC.
- 3.3.3 Employees shall observe and comply with all statutory laws, regulations and MDEC's policies, procedures, guidelines and/or requirements at all times.
- 3.3.4 Employees are required, upon request by MDEC and/or any enforcement authority to promptly provide explanation and/or justification in the event the employees live beyond official emoluments or legitimate private means. Failure to provide a reasonable explanation and/or justification may result in appropriate action including disciplinary action.
- 3.3.5 Employees are required on all occasions to discharge their duties and responsibilities with a high standard of professionalism, duty of care, dedication, transparency, honesty, integrity, goodwill and courtesy as well as to demonstrate traits of proactiveness, cooperation, innovation and accountability.

### **3.4 WORKPLACE CULTURE AND ENVIRONMENT**

- 3.4.1 Employees shall strive to maintain a healthy, safe and productive work environment which is free from discrimination or harassment based on race, political opinion, membership in political group, gender, sexual orientation, marital status, national origin, disability, age or other factors that are unrelated to MDEC's business interests.
- 3.4.2 Employees shall avoid any conduct in the workplace that creates, encourages, or permits an offensive, intimidating, or inappropriate work environment including, but not limited to:
  - a) directly or indirectly give, agree to give, promise or offer to any person, or accept, agree or promise to accept from any person, any bribes or gratifications, whether for the benefit of that person or another person, to achieve any business or personal advantage for themselves or others, in any transaction with MDEC, whether said actions contravene with any applicable anti-bribery or anti-corruption laws or otherwise;
  - b) threats or comments that contain elements of discrimination or harassment;
  - c) sexual advances;
  - d) violent behavior or actions;
  - e) harassment, discrimination, bullying, or other forms of intimidation or oppression;
  - f) misuse or abuse of position/power/authority/control/influence/process;
  - g) violation of the dress code of MDEC;
  - h) possession of weapons of any type;
  - i) use, possession, distribution or sale of illegal drugs or any prohibited

- substance (except for approved medical purposes);
  - j) consumption of alcoholic beverages at MDEC's premises;
  - k) consumption of alcoholic beverages outside MDEC's premises which adversely affect the employees' performance or ability to fulfil their duties and responsibilities to MDEC; and/or
  - l) any other misconduct as determined by MDEC.
- 3.4.3 Employees shall not engage or be involved in any immoral behavior and activities such as gambling (including but not limited to online gambling), indecency, obscenity, vulgarity, or vices in MDEC's businesses, on MDEC's premises, during business trips/events, when representing MDEC or when identifiable as an employee of MDEC or when using MDEC's assets.
- 3.4.4 Employees are prohibited from smoking or using any tobacco products, including electronic cigarettes or vaping devices within MDEC's office premises except in specifically designated smoking areas (if any) as identified by MDEC.
- 3.4.5 Employees are expected to maintain a clean and organized workstation, including the surrounding areas. Files, documents, and office supplies shall be arranged neatly at all times, and no discarded materials shall be left on any work surface. All employees share a collective responsibility for ensuring the overall cleanliness and upkeep of the office environment.
- 3.4.6 MDEC places a high degree of emphasis on workplace safety, with the primary objective of preventing work-related injuries and fatalities. Accordingly, the employees shall fully comply with all applicable safety laws, regulations, guidelines, and internal procedures at all times during the course of employment, failure which may result in appropriate disciplinary action being taken against such employees.

### **3.5 ATTENDANCE**

- 3.5.1 MDEC expects regular attendance and punctuality. Employees with office-based responsibilities (e.g., those not engaged in client servicing or marketing functions) are expected to be present at their designated workstations/approved working space during official working hours, unless prior approval has been obtained from the respective Head of Department/performance manager (whichever is applicable).
- 3.5.2 Employees whose roles require attending external meetings or work at off-site-office are expected to keep their performance manager informed of their whereabouts at all times. Employees are also expected to remain contactable during official working hours.
- 3.5.3 Employees shall not be absent from work without leave or consent from Head of Department/performance manager (whichever is applicable).
- 3.5.4 In the event of being late or absent from work, employees are required to notify their Head of Department/performance manager (whichever is applicable) at the earliest possible. In cases where the Head of Department/performance manager

is not contactable, the employees are expected to inform other employees within the workgroup. The Head of Department/performance manager reserves the right to approve or deny the request based on reasonable judgment and consideration. Should the request be denied, the employees are expected to immediately report to work.

3.5.5 Notwithstanding the above, absenteeism and tardiness are strictly prohibited and MDEC reserves the right, after due process, to terminate the services of the employees.

3.5.6 Any non-attendance to the registered training is an act of misconduct unless otherwise stipulated and justified under the MDEC's applicable policies, procedures, guidelines and/or requirements.

### **3.6 ACCESS TO PREMISES**

3.6.1 Employees are required to wear MDEC identification cards at all times while on MDEC's office premises including satellite offices. Employees are to ensure that the access doors are securely closed when the employees enter or leave MDEC's office premises.

3.6.2 Access to MDEC's office premises is restricted to employees with valid MDEC identifications cards and/or with consent from the relevant MDEC's authorized personnel. For avoidance of doubt, employees who are suspended shall be restricted from accessing MDEC's office premises.

3.6.3 Employees are not allowed to bring personal visitors to MDEC's office premises, unless due to unavoidable circumstance (e.g. emergency) or permitted by the Head of Department/performance manager (whichever is applicable). All visitors on a business visit to the designated meeting area must be accompanied by the employees.

3.6.4 Employees are expected to observe the relevant MDEC's policies, procedures, guidelines and/or requirements in relation to safety, security and access to MDEC's office premises.

### **3.7 DRESS CODE**

3.7.1 Employees are required to be appropriately and decently dressed, as informed by HRA from time to time, as well as neat, tidy and well-groomed while at work and when representing the company. Smart casual attire is permitted unless otherwise determined by MDEC.

3.7.2 All employees are expected to wear formal business attire for meetings with clients/stakeholders, including business suits when appropriate. In addition, when visiting clients/stakeholders or working at clients/stakeholders' site, employees must adhere to the dress code expected by the clients/stakeholders. It is the employee's responsibility to determine in advance and comply with the clients/stakeholders' dress code preferences.

### **3.8 COMMUNICATIONS**

- 3.8.1 All communication channels provided by MDEC including emails, are strictly to be used for official MDEC's business purposes and shall not be used for personal matters unless otherwise stipulated under the applicable MDEC's policies, procedures, guidelines and/or requirements.
- 3.8.2 Employees shall refrain from making any statements or publish, whether on employees' social media, MDEC's social media or through other public channels, that could reasonably harm the image, reputation, or interests of MDEC and/or its clients/stakeholders.
- 3.8.3 Information and communication channels including connections to the internet shall be used for conducting MDEC's business, operations or for other purposes authorized by MDEC. It is prohibited to use the information and/or communication channels in a manner that interferes with employees' productivity and/or performance of duties and responsibilities.
- 3.8.4 Employees shall not use MDEC's official email or display MDEC's header/footer/letterhead or otherwise suggest such communications are authorized by MDEC for matters not related to the official business purposes, operations, functions, duties and/or responsibilities of the employees.
- 3.8.5 All communications channels/systems shall be used in a responsible manner consistent with this Code and/or other MDEC's relevant policies, procedures, guidelines and/or requirements in effect from time to time, including matters relating to cyber security, preservation of information and the usage of social media by employees.
- 3.8.6 Employees are expected to be aware of all email announcements, related news and information from the available communication channels.
- 3.8.7 Employees are expected to uphold and demonstrate communication behaviors consistent with the standards outlined in the MDEC Client Charter and/or any other similar MDEC's policies, procedures, guidelines and/or requirements.

### **3.9 USE OF MDEC'S ASSETS OR RESOURCES**

- 3.9.1 Access and possession of MDEC's assets, facilities, resources and records are provided on the basis of trust and confidence that they are to be used for MDEC's business and operation purposes only.
- 3.9.2 Employees are responsible for the safekeeping of all assets, facilities, resources and records belonging to MDEC that are provided to perform the employees' duties and responsibilities. Employees shall adhere to and comply with all MDEC's governing documents as amended and updated from time-to- time on the use of all assets, facilities, resources, and records, including to prevent theft, loss, damage and/or misuse.

- 3.9.3 In the event MDEC's assets/properties have been misappropriated, MDEC reserves the right to seek full restitution from the offending employee in accordance with clause 3.17 herein.

**3.10 CONFIDENTIALITY**

- 3.10.1 Employees shall not, without prior written consent/authorization, disclose or otherwise make use of any confidential, technical, procedural, administrative, commercial and/or financial information/data, regardless of its form pertaining to MDEC's business, operations, processes or affairs to any third party.
- 3.10.2 Employees shall seek consultation from the Legal Department on the need of executing an agreement for this purpose.
- 3.10.3 The usage of any information/data related to MDEC is subject to MDEC's applicable policies, procedures, guidelines and/or requirements.

**3.11 PERSONAL DATA PROTECTION**

- 3.11.1 Employees shall comply with the relevant and applicable laws, regulations and standards in relation to personal data protection including MDEC's internal personal data protection policies, procedures and guidelines.

**3.12 CONFLICT OF INTEREST**

- 3.12.1 A conflict of interest may arise when an employee is unable to carry out his/her official duties and responsibilities effectively and impartially due to any appointment, engagement, relationship, connection or activity that compromises transparency, good faith, due diligence, or integrity in the performance of his/her duties and responsibilities.
- 3.12.2 Employees have an obligation to act in the best interest of MDEC at all times. Employees are prohibited from using their position or information gained directly or indirectly in the course of their duties, responsibilities or employment for private or personal advantage (including for the benefit of their family and/or associate) or for any unauthorized purposes. Conflict of interest is not only limited to direct financial interest but also includes indirect financial interest and non-financial interest.
- 3.12.3 Employees shall exercise basic common sense in avoiding conflict of interest, act in a manner consistent with giving their full-time services to MDEC, and/or avoid situations which give rise to questions as to whether they have acted in the best interest of MDEC. Employees shall consult, seek guidance and clarification from the performance manager and/or HRA when in doubt or where interpretation is required.
- 3.12.4 Family means spouse, parent, grandparent, child, including adopted child and stepchild, grandchild, great-grandchild, brother, sister, son-in-law, daughter-in-law, brother-in-law, sister-in-law, uncle, aunt, cousin, niece, grandniece, great-

grandniece, nephew, grandnephew and great-grandnephew. This definition shall be applicable throughout this Code.

3.12.5 Associate is as defined under the Malaysian Anti-Corruption Commission Act 2009 ("**MACC Act**"), and the definition shall be applicable throughout this Code.

3.12.6 The following represents instances of conflict of interest:

**a) Outside appointment/engagement/undertaking**

Employees are not permitted to accept, hold or conduct any outside appointment/engagement/undertaking in his/her personal capacity with or for any other entity, company, firm, or organization other than MDEC. Any external appointment/engagement/undertaking in the said capacity including to act as a director, partner, advisor, agent, manager, consultant, judge or subject matter expert, and whether paid or unpaid, may only be pursued with consultation from HRA and prior written approvals as follows:

- i. if the employee to be appointed is the Head of Division, the approval shall be obtained from the Chief Executive Officer; and
- ii. for all other employees, the approval shall be obtained from the respective Head of Division.

**b) Outside directorship/partnership**

Employees shall not accept outside executive and non-executive directorship(s) or partnership in entities, which are either MDEC's supplier/recipient/participant/client/vendor/its sub-contractor of any tier which has any form of direct or indirect business dealings with MDEC. Should employees become involved in such directorships or partnerships, the employees have an obligation to immediately declare and disclose to HRA in writing of such circumstances and shall be abstained from participating in the deliberation, approval or voting process (if any) relating to MDEC's monetary and non-monetary business dealings or transactions involving the declared company or entity. Any deliberation, approval or voting process shall be conducted at arm's length principle.

**c) Direct ownership and/or family having ownership of equity in entity having business with MDEC**

- i. Employees shall not own, either directly or indirectly, e.g. through their family, shares or other forms of beneficial interest (herein collectively called "**Equity**") in:
  - a. privately owned entity which has family relationship, contractual or other business dealings or transactions with MDEC's employees or directors; or
  - b. privately owned entity which is either MDEC's supplier/recipient/participant/client/vendor/its sub-contractor of any tier which has any form of direct or indirect business dealings or transactions with MDEC.
- ii. Should employees become a direct or indirect owner of the Equity, the said employees shall immediately declare and disclose to HRA in writing of such circumstances, and the said employee shall abstain

from participating in the deliberation, approval or voting process (if any) relating to MDEC's monetary and non-monetary business dealings or transactions involving the companies of the declared Equity. Any deliberation, approval or voting process shall be conducted at arm's length principle.

- iii. Notwithstanding the above, the prohibition under the clause 3.12.6 (c) does not apply to Equity held by employees in public listed companies, which have a business relationship with MDEC. The employee holding such Equity shall declare and disclose to HRA in writing and shall abstain from participating in the deliberation, approval or voting process (if any) relating to MDEC's monetary and non-monetary business dealings or transactions involving the companies of the declared Equity. Any deliberation, approval or voting process shall be conducted at arm's length principle.

**d) Conflicting duties and responsibilities**

Employees, in the exercise of their authorities, duties, responsibilities or influence, shall not:

- i. give preference to the interest of their personal/family/associate rather than to the interests of MDEC;
- ii. participate in any assessment, deliberation, approval or voting process involving the said employees' family/associate;
- iii. supervise directly or indirectly any employee with whom the said employee has any family, romantic/intimate/close relationship that may influence the judgement or assessment; or
- iv. act as the recommending and approving authority (including being involved in any committee) within the same approval process.

**e) Contractual dealings with employees**

MDEC shall not purchase or lease property, equipment, or materials from, nor enter into any contractual arrangements (other than employment contracts) with its employees.

**f) Inside information on company business or operation**

- i. Certain employees, by virtue of their position, functions and/or authorized roles, may have access to confidential information concerning MDEC and/or its affiliates or associate. It is imperative that such confidential information is handled with the highest level of integrity and discretion to protect both the interests of MDEC and the relevant third party.
- ii. Employees shall not, under any circumstances, use confidential or non-public information obtained during the course of their employment for personal gain or to benefit others. This includes, but is not limited to,



engaging in insider trading, tipping, or otherwise misusing such information in any form.

- iii. Employees are strictly prohibited from disclosing such information to any unauthorized party, whether within or outside MDEC, unless expressly authorized by MDEC or legally required to do so or for the purpose of verification purposes by MDEC.

**g) Gifts, Hospitality and Entertainment**

- i. MDEC employees shall not directly or indirectly give, agree to give, promise or offer to any person, or accept, agree or promise to accept from any person, any gifts, hospitality, entertainment, or gratification, whether for the benefit of that person or another person with the intent to obtain or retain business for or with MDEC or to obtain or retain an advantage in the conduct of business or operation for or with MDEC.
- ii. MDEC adopts a strict policy on preventing the offering, giving and receiving of gifts, hospitality, and entertainment in respect of any monetary and non-monetary business dealings or transactions with MDEC regardless of the value at any time, on or off the work premises. However, MDEC recognizes the occasional acceptance or offer of gifts, hospitality and entertainment as acceptable subject to the provisions set out in the MDEC Gifts, Hospitality and Entertainment Policy, including the requirements to make declarations. Details on the declaration of gift, hospitality and entertainment as provided in the MDEC Gifts, Hospitality and Entertainment Policy.

**h) Participation in External Voluntary and Community Activities**

- i. MDEC encourages employees to participate in voluntary public service, recreational, sports, and other community activities outside of working hours. However, such participation shall not adversely affect the employee's performance or ability to fulfil their duties and responsibilities to MDEC.
- ii. Employees who are invited, appointed or elected to serve as officials of clubs or community organizations shall ensure that these external commitments are compatible with their full-time employment at MDEC. Employees are expected to manage their time effectively and discharge their duties and responsibilities to MDEC without compromising the best interest of the company.
- iii. Employees who wish to voluntarily serve on statutory or public bodies (as defined under the MACC Act) shall obtain prior written approval from the Head of Department/performance manager (whichever is applicable) and Head of HRA. In instances where participation in external activities requires time away from work during normal working hours, an approval for leave shall be obtained.
- iv. Head of Department/performance manager reserves the right to review and, if necessary, withdraw such approvals should the external activities

interfere with the employees' work performance or conflict with the interests of the company.

- 3.12.7 The employee shall immediately disclose, upon discovery or knowledge of any actual, potential, or perceived conflicts of interest as required under this Code and/or any other MDEC's policies, procedures, guidelines and/or requirements, or to disclose and declare as and when in doubt or as determined by MDEC. Such disclosure shall be made in writing to HRA and/or in the manner as prescribed by MDEC from time to time.

### **3.13 DUAL EMPLOYMENT**

- 3.13.1 Employees are prohibited from engaging in any form of dual employment, in whatever capacity during their period of employment with MDEC.
- 3.13.2 For the purpose of this Code, dual employment is where an employee holds a full-time position and payroll with one employer and takes on an additional employment with another employer either full-time or part-time.

### **3.14 GAINFUL ACTIVITY**

- 3.14.1 Employees may engage in gainful activities outside of the employees' full-time working hours with MDEC, provided that such activities do not conflict with the interests of MDEC or interfere with the employees' duties and responsibilities.
- 3.14.2 For the purpose of this clause, gainful activity may include any form of services, trade, or business from which the employees derive monetary compensation or other financial benefits.

### **3.15 ACT OF MISCONDUCT**

- 3.15.1 Misconduct means improper behavior or an act or conduct in relation to duties, responsibilities or work which is inconsistent with the due performance of obligations to MDEC and includes but is not limited to breach of discipline, violation of this Code or the rules and regulations as set out in any of MDEC's policies, procedures, guidelines and/or requirements.
- 3.15.2 Any misconduct may result in appropriate disciplinary action (including the termination, demotion and/or suspension) and if warranted, may also be subjected to legal proceeding, in accordance with MDEC's established policies and procedures.
- 3.15.3 The following constitute acts of misconduct subject to the requirements of applicable laws, rules and regulations:
- a) insubordination;
  - b) tardiness;
  - c) absenteeism;
  - d) violent behaviour or threats of violent behaviour (includes assaults and fighting, whether with employees, client, contractor, or visitor to MDEC's premises);
  - e) theft, fraud, misappropriation of MDEC's money/assets;

- f) being dishonest or conducting oneself in such a manner as to lay oneself open to suspicion of dishonesty;
- g) encouraging or assisting anyone to steal MDEC's assets;
- h) negligence, neglect or dereliction of duty;
- i) sleeping while on duty;
- j) deliberate damage to MDEC's property;
- k) leaving the workplace/approved working space during working hours without appropriate approval;
- l) sexual harassment/impropriety at the workplace/approved working space;
- m) drugs/substance misuse or alcohol consumption while performing duties and responsibilities to MDEC;
- n) smoking or using any tobacco products including electronic cigarettes or vaping devices within the non-designated smoking areas (if any) as identified by MDEC;
- o) signing in or signing out attendance for other employees;
- p) workplace/approved working space's bully and harassment;
- q) obstructing and causing nuisance to other employees from performing their duties and responsibilities;
- r) gambling (including but not limited to online gambling) within MDEC's premises;
- s) inaccurate recording of information/data;
- t) improper/unauthorized use of MDEC's assets/properties;
- u) non-observance of safety precautions or rules or interfering or tampering with any safety devices installed in or at MDEC's premises;
- v) an act or omission which creates a substantial or specific danger to the lives, health, or safety of MDEC's employees, the public or the environment;
- w) directly or indirectly engage in any illegal or unethical practices including give, agree to give, promise or offer to any person, or accept, agree or promise to accept from any person, any bribes or gratifications, whether for the benefits of that person or another person, to achieve any business or personal advantage for themselves or others, in any transaction with MDEC, that contravene with any applicable anti-bribery or anti-corruption laws;
- x) engaging in other employment whilst in the service of MDEC;
- y) misuse/unauthorised/inappropriate use of MDEC's telecommunications systems/channels (e.g., excessive accessing of non-work-related internet sites (such as social networking websites), accessing of pornographic sites/dark webs and deliberate tampering with or unauthorised use of computer hardware or software);
- z) use of unlicensed/illegal software on company computers/assets;
- aa) direct or indirectly taking retaliatory/discriminatory actions against persons in situations where they are protected by the MDEC Whistleblowing Policy;
- bb) any act/manner that can be reasonably construed as lacking in efficiency that may cause adverse effect to MDEC including image or reputation;
- cc) breaching any policies, prohibitions or requirements related to personal data protection including any related laws, regulations and/or standards;
- dd) breaching any policies or prohibitions set out within this Code and/or other approved MDEC's policies, procedures, guidelines and/or requirements;
- ee) taking measures in circumvent/manoeuvre/manipulate the policies and prohibitions set out in this Code and/or other approved MDEC's policies, procedures, guidelines and/or requirements;

- ff) failure to disclose any actual or potential conflict of interest as required by MDEC and/or any rules, regulations or requirements;
- gg) failing to observe all laws and regulations applicable to MDEC's business and operations;
- hh) criminal conviction at court;
- ii) condonation or failure to take action against any disciplinary issues or a misconduct;
- jj) falsify/tamper/alter any document in the course of employment or submission thereof;
- kk) attempt to conceal information or providing selective information in the course of employment or submission to the recommending and approving authorities;
- ll) attempt to conceal information relating to misconduct;
- mm) false/incomplete/concealment of declaration pre or during employment;
- nn) wilful withholding of information i.e. intentionally fails to disclose important information during an investigation by MDEC;
- oo) knowingly directing, forcing or advising other employee/person/entity to commit any of the above misconduct; or
- pp) initiating, organizing, participating in, or promoting any form of riot, strike, work stoppage, picketing, or any collective action against MDEC that disrupts MDEC's business operations and/or reputation.

3.15.4 The list of misconduct set out above is not intended to be exhaustive and shall include any omission. For the avoidance of doubt, the examples provided do not limit or detract from the broader definition of misconduct as may be prescribed under any applicable laws, regulations, or any other MDEC's policies, procedures, guidelines and/or requirements. MDEC reserves the right to take appropriate disciplinary action in relation to any conduct deemed inappropriate, unprofessional, or detrimental to its interests, even if such conduct is not specifically listed herein.

### **3.16 REPORTING OF VIOLATION**

- 3.16.1 Employees who encounter, suspect, have reasonable belief or become aware of any actual or potential violation of this Code/other approved MDEC's policies, procedures, guidelines and/or requirements are required to immediately report their concern(s) through MDEC's designated whistleblowing channel(s) and/or to HRA. The duty to report is mandatory and applies regardless of the employees' role, seniority, or involvement in the said matter.
- 3.16.2 Employees shall ensure that the reporting is made on a genuine disclosure and based on reasonable belief of violation. Employees who make false or malicious reports with the intent of harming/causing adverse effects on others shall be subject to disciplinary action in accordance with the applicable laws and MDEC's established policies and procedures.
- 3.16.3 Employees are strictly prohibited from retaliating or discriminating against:
  - a) any employee who genuinely and reasonably, reports a suspected violation; or
  - b) any employee who cooperates in an investigation.

MDEC will take appropriate action against any employee found to have threatened, harassed, intimidated, or otherwise taken adverse action against the whistleblower/complainant.

- 3.16.4 All reports of violation shall be handled in strict confidentiality to the extent practicable, consistent with the need to investigate and address the matter, in accordance with MDEC's policies, procedures, guidelines and/or requirements.
- 3.16.5 For avoidance of doubt, only concern(s) reported through designated MDEC's whistleblowing channel(s) is/are protected under the MDEC Whistleblowing Policy.

### **3.17 LIABILITY FOR LOSS OR DAMAGES**

- 3.17.1 In the event MDEC incurs any loss, damages, liability, or expense directly resulting from the employees' misconduct, negligence, careless action, or any act or omission undertaken without proper authorization, MDEC reserves the right to recover full restitution from the said employees through salary deductions or any other amounts payable by employees, subject to the applicable laws.
- 3.17.2 This includes, but is not limited to, the cost of replacement or repair of MDEC's property such as notebooks, computers, mobile phones, hardware, software, vehicles, or any other assets that are lost, damaged, or rendered unusable due to employees' negligence.
- 3.17.3 In addition to salary deductions, MDEC reserves the right to take further disciplinary or legal action as it deems appropriate.

### **3.18 TRAINING AND AWARENESS**

- 3.18.1 All employees of MDEC (including subsidiaries) shall be aware of the Code and its contents upon employment and/or throughout the duration of employment. The Code shall be made available on MDEC's official website and be accessible to all employees.
- 3.18.2 Employees are required to participate in all mandatory training programmes (if any) in relation to this Code, as determined by MDEC from time to time.

*\*\*\*End of Section 3 of MDEC Employee Handbook\*\*\**