



CODE OF CONDUCT

INTRODUCTION

We are committed to adopting best practices in corporate governance and observing high standards of behavior and integrity in our businesses and activities, including dealings with the authorities, stakeholders, communities, and environment in which the Ideal Reliance (“Company”) conducts its operations.

We have adopted this Code of Conduct (“Code”) to formalize and commit to ethical values and standards of conduct expected of our employees. Our Code gives guidance on how employees and other people affected by the Code should apply the core values to the Ideal Reliance’s businesses and activities. We are also committed to ensure the progressive implementation from time to time, of appropriate internal systems to support, promote and ensure compliance with this Code.

Each employee has a role to play in enabling the Company to achieve sustainable performance and to deliver value to our clients and stakeholders alike without compromising our ethical standards, values, and reputation, and in upholding and enforcing our Code. All employees are expected to conduct themselves professionally in their work and dealings and comply with the Code.

PURPOSE

Our Code sets out standards with which Ideal Reliance and our employees are required to comply with when dealing with each other, clients, stakeholders, and the broader community. Our Code is to be read and applied in conjunction with, where applicable, other Company policies, procedures, directives, and guidelines.

APPLICABILITY

All Ideal Reliance employees, whether they are in executive or non-executive positions, and regardless of their job grade or location.

REPORTING AND REVIEW

Employees are to report any breach of compliance with our Code.

The reporting of non-compliance with our Code may either be made to:

- the direct supervisor; or
- the line manager; or
- any Head of Department; or
- may be made in accordance with Whistleblower Protection Act 2010 which aims to:
 - a. encourage employees to feel confident in raising serious business or other associated concerns;
 - b. provide a formal channel for employees to raise these concerns and receive feedback on actions taken;
 - c. ensure that employees receive a response to their concerns and ensure that they are aware of how to pursue their concerns if they are not satisfied with the response given; and
 - d. reassure employees that they will be protected from possible reprisals or victimization if they have a reasonable belief that they have made any disclosure in good faith.

DISCIPLINE

The maintenance of discipline, good conduct and good behavior amongst employees is important in running the business and is for the common good of Ideal Reliance and our employees. The term “misconduct” means improper behavior, act or conduct in relation to duties or work which is inconsistent with the due performance of obligations to the Company and includes a breach of discipline or violation of our Code. Subject to the requirements of applicable law, disciplinary action may be taken against any person and employee to whom our Code applies for misconduct or for non-compliance.

All employees are required to: -

- observe conduct in the workplace based on Code of Ethics;
- uphold personal integrity and to adhere to the requirements of the law and to observe recognized standards of fair dealing;
- be dedicated and loyal to the Company;
- be responsible for conducting their work in a manner consistent with the Company’s latest directives, guidelines and policies;
- immediately bring any knowledge of possible breach or violation of the Code by reporting non-compliance. All matters so reported shall be treated and dealt with in complete confidentiality by the company.

CODE OF ETHICS

A. COMPANY POLICIES AND PROCEDURES

Employees shall strictly adhere to all policies and procedures set forth by the Company. Failure to do so may result in misconduct and the appropriate disciplinary and legal action(s) will be imposed.

B. CONFIDENTIAL INFORMATION

Given the nature of services that the Company offers to its business associates and clients, that is provision of recruitment, human resource and other related services, employees may come into possession of confidential or sensitive information, in particular, confidential and sensitive information relating to the Company, its business associates, clients, contractors and job applicant candidates (“Confidential Information”) during their course of employment. In line with the well-established Personal Data Protection Act 2010 (“PDPA”) by Malaysian government, all employees are prohibited from disclosing any confidential information unless authorized to do so by their related direct superiors or Confidential Information owners. It is therefore pertinent that all employees exercise caution and due care in handling any information obtained in the course of their duties.

C. PROPERTY, EQUIPMENT AND USE OF FACILITIES (“Assets”)

Employees shall not cause any damage to property, equipment and facilities whether belonging to the Company, our business associates, clients, or to other employees located within these such premises, or any use of any such Assets to commit any criminal acts or any act of misconduct. Assets belonging to the Company, our business associates and/or clients assigned to employees are strictly to be utilized for appropriate work-related purposes only. Abuse or misuse of these Assets so assigned is considered a serious violation of the Code that can result in severe disciplinary actions taken upon those found guilty of misconduct.

D. ANTI BRIBERY AND CORRUPTION

Any form of bribery and corruption is strictly prohibited. Employees must not provide, offer, or accept bribes, kickbacks, corrupt payments, facilitation payments, or inappropriate gifts, to Government Officials or any commercial person or entity, regardless of local practices or customs.

All employees must comply with all applicable anti-bribery laws and regulations, including, but not limited to, the Malaysian Anti-Corruption Commission Act (MACC Act) and Malaysian Companies Act.

The MACC Act covers the following conduct:

- the giving and accepting gratification;
- the giving or accepting gratification by an agent;
- corruptly procuring the withdrawal of a tender;
- bribery of an officer of a public body;
- bribery of foreign public officials;
- using an office or position for gratification; and
- dealing with, using, holding, receiving or concealing gratification or advantage in relation of any offence under the MACC Act.

The expression “gratification” under the MACC Act includes –

- money, donation, gift, loan, property, financial benefit or other similar advantage;
- any office, dignity, employment, contract of services;
- any payment, release or discharge of any loan, obligation or other liability;
- any discount, commission, rebate, bonus or percentage;
- any forbearance to demand any money or money's worth or valuable thing;
- any favor of any description, including protection from any penalty or proceedings
- of a disciplinary or criminal nature or forbearance from the exercise of any right,
- power or duty; and
- any offer or promise of any gratification within the meaning of any of the preceding items.

E. NO GIFT POLICY

We have adopted a “No Gift” policy whereby all employees are prohibited from, directly or indirectly, receiving or providing gifts, kickbacks, or gratuities from/to third parties. Employees, family members or agents acting for or on behalf of the Company are expected to refrain themselves from offering, giving, or receiving any gifts and any other form of benefits from person or entities where the gifts would reasonably be expected to influence the performance of employees’ duties in any aspect.

F. HUMAN RIGHTS AT WORK AND EQUAL OPPORTUNITY & WORKPLACE DIVERSITY

Ideal Reliance is committed to respecting and upholding the human rights of our workforce and those impacted by our operations and business relationships in the communities in which we operate. We recognize our responsibility to have a positive influence in society and that human rights are fundamental in contributing meaningfully and sustainably in everything that we do. Our approach to human rights is based upon the Federal Constitution of Malaysia Human Rights Commission of Malaysia (SUHAKAM) guiding principles on legislative, judicial, administrative and other measures aimed at prevention of human rights violations and abuses in place at the domestic level, both with regard to direct prevention (aiming to prevent violations from occurring by reducing the risk factors that cause violations) and indirect prevention (aimed at ensuring non-recurrence through investigation and addressing causes of violations as well as accountability). In addition to complying with applicable laws and regulations of the countries in which we operate, we focus our efforts on respecting and supporting the rights of our workforce and treating those who work for Ideal Reliance fairly, without discrimination, and in conditions that respect the rights and dignity of each individual. Ideal Reliance provides equal employment opportunity and anti-discrimination in the workplace. Our Company strives to ensure that employment opportunities properly reflect gender, ethnicity, and age of the Malaysian demographics. No employee shall practice any form of discrimination or prejudice in the workplace with respect to race, sex, national origin, color, religion, and age.

G. WORKPLACE SAFETY

All employees are expected to familiarize themselves and obey the Company’s safety rules. Unsafe conditions should be reported to a supervisor immediately. Disciplinary action, including termination of employment, may result from violating safety standards, creating dangerous situations, or failing to report or remedy such situations. A supervisor should be notified immediately in case of accident-related injuries, no matter how insignificant. In the event that employee is under secondment to the Company’s business associates or clients, the employee is expected to familiarize themselves with the good workplace, health, environmental and safety practices set out by the Company’s business associates or clients.

H. WORKPLACE HARASSMENT

Ideal Reliance is fully committed to a safe, healthy, and harassment-free work environment for all employees and believes that every employee should be treated with respect and dignity. This policy applies to all full-time, part-time, probationary, seconded or term employees. Harassment means any verbal, written or physical conduct that is known or ought reasonably to have been known to be unwelcome, inappropriate, or otherwise offensive to a person, and that such conduct demeans, humiliates, threatens him/her, or otherwise violates his/her dignity. Harassment has the purpose or effect of:

- creating an intimidating, hostile or offensive workplace;
- interfering with the performance of an employee's functions, duties and responsibilities; or
- affecting employment opportunities or compensation.

Although not exhaustive, the following conduct or behaviour would constitute harassment:

- insulting behaviour or comments (verbal or written);
- verbal, written or physical abuse, threats and assaults;
- derogatory remarks, slurs, epithets or language;
- unacceptable, annoying or unwanted nicknames or negative stereotyping;
- racist, pornographic or otherwise offensive signs, images, pictures or materials displayed;
- coercion, unwelcome demands, invitations or requests of a sexual nature;
- lewd, leering, obscene or suggestive gestures;
- unwanted or inappropriate physical contact that is non-consensual, such as kissing, pinching, stroking, fondling, patting, touching and brushing up against a person;
- derogatory or offensive pranks and practical jokes;
- isolation or exclusion of a person from others;
- bullying and victimization, for example, unreasonable and persistent criticism or humiliation, unreasonable distribution of work and responsibilities; and
- inappropriate inquiries or comments about a person's sex life, religious or cultural norms, sexual orientation, family background, source of income or lifestyle.

I. WHISTLEBLOW TO VIOLATION(S) OF THE CODE

Violation(s) of the Code affects the integrity of Company as well as the integrity of its employees. Not only does it lead to an unpleasant working environment, but it can also lead to serious legal and financial implications for Company. Company is dependent on all employees to report and not to condone any violation(s) of the Code.

ADDRESSING CONCERNS

Ideal Reliance's Code of Conduct is regularly reviewed and updated. If anyone believes that someone at or associated with Ideal Reliance is violating this policy or the law, they are asked to report it immediately to their manager, or Human Resources. We are committed to ensuring that everyone can raise concerns anonymously, freely, without fear of reprisal or intimidation, and that any complaints are dealt with fairly, thoroughly, confidentially and in a timely manner.

This policy will be reviewed periodically and updated as required.

Approved by

The Board of Directors

Agensi Pekerjaan Ideal Reliance Sdn Bhd

idealreliance.com