



MEDA INC
MEDA INC BERHAD
(Company No. 507785-P)

CODE OF ETHICS AND CONDUCT

1.1 WORK ATTIRE

Employees should be properly dressed during office hours. Jeans, t-shirts bearing advertisement and slogans and slippers are not allowed to be worn during official working days. For female employees, full veils (covering the face), culottes, shorts, 'hot pants' or revealing dresses are also not to be worn in the office. The following attire shall apply:-

- Male employee - shirts, tie and / or suit
- Female employee - blouse, skirt and /or suit formal trouser suit

The dress code on Saturday is smart casual. However, for employees who will be meeting an external party on a Saturday, the standard business attire shall apply.

1.2 UNIFORM

Employees who are required to be in their uniform and / or who are provided with safety gear e.g. helmet, shoes, etc. shall wear them during working hours.

All items provided by the company to the employee which is subsequently damaged due to normal wear and tear shall be replaced. However, damages due to the employee's misuse shall be repaired or replaced by the company at the employee's own expenses.

1.3 EMPLOYEE IDENTIFICATION

Every employee will be issued with an Employee Identification Tag. The tag must be worn during office hours and visiting other subsidiaries.

The tag should not be worn by others and should employee lose the tag; the employee is to report the loss to the Human Resource Department immediately.

A penalty payment of RM30.00 for any misuse / loss of the tag shall be imposed.

1.4 SAFETY AND SECURITY

Safety is every employee's responsibility and the continued co-operation of all employees is essential for the safe operations of the company. Every employee has an important role in accident prevention and is expected to co-operate fully in the measures taken for the protection of personnel and property.

It is also the employee's responsibility before leaving the place of work to switch off all electrical and electronic equipment entrusted to him.

The office will be locked at the end of each working day and it will be the responsibility of the last person to leave to ensure that all lights, air-conditioning unit and electronic equipment are switched off.

All employees shall abide by the company's fire and safety regulations. Any employee who fails to comply with the regulations will be subject to disciplinary action.

1.5 SMOKING WITHIN OFFICE PREMISES

Smoking within office premises, washrooms etc are strictly prohibited. Smoking is only allowed at designated smoking areas such as the open compound or the staircase areas. Smokers are required to keep the designated smoking areas clean.

1.6 CONFIDENTIALITY

Employees are at all times required to maintain confidentiality regarding all matters concerning the affairs, interests or transactions of the company and should not divulge or make public statements regarding such matter or information to any person except as required by duties or unless are authorized to do so by the company.

1.7 UNAUTHORISED SOLICITATIONS

Employees are not allowed to sell, expose for sale or solicit customers on the company's premises unless duly approved by the company. This includes soliciting or collecting contribution for any purpose without authorization provided prior approval is obtained from the respective Head of Department.

1.8 TELEPHONE CALLS, ELECTRONIC AND INTERNET USAGE

The use of company telephones, fax, copier, email and internet facilities are strictly for official business purposes. Any unlawful and/ or unauthorized use of such facilities is strictly prohibited and shall subject to disciplinary action.

1.9 CONFLICT OF INTEREST

An employee must not, without the prior consent of the company, place himself in a position in which there is a conflict between his duties and his personal interests, or, between those duties and any duties he owns to any other person.

An employee may not enter into any transaction with any party without the prior consent of the company after full and frank disclosure by the employee. This is irrespective whether the transaction is fair or otherwise. Employee is under duty to disclose his financial interest to the Group. Failing to do so shall subject the employee to disciplinary action including summary dismissal.

This principle is enunciated further as follows :

a) Contractual Dealing With Employees

The employee or his family shall not, directly or indirectly buy, sell or lease property, equipment or materials or enter into any other contractual arrangements (other than employment contracts) from or to the company, subsidiaries, associate companies and/or individual who is or is seeking to become a contractor, supplier or customer of the company, except with prior consent of the company.

b) Financial Interest In Suppliers and Customers

An employee shall not have any financial interest or own, directly or indirectly, through relatives, share or other forms of beneficial interest in company, subsidiaries, associate companies which :

- Supply materials, equipment, property and/ or services or have other business dealing with the company, subsidiaries and/ or associate companies
- Are customers of the company, subsidiaries and/ or associate companies

c) Family Interest

An employee whose family has interests, whether this be in the form of directorship, partnership, shareholdings or through agencies, in entities, which are on the company's list of authorized contractors or suppliers or which have contractual or supply arrangement with the company and who is involved in any decisions regarding or dealings, directly or indirectly, with entities in the course of his duties with the company, shall disclose his financial interest to the company prior to entering into any transaction with the entity.

1.10 DISCIPLINARY ACTION

All employees are required to observe rules and regulations of the company. Any employee who commits breach of rules or any other acts of misconduct, indiscipline or inefficiency or negligence of duty that directly or indirectly affect the company shall subject to disciplinary action.

The following list of misconduct is not exhaustive and is subject to change, re-interpretation or addition as and when management deems just and fit.

- Non adherence with Company's rules and regulations
- Theft, fraud or dishonesty including attempted theft, attempted fraud or attempted dishonesty
- Wilful refusal, insubordination or disobedience of any lawful and reasonable instruction
- Instigating fellow employees to work against the interests of the company
- Violence, riotous, disorderly behaviour, fighting, assaulting or threatening to assault
- Reckless negligence
- Substantial negligence of duties
- Wilful damage to or loss of company's goods or property
- Taking or giving bribe or any illegal gratification
- Gambling within company premises
- Persistent absenteeism
- Habitual late attendance
- Leaving workplace repeatedly during working hours without permission
- Illegal strike or inciting others to strike illegally in contravention of the provisions of any law or rule having the force of law
- Any material mis-statement or false representation made to the company
- Committing immoral act within the company premises
- Falsifying / altering / deleting records of any nature
- Swiping of other employee's punch card / attendance records

- Conflict of interest
- Misconduct via electronic media e.g. pornography, spamming
- Unauthorized disclosure of confidential information
- Possession of weapons or drugs
- Dishonesty / stealing and / or damaging company properties
- Intoxication
- Sleeping during company working house
- Becoming involved in serious financial difficulties / bankruptcy
- Conviction of imprisonment for any criminal offence
- Pecuniary embarrassment
- Sexual Harassment

The company may after due inquire, impose any one or a combination of the following disciplinary actions:

- Verbal warning
- Written warning
- Deferral of annual increment
- Suspension without pay for a specified period
- Demotion / Down-grading
- Dismissal after due notice

1.11 ABSENCE WITHOUT LEAVE

Any employee who is absent from work for more than two (2) consecutive working days without prior approval from his / her superior and / or without reasonable excuse, the employee shall be deemed to have abandoned his contract of service and may be dismissed.

1.12 FALSE INFORMATION

Should the company found the reasonable accuracy and with reasonable proff and evidence, that any personal information provided by the employee is false or misleading or the employee was involved in any crime or drug abuse undeclared prior to joining the company or at any time during the course of employment which effect the terms of employment, the Company reserves the right to terminate the employment forthwith without notice after due inquiry.

1.13 GRIEVENCE PROCEDURE

Recognising the value and the importance of full discussion in clearing up misunderstandings and preserving harmonious employer-employee relationship, every possible effort must be made, both by the company and the employee, to dispose of and settle any complaint, grievance or inquire as equitable and quickly as possible. Aggrieved employee may adopt the following procedures:

- 1) Any employee alleging that he has a grievance or complaint must immediately lodge it, in writing to his immediate superior within three (3) working days.
- 2) If, within three (3) working days, the grievance or complaint has not been resolved, it will be referred to the Department / Section Head.
- 3) If the aggrieved employee is dissatisfied with the decision of the Department / Section Head, the matter will be referred to the Human Resource Manager within three (3) working days.
- 4) If no agreement is reached, it will be referred to the Chief Executive Officer / Head of Subsidiary within four (4) working days.
- 5) If this fails, the matter may be referred within seven (7) days to the Industrial Relation Department of Human Resource for conciliation.