ACCURATIV (M) SDN BHD

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CODE OF CONDUCT

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INTRODUCTION

The development and succeed of our business based on the full trust and confidence we obtain from all stakeholders including our employees, customers, suppliers and etc.

With this, we have Employee Code of Conduct as a guide for Company's expectations. The employees shall regard this Code of Conduct seriously and comply to it while carrying out the duty.

1. Freely Chosen Employment

   Our company is committed not to use forced, bonded, or any form of prison labour. If foreign workers are recruited, there shall be no recruitment fee incurs to the workers. Workers are not required to lodge any deposit to work in our company. We do not keep any original identity documents of workers to work in our company. Termination notice is in compliance to Malaysian Labour Law.

2. Freedom of Association

   Our company respects the right of workers to join or form trade union and bargain collectively. We adopt open attitude towards any activity of workers representative or trade union. Workers' representative or union's representative is not discriminated when they carry out their works in the company. We support and facilities the election of worker representative and forming worker committee. Worker representative is to provide access to the management to discuss worker issue and welfare.

3. Safety and Health Policy – ISO 45001

   Our commitment to safety & health is addressed in our Safety & Health Policy that complying with ISO 45001.

4. No Child Labour

Our company is committed not to recruit child labour that is under the age of fifteen (15). We are committed not to recruit young workers under the age of eighteen (18).

Human Resource Department is responsible to implement this policy of not recruiting child and young labour. Our company extended this code of conduct to our supplier and contractor to ensure the protection of child and young person.

5. Living Wages Policy

Our company ensure wages and benefits paid to workers is complying with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Deductions from wages as a disciplinary measure or any unlawful deductions shall not be permitted or practiced.

Any deduction shall be explained and with a written consent by employee. All employees shall be provided with understandable written wages and related information in employment contract. All wages, benefits and deduction made shall be provided with written information, that is the payslip.

6. Working Hours Policy

Our working hours is complying with national labour laws and industry code of conduct, whichever affords greater protection. Workers shall not on a regular basis be required to work more than standard working hours of eight (8) hours per day or forty five (45) hours per week and all employee is provided with at least one day off for every seven (7) days period on average and overtime shall be voluntary and shall always be compensated at a premium rate as per our national labour law.

7. No Discrimination

Equal Employment Opportunity & Non-Discrimination

Our Company is committed to providing equal employment opportunity and non-discrimination for all employees and applicants without regards to race, religion, gender, age, marital status, disability, personal appearance, family responsibilities, political affiliation and etc. It is evaluated on the basis of personal skill, knowledge, experience and the suitability to the job.

Human Resource Department shall responsible to advise Department Head on equal employment opportunity applies to all aspects of employment, including recruitment, job tasks, working conditions, scheduling, benefits, wage and salary administration, promotions, disciplinary action, termination, and so on.

8. Regular Employment

We respect the recognised employment relationship. All employment condition shall comply with national law and practise. We provide regular employment (full time employment) to all workers, we fulfil our obligation to employees under labour and social security laws.

Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed–term contracts of employment.

9. Harsh or Inhumane Treatment

Anti-Harassment

The Company is committed to providing a work environment that is free of discrimination and unlawful harassment. Actions, words, jokes or comments based on an individual's gender, race, ethnicity, age, religion, or any other legally protected characteristic will not be tolerated. Such harassment is including Sexual Harassment. Sexual harassment defined as "any unwanted conduct of a sexual nature, whether verbal, non-verbal, visual, gestural or physical, directed at a person which is offensive, humiliating or a threat to their well-being". A procedure of handling sexual harassment is established for effective handling sexual harassment.

Suggestions

Suggestion is a form of employees' opinion for the improvement of working conditions, working procedures, welfare or any other positive feedback for continuation improvement.

Our company encourages open communication and welcome the employees to give suggestions. Any suggestions can send the email to suggestion@accurativ.com.

Other than email, there is a suggestion box is available in the office area. Human Resource Department is responsible for the suggestion email and suggestion box. Any suggestions received shall be validated by Human Resource Department before submit to Management for discussion and decision.

Grievance and Complaint Procedure

Grievance and complaint are the forms of negative feedbacks or dissatisfaction by employees in regards to working conditions.

The following is the step-by-step grievance procedure:

Step 1 Notification to Superior

The employee will write a letter to inform his / her immediate supervisor of the details of the rising problem within three (3) working days. Meet up with superior to discuss the issue. A rising or explanation must be given by the superior within three (3) working days.

For those who needs help in the written letter may approach Human Resource Department or workers representative on behalf of employee with employee's signature.

Step 2 Notification to Head of Department

If the supervisor's reply is not forthcoming or unsatisfactory, the employee may take his / her grievance to the Department Head who should give a reply within three (3) working days.

Step 3 Notification to Human Resource

In any event that the reply of supervisor or the Head of Department reply is not forthcoming or unsatisfactory, the employee can bring this matter to Human Resource Department to seek assistance. Human Resource Department shall response within three (3) working days to understand the whole situation and start the investigation.

Workers can also seek assistance of workers representative to discuss such grievance or complaints with Human Resource personnel.

This action shall be resolved within thirty (30) days upon the notification to Human Resource Department.

The investigation shall include inquiry gather information and evidence, identify the witness(es). The Company shall take the appropriate action based on the results of the inquiry and investigation.

The grievance shall forward to Human Resource Department at E-mail: hrm@accurativ.com

10. Environment Policy – ISO 14001

Our commitment to environmental protection is addressed in our environmental Policy that complying with ISO 14001.

11. Business Ethical & Whistle Blowing

Compliance with law

Accurativ shall conduct our business ethically without bribery, corruption or any type of fraudulent business practice. We are committed to meet the requirement of local and national law in relations to bribery, corruption and any type of fraudulent practice.

All employees must protect our company's legality by compliance to all legislation and laws. Employees are expected to be ethical and responsible when dealing with our company's finances, products, partnerships, branding and public image.

Anti-Corruption

The Company prohibits briberies for the benefit of any external or internal party.

In offering and accepting business gift, this must not have any preference or personal relations as this is for business rapport building and not for the purpose of influence the business decision or lead to bribery.

The employees shall not accept or attempt to request gifts or entertainment from any of business partners. Special personal favours at the expense of the business partner outside the scope of the Company business are not permitted.

The Company will not condone any of our employees asking or receiving bribes in cash or in kind from any party. Such act will be dealt with in accordance with the provisions of the law.

External Communication

External communication is a platform established by the Company for stakeholders to give feedback.

The feedbacks can be suggestions or stakeholders' feedbacks related to our code of conducts and social compliance.

Our company encourages open communication and welcome the public to give feedbacks. Any feedback can send the email to feedback@accurativ.com

Our company's general information is accessible by the public at the corporate website:

https://www.accurativ.com

Whistle-blowing Protection

Whistle-blowing is an act of voluntary reporting by the stakeholder or employee to the Management of any suspected wrong doing, illegal acts or acts in violation of rules and regulations committed by another employee.

The Company encourages employees to voice the concern and at the same time the employees shall be well protected after making such report. This to promote responsible and secure whistleblowing protection without fear of undesirable consequences.

Any information related to whistle-blowing received shall be channel to Managing Director for validation before submit to Board of Director for discussion and decision.

Mechanism established for whistle-blowing is email address whistleblowing@accurativ.com. Stakeholder or employee may report any misconduct detected via this whistle-blowing email address. Our company shall validate the confidential report of any misconduct prior to take further action.