



# WTEC GROUP BERHAD

## CODE OF CONDUCT AND ETHICS

### Introduction

**WTEC GROUP BERHAD.** has a statutory obligation to be a good employer and we personally recognise the importance of treating staff fairly and properly in all aspects of employment.

In return, the company expects a high standard of behaviour from you. All staff is expected to identify with and have a commitment to the philosophy and values of **WTEC GROUP BERHAD**, and to demonstrate that commitment in the performance of their duties.

Please make yourself fully familiar with the standards in this document.

A handwritten signature in black ink, appearing to be 'A. S.', written over a horizontal line.

Managing Director

### WTEC GROUP BERHAD

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## **Purpose of the Code**

The purpose of this Code of Conduct is to assist you to know and understand the minimum standards of conduct and behaviour expected of you as an employee of **WTEC GROUP BERHAD**

This reflects the basic requirements of professionalism, integrity and courtesy needed to ensure that we provide a quality education to our workers, and that a pleasant and safe working environment exists for all staff and workers.

## **Coverage**

The Code applies to all employees of **WTEC GROUP BERHAD** including permanent, temporary, and casual employees. This Code forms part of your employment with the company.

## **Principles**

The Code of Conduct establishes three principles of conduct which all staff are expected to observe:

- 1) You should fulfil your lawful obligations to **WTEC GROUP BERHAD** with professionalism and integrity.
- 2) You should perform your official duties honestly, faithfully and efficiently, respecting the rights of the company community and your colleagues.
- 3) You should not bring your employer into disrepute through your activities, whether inside or outside company. Activities outside the company are not likely to be acceptable if they:
  - damage the standing or reputation of **WTEC GROUP BERHAD** because of the position you hold in it;
  - interfere with the proper performance of your duties.

## **Shared Expectations**

**WTEC GROUP BERHAD** can operate effectively and provide a quality outcome when there is a shared expectation between the company (as the employer) and its employees. This is a two-way commitment that benefits both the employer and employee when expectations are met.

Set out below is a summary of the expectations that **WTEC GROUP BERHAD**, as the employer, has of you, and the expectations that you, as an employee, may have of **WTEC GROUP BERHAD**.



### **Expectations of Staff**

**WTEC GROUP BERHAD** expects you to:

- work within the law with honesty and integrity;
- comply with all lawful and reasonable instructions;
- comply with the policies of the **WTEC GROUP BERHAD**;
- work diligently and meet the requirements of your employment agreement;
- respect the rights of colleagues, workers and the company community.

### **Obligations of WTEC GROUP BERHAD to Staff**

As a good employer, we are committed to meeting the following staff expectations:

- a commitment to the spirit and principles of the existing Labour Law;
- opportunities for equal employment, including recognition of:
  - the employment needs ethnic or minority groups, women, and people with disabilities;
- impartial and open selection and appointment procedures;
- fair rates of remuneration for skill, responsibilities and performance;
- an up-to-date job description that provides clear statements of your duties and your employer's expectations of you;
- adequate training and equipment to perform your duties;
- regular and appropriate feedback and communication on your work performance;
- effective communication of information;
- good and safe working conditions;
- opportunity for the enhancement of your abilities;
- freedom from harassment or discrimination in the workplace;
- a commitment to a supportive and confidential Employee Assistance Programme;
- appropriate disciplinary and dispute procedures and the opportunity for redress against unfair or unreasonable treatment by the employer.



## **Codes of Behaviour**

If you have any prior criminal convictions, you are required to inform **WTEC GROUP BERHAD** about them before accepting employment with the company. If you do not disclose this information or are not truthful about it, disciplinary action could be taken against you which could lead to dismissal.

You are to avoid any activity, either work-related or private, which could reflect badly on **WTEC GROUP BERHAD** in its relationships with the company community. This means that you are to inform your manager in writing if:

- you apply for bankruptcy or become bankrupt;
- any criminal charges or convictions that may occur while you are employed by **WTEC GROUP BERHAD** are of such a nature that it would be inappropriate for you to continue to be employed in the same capacity by the company. This may include, for example, charges that involve loss of trust between you and the company, or charges that damage the reputation of the company;
- secondary employment – permission from employer – doesn't interfere with primary duties.

## **Performance of Duties**

Employees are expected to carry out their duties in an efficient and competent manner.

This means that you are expected to:

- comply with the law;
- comply with all lawful and reasonable instructions and work as directed by your employer or their duly delegated representative;
- perform your duties according to the legislation, policies and procedures of **WTEC GROUP BERHAD**;
- comply with any other code of ethics or practice that may apply to your profession
- perform your work to an agreed standard;
- show proper and reasonable care when using company property, resources or funds;
- contact your employer (within 30 minutes of your normal starting) if you are to be absent from work due to sickness or an emergency.

You are also expected to obtain permission from your employer to:

- be absent from your workplace during work hours;
- Enter into any contract or agreement on behalf of **WTEC GROUP BERHAD**. The company will not accept responsibility for any unauthorised action.



### **Unacceptable Behaviour**

Failure to observe these standards of conduct by a staff member may result in disciplinary action, which could include termination of employment.

Examples of behaviour that would be considered unacceptable by the company include:

- ignoring lawful and reasonable instructions from your employer;
- being under the influence of alcohol, drugs or solvents impeding your performance during working hours;
- giving false information (eg: stating you have a driver's licence when you don't; making a false claim for expenses);
- failing to declare information that is requested when you apply for employment with **WTEC GROUP BERHAD** (eg: having a revoked driver's licence or a criminal conviction);

### **Respect for the Rights of Others**

While you are employed by **WTEC GROUP BERHAD** you have a duty to treat your colleagues, management staff, supplier and the customer with courtesy and respect. This means that you are expected to:

- Avoid behaviour that might distress other employees or disrupt the workplace.
- Ensure that any workplace relationships do not have a negative effect on your work performance.
- Respect the privacy of individuals when dealing with personal information.
- Be non-judgemental by not harassing or discriminating against your colleagues on the basis of their gender, age, disability, marital status, and ethnicity, religious or ethical beliefs or sexual orientation.
- You must not have or bring into the workplace any material that may be viewed as racist or sexist, that is pornographic, or that is otherwise offensive to the company or its staff.

### **Unacceptable Behaviour**

Failure to observe these standards of conduct by a staff member may result in disciplinary action, which could include termination of employment.

Examples of behaviour that would be considered unacceptable by the company include:

- the use of abusive, obscene or threatening language or behaviour to your colleagues or the public;
- misuse, abuse or improper use of your position or of any statutory authorities or powers that may be delegated to you.



## Conflicts of Interest and Integrity

You are expected to be honest, fair and impartial when you perform your duties. This means that:

- You should not show bias to an individual worker. Everyone should be treated fairly.
- In general, you are not to approve anything that will result in expenditure in respect of yourself (eg: increased salary, travel expenses, a training course, your own overtime).
- You are not to lend money to, or borrow money, or otherwise enter financial relationships with staff or workers. The amount of money lent or borrowed could imply indebtedness that could lead to a conflict of interest in formal work relationships.
- You must inform **WTEC GROUP BERHAD** if you are involved in, or have a personal or financial interest or commitment to, any activity that may conflict, or could be seen by others to conflict, with the performance of your duties and the goals of the company.

This includes situations such as:

- having a close family member, relation or partner working with you;
- when a member of your family or a person that you know enters into a professional relationship with the company. Under no circumstances are you to become professionally involved, or in any way try to influence that relationship, or obstruct staff in performing their duties.

A financial interest or commitment includes:

- company directorships;
- shareholdings;
- offers of additional employment outside the company.
- You must inform **WTEC GROUP BERHAD** if you are a member of (or plan to become a member of) or have a family involvement in a trust or community organisation which is funded by or otherwise linked to the company.
- Some employees, such as executives, engineers, are required to abide by a professional code of ethics. These employees must inform **WTEC GROUP BERHAD** if there are any conflicts between their professional codes of ethics and the duties they are directed to perform.
- You should consult with your employer before taking up other paid employment where that other paid employment could conflict with the performance of your duties at **WTEC GROUP BERHAD**.

You should speak to your employer if you are unsure whether or not a particular situation is, or could be seen to be, a conflict of interest.



## **Gifts and Rewards**

You may not seek any form of reward (including gifts, favours, prizes or fees) for performing your duties as an employee. Gifts or rewards can be seen as bribes or inducements that put you under an obligation to someone other than **WTEC GROUP BERHAD**. While it is acceptable to receive a gift of a low value, if you are offered any form of reward or gift valued at RM50.00 or more, you should inform your employer who will decide the appropriate response.

## **Participation in public bodies or voluntary associations**

You must inform your employer if you are participating in a public or voluntary organisation (or intend to) and there are actual or potential conflicts between your responsibilities and duties as a staff member of **WTEC GROUP BERHAD**, and your responsibilities and duties to the other organisation. Where it is considered there is a potential conflict of interest, appropriate arrangements will need to be made to avoid or resolve the conflict.

For example:

- It could be interpreted as a conflict of interest if you are a member of (or plan to become a member of) or have a family involvement in a trust or community organisation which is funded by or otherwise linked to **WTEC GROUP BERHAD**.

## **Unacceptable Behaviour**

Failure to observe these standards of conduct by a staff member may result in disciplinary action, which could include termination of employment.

Examples of behaviour that would be considered unacceptable by the **WTEC GROUP BERHAD** include:

- approving expenditure for yourself, a family member, or a business that you have an interest in;
- failing to declare activities that you are involved in that could be seen to be in conflict with your work;
- soliciting, and/or accepting gifts or rewards, or using company services/resources for personal advantage or gain;
- failing to disclose a personal relationship with a worker or their family when you have a professional relationship with that person.



## **Security/Confidentiality**

You are expected to maintain the highest standards of confidentiality and security in the workplace.

This means that you are not to:

- use the company's computer systems in any way that may corrupt or disrupt their normal function;
- access, or attempt to access, machines or networks by unauthorised means – for example unauthorised use of dial-in modems;
- use information related to the company's systems for anything other than authorised purposes;
- bring into the workplace via the email or Internet system, or by any other means, any material that is pornographic, or that may be viewed as racist or sexist;
- give your computer password/security card to any other members of staff without good and justifiable reason;
- leave a record of your password anywhere obvious so that someone else may see it.

## **Ownership of Information**

**WTEC GROUP BERHAD** owns all data stored on computer systems. Management has the right to access and view this information at any time.

The network is being continually monitored and staff found using the system inappropriately may face disciplinary action.

## **Data Storage on Computer Systems and Servers**

Only business information can be stored on computer systems. You are not permitted to store any personal data on the computer system, including documents, spreadsheets, databases, games and jokes.

## **Computer Software**

Only software authorised by the company can be loaded onto **WTEC GROUP BERHAD** computer systems. Any software loaded onto any **WTEC GROUP BERHAD** equipment must have a valid licence with proof of ownership. No software owned by the company may be copied and used on another PC or taken home and loaded onto a personal device, as this contravenes software licensing laws.

## **Use of the Email System**

The email system is for company purposes and must not be misused. While it is acceptable to send or receive business messages from outside the company, users should be aware that this information might not be secure outside the company. This needs to be considered before you send email. Personal information, such as documents, spreadsheets, databases, games, jokes and other non-business-specific email must not be circulated via the email system.



### **Internet**

Use of the Internet is for company purposes only. You are not to retrieve, distribute or store unapproved or non-business-related material from the Internet. You must have approved access and this is provided on an individual basis.

### **Retention of Data**

**WTEC GROUP BERHAD** is required to retain information in accordance with the Customer and Government legal requirements. This means that you cannot delete business-critical data from the computer system without permission.

### **Unacceptable Behaviour**

Failure to observe these standards of conduct by a staff member may result in disciplinary action, which could include termination of employment.

Examples of behaviour that would be considered unacceptable by the company include:

- misuse, abuse or unauthorised use of company funds, resources or property (including telephones, fax machines, Internet, email, photocopiers, computers, credit cards, taxi cards and vehicles);
- falsifying company records (eg: inaccurate or false recording of your time sheet).

### **Official Information**

The disclosure or release of official information to supplier, customer and other interested party is subject to the approval of **WTEC GROUP BERHAD**'s management.

Official information must only be released by authorised employees. It is not to be released to the media or the public without the proper authorisation. For example, staff may not remove or copy company documents or records for external use without approval from their manager.

It should never be used for personal motives.

### **Unacceptable Behaviour**

Failure to observe these standards of conduct by a staff member may result in disciplinary action, which could include termination of employment.

Examples of behaviour that would be considered unacceptable by **WTEC GROUP BERHAD** include:

- providing information outside **WTEC GROUP BERHAD** without proper authority;
- using company information for unauthorised purposes;
- using company information to support personal motives;
- breaching the Privacy Act in respect of employees, suppliers or users of company services.

## **Public Comment**

Staff members should not respond to requests from the media for comment on matters relating to the company. Only authorised staff members should respond to media requests for comment on such matters. If the media makes an approach to you, inform your principal/company so they can respond to the media request.

## **Unacceptable behaviour**

Failure to observe these standards of conduct by a staff member may result in disciplinary action, which could include termination of employment.

Examples of behaviour that would be considered unacceptable by the company include:

- publicly commenting on matters relating to management/employees;
- giving the impression that you are expressing the views of WTEC GROUP BERHAD when you are actually stating your own personal views;
- making a personal attack on a fellow staff member.

## **Breaches of the Code of Conduct**

This Code of Conduct describes the standards of behaviour expected of staff. As outlined in the Code, behaviour or actions that are considered unacceptable **by WTEC GROUP BERHAD** may result in disciplinary action against the employee concerned, which could include termination of employment.

## **Disciplinary Action**

Disciplinary action is about problem solving. **WTEC GROUP BERHAD** is concerned to identify problems associated with performance or behaviour, and to make sure that the process for fixing those problems is prompt, consistent and fair. In general, disciplinary procedures include informal or formal disciplinary action along the following lines:

### **1. Informal Disciplinary Action:**

- discussion of the problem;
- assistance to help overcome the problem;
- referral to the Employee Assistance Programme, if appropriate;
- temporary transfer to other duties.

### **2. Formal Disciplinary Action:**

- oral warning;
- written warning;
- removal of discretionary conditions of employment (ie: delegations, flexible working hours, etc.);
- transfer to another position at existing salary;



- transfer to another position with reduced pay (but not below the minimum rate for that position);
- suspension (with or without pay);
- dismissal with notice;
- dismissal without notice.

Other options may be considered, depending on the circumstances of the case.

### **Acknowledgement of Receipt of Code of Conduct**

Whether disciplinary action is informal or formal, the **WTEC GROUP BERHAD** will make sure that the disciplinary procedures are fair. This means that:

- (a) You must be told of your right to request union, legal or other assistance and/or representation.
- (b) You must be told of the specific behaviour or performance that is causing concern, and given a reasonable opportunity to provide an explanation.
- (c) You must be told, where appropriate, of the action that is required to amend or improve your behaviour or performance, and be given a reasonable opportunity to do so.
- (d) We must undertake an appropriate investigation before any substantive disciplinary action is taken.
- (e) If the offence is sufficiently serious, an employee is to be placed on suspension pending investigation.
- (f) An oral warning would usually precede a written warning, depending on the seriousness of the misconduct.
- (g) It is a requirement that the process and result of any disciplinary action are recorded in writing, read and signed by you (the employee), and then placed on your personal file.

In general terms, no disciplinary papers will go on your file unless you have seen them or have been given a genuine opportunity to see them. If you are not satisfied with the disciplinary action taken, you have the right to pursue a personal grievance. This procedure is outlined in your employment agreement.