

# VIEWQWEST

## CODE OF BUSINESS CONDUCT

**Issuing department** : Group Compliance  
**Target audience** : All Employees and Stakeholders;  
Approver Board of Directors of ViewQwest Group  
**Repository** : <http://www.viewqwest.com.my/Policies>  
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## 1. INTRODUCTION

Since its founding, ViewQwest's business practices have been governed by integrity, honesty, fair dealing and full compliance with all applicable laws. ViewQwest Employees have upheld and lived this commitment in their everyday responsibilities ever since, and ViewQwest's reputation remains one of the Company's most important assets today. The ViewQwest Code of Business Conduct (hereinafter referred to as "Code") prescribe certain values and principles which ViewQwest<sup>1</sup> has committed. This Code specifies and helps to establish certain non-negotiable minimum standards of behaviour in key areas.

To sustain good corporate governance, ViewQwest has formulated and adopted a code of ethics and conduct symbiotically with the Core Values of Trust, Excellence, Ownership and Teamwork. The nature of this Code is not meant to cover all possible situations that may occur. It is designed to provide a frame of reference against which to measure any activities.

Employees should seek guidance when they are in doubt about the proper course of action in a given situation, as it is the ultimate responsibility of each employee to "do the right thing", a responsibility that cannot be delegated. Employees should always be guided by the following basic principles:

- (a) Avoid any conduct that could damage or risk ViewQwest or its reputation;
- (b) Act legally and honestly;
- (c) Put ViewQwest's interests ahead of personal or other interests.

For the purposes of this Code, references to "Employees" include employees (whether full-time, part-time, contract, or temporary), associates, management, officers and directors of ViewQwest Group and its subsidiaries.

## 2. OBJECTIVE

The objective of this Code is formulated with the intention to achieve the following:-

- i. Serve as commitment to do business in a manner that is efficient, effective and fair;
- ii. Practice high standard of honesty, integrity, ethical and law-abiding behaviour.
- iii. Provide guidance on the way all Employees conduct themselves in dealing with parties doing business with ViewQwest; and
- iv. Provide the manner in which all Employees should conduct themselves at or outside their workplace while performing daily duties for ViewQwest.

## 3. CORE VALUES

TRUST	-	We act with integrity and we have each other's back.
OWNERSHIP	-	We are responsible for taking action & driving best results for our customers and our business
TEAMWORK	-	We can achieve so much more working together
EXCELLENCE	-	We are good, but we can always be better – a better service provider, a better employer, a better teammate

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<sup>1</sup> ViewQwest means and includes ViewQwest Holdings Sdn. Bhd., its holding, subsidiary, and related companies, including ViewQwest Management Sdn. Bhd., ViewQwest Sdn. Bhd., and ViewQwest Digital Sdn. Bhd.

## **4. RESPONSIBILITY**

ViewQwest focus on the uncompromising in commitment to integrity. This forms the foundation to conduct business and to treat others, internally and externally. ViewQwest promotes clear communication, respectfully, and professionally in business; treating Employees, customers, independent contractors, consultants, suppliers, partners, distributors, and others fairly.

For the benefit of each other in the Group, Employees must adhere to the expectations set forth in this Code and all other applicable policies and procedures regarding ViewQwest-related activities.

Employees are expected to understand and comply with the Code, ensure the subordinates understand and comply with the Code, portray and exercise good ethical values, aware with the changes or amendment of the Code, be accountable for behaviours of the subordinates in failing to comply with the Codes and other applicable policies, procedures, guidelines, directives, rules and practices of the Company.

Adherence of the Core Values and principles is important to guide every interaction and every decision making. One must not only understand these Core Values and principles, but also must adopt and demonstrate the values through the integrity and professionalism that we bring to our global work.

Employees should also agree and declare compliance to the Code upon appointment to or joining ViewQwest which is to be read together with the terms and conditions of their employment agreement. Employees may be subjected to disciplinary actions including but not limited to withholding of increments and merit award, denial of promotion and termination or dismissal of employment for violating the Code.

We also expect our Business Partners to understand and comply with the relevant aspects of the Code. Violation of the Code may result in blacklisting or termination of their contract by ViewQwest.

Should there be other policies and procedures of ViewQwest that are in conflict with this Code, the policies as covered in this Code shall prevail over the others.

## **5. PRINCIPLES**

### **COMPLIANCE WITH LAWS, RULES AND REGULATIONS**

ViewQwest and its Employees are bound by the applicable laws. Compliance with all applicable laws and regulations must never be compromised. All Employees shall always observe and ensure compliance will all applicable laws, rules and regulations in the performance of their duties. This also includes the ethical and technical requirements of any relevant regulatory body, government agencies and professional body.

### **CONFIDENTIALITY**

“Confidential information” consists of any information that is not or not yet public information. It includes trade secrets, business, marketing and service plans, consumer insights, engineering and manufacturing ideas, product, designs, databases, records, salary information and any non-published financial or other data.

ViewQwest’s continued success depends on the use of its Confidential Information and its non-disclosure to third parties. Employees shall not disclose Confidential Information or allow such disclosure, unless proper authorization is given or legally

mandated. All Employees must use their best efforts to avoid unintentional disclosure by applying special care when storing or transmitting Confidential Information.

ViewQwest respects that third parties have a similar interest in protecting their Confidential Information. In case that third parties, such as joint venture partners, suppliers or customers, share with ViewQwest Confidential Information, such information shall be treated with the same care as if it was ViewQwest's Confidential Information. In that same spirit, Employees shall protect Confidential Information with the same degree of care that they have obtained in the course of their employment.

## **CONFLICT OF INTEREST**

A Conflict of Interest occurs when personal interests of an Employee or the interests of a third party compete with the interests of ViewQwest. In such a situation, it can be difficult for the Employee to act fully in the best interests of ViewQwest.

All Employees shall not conduct themselves in such manner as likely to bring their private personal matters into conflict with their duties and shall avoid Conflicts of Interest whenever possible.

If a Conflict of Interest situation has occurred or if an employee faces a situation that may involve or lead to a Conflict of Interest, the Employee shall disclose it to his or her Line Manager and/or the HR or the Legal or Compliance Department to resolve the situation in a fair and transparent manner.

## **DISCRIMINATION AND HARASSMENT IN THE WORKPLACE**

ViewQwest respects the personal dignity, privacy and personal rights of every Employee and is committed to maintaining a workplace free from discrimination and harassment. Actions, words, jokes or comments based on an individual's sex, race, ethnicity, age, religion or any other legally protected characteristic will not be tolerated.

Employees who feel that their workplace does not comply with the above principles are encouraged to raise their concerns with the HR Department. Any Supervisor who becomes aware of possible harassment should promptly advise the Management or the Human Resources Department who will handle the matter in a timely and confidential manner.

## **ANTITRUST AND FAIR DEALING**

ViewQwest is prepared to compete successfully in today's business environment and will always do so in full compliance with all applicable antitrust, competition and fair dealing laws. Therefore, Employees must at all times adhere to the following rules:

- Commercial policy and prices will be set independently and will never be agreed, formally or informally, with competitors or other non-related parties, whether directly or indirectly;
- Customers, territories or product markets will never be allocated between ViewQwest and its competitors but will always be the result of fair competition;
- Customers and suppliers will be dealt with fairly.

All Employees, but especially those who are involved in marketing, sales and purchasing, or who are in regular contact with competitors, have a responsibility to ensure that they are familiar with applicable competition laws. When in doubt, the Legal Officer should be contacted in order to provide competition law advice and training.

## **COMPANY'S PROPERTIES AND INFRASTRUCTURE**

No Employee shall use property, information or opportunity arising during their course of duties for personal gain. Any use of assets must be authorised in writing by ViewQwest.

Employees shall safeguard and make only proper and efficient use of ViewQwest's property which is under their control. All Employees shall seek to protect ViewQwest's property from loss, damage, misuse, theft, fraud, embezzlement and destruction. These obligations cover both tangible and intangible assets, including trademarks, know-how, confidential or proprietary information and information systems.

To the extent permitted under applicable law, ViewQwest reserves the right to monitor and inspect how its assets are used by Employees, including inspection of all e-mail, data and files kept on ViewQwest's network terminals.

## **ENVIRONMENTAL, HEALTH AND SAFETY MANAGEMENT COMPLIANCE**

The Group will use its best endeavours to ensure a safe workplace and maintain proper occupational health and safety practices to commensurate with the nature of the Group's businesses and activities. The Group must not compromise the responsibility to its Employees and the environment and must at all times comply with local laws.

## **6. GUIDANCE AND REPORT CONCERNS ON ILLEGAL OR NON-COMPLIANT CONDUCT**

To help ViewQwest conduct business with uncompromising integrity and professionalism, everyone to whom the Code applies has an obligation to report possible violations of law, regulation, the Code, and other company guidelines.

Because the Code cannot address every situation, you should seek guidance whenever you are unsure about the correct course of action. There are many ways to ask questions about the Code or report concerns:

- (a) You can report an ethics or compliance concern by phone or email through the ViewQwest Compliance Officer number at +603-27750100 ext. 0145 or at [compliance@viewqwest.com](mailto:compliance@viewqwest.com).
- (b) You can email your question to [compliance@viewqwest.com](mailto:compliance@viewqwest.com).
- (c) You can ask questions or report concerns to internal groups who specialize in handling such issues, including Legal and Human Resource departments.
- (d) If you are not comfortable raising an issue with your manager, you can raise the matter with any manager in your direct management chain.

A ViewQwest team or relevant department will promptly review the matter to determine what actions are appropriate based on the findings consistent with applicable law, regulation, the Code of Conduct, or other company guidelines and all complaints shall be properly investigated. ViewQwest prohibits retaliation against any Employee for such reports made in good faith, while it also protects the rights of the incriminated person.

All Employees are required to cooperate fully with internal investigations, and anyone who fails to do so is subject to disciplinary action up to and including termination of employment or other service to ViewQwest, in accordance with applicable laws. You are required to provide honest, truthful, and complete information in any investigation.

## **7. MONITORING AND REVIEW**

Employees shall be responsible for the compliance of this Code and should ensure they use it to disclose any suspected danger or wrongdoing. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in complying with the Codes.

The Compliance Officer with the guidance from Management and Board of Directors will monitor compliance with the Policy and review the Code regularly or as and when needed to assess their effectiveness and ensure that it continues to remain relevant and appropriate. The Board of Directors reserves the total rights to all amendments, deletions or augment any terms and conditions or any part of this Code.

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