

## **Employee Code of Conduct**

### **1. Overview and Purpose**

The Employee Code of Conduct policy of EFD Group sets out our expectations regarding our employees' behaviour. We promote freedom of expression and open communication. But we expect all employees to follow our code of conduct. They should avoid offending, participating in serious disputes and disrupting our workplace. We also expect our employees to foster a well-organized, respectful and collaborative environment.

### **2. Scope**

This policy applies to all EFD employees (permanent, contract and temporary), contractors, consultants and all other workers in the company and its subsidiaries, including all personnel affiliated with third parties.

### **3. Policy**

#### **3.1 Compliance with Law.**

All employees must protect our company's legality. They should comply with all prevailing laws and be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

#### **3.2 Respect in Workplace.**

3.2.1 All employees should respect their colleagues. We won't allow any kind of discriminatory behavior, harassment or victimization. Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

3.2.2 Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work. All employees must be open for communication with their colleagues, managers or team members.

#### **3.3 Job Duties and Authority.**

All employees should fulfill their job duties with integrity, professionalism and respect toward all stakeholders and the community. Supervisors and Managers mustn't abuse their authority. We expect team leaders to delegate duties to their team members taking into account their competences and workload. Likewise, we expect team members to follow team leaders' instructions and complete their duties with skill and in a timely manner. We encourage mentoring and coaching throughout our Group.

### **3.4 Dress Code.**

Our company's official dress code is business casual. However, depending on the your role and position, you may be required to wear the company's uniform or may also be informed by your manager on how you should dress. If you frequently meet with clients or prospects, please conform to a more formal dress code. We expect you to be clean when coming to work and avoid wearing clothes that are unprofessional.

### **3.5 Workplace Health and Safety.**

3.5.1 EFD Group is committed to providing a healthy and safe work environment for our employees, customers, business partners and visitors. All employees are required to observe and follow all operating and safety requirements and take personal responsibility to support the Group's commitment in providing a healthy and safe work environment.

3.5.2 All employees are required to ensure that all safety rules and instructions are adhered to, taking corrective actions when necessary. All employees are also expected to take action and/or furnish information/document that are considered necessary and/or desirable to safeguard the health and safety of the Company's employees, customers, business partners and visitors.

### **3.6 Protection of Company Property.**

3.6.1 All employees should treat our company's property, whether material or intangible, with respect and care. Employees should protect company facilities and other material property (e.g. company cars) from damage and vandalism, whenever possible.

3.6.2 Employees should not misuse company equipment or use it frivolously. Employees should respect all kinds of incorporeal property. This includes trademarks, copyright and other property (information, reports etc.) Employees should use them only to complete their job duties.

### **3.7 Safeguarding Official Information.**

All official information acquired in the course of employment with the Group is of a strictly confidential nature. Employees are not allowed to publish or communicate to any other person in any form whatsoever, except in the course of their official duties. This condition shall apply both during and after employment with the Group.

### **3.8 Benefits.**

All employees shall not abuse their employment benefits. This can refer to time off, insurance, facilities, subscriptions or other benefits our company offers.

### **3.9 Exclusive Service.**

An employee shall not, without the prior written permission of the Company, be employed in any capacity for any period by any person, government, statutory board, firm, company or organisation other than the Company.

### **3.10 Conflict of Interest.**

If an employee's family member(s) is/ are engaged in any business which has dealings with the Group that could have the effect of putting the employee in a position of conflict of interest in the discharge of his duties towards the Company, he must inform the Company in writing as soon as possible.

### **3.11 Group Policies.**

All employees should read and adhere to the Group policies. They should consult the policy owners should they need any clarifications.

## **4. Policy Compliance**

### **4.1 Compliance Measurement**

The Group will verify compliance to this policy through various methods, including but not limited to, periodic engagement, reports, internal and external audits, and feedback to the policy owner.

### **4.2 Exceptions**

Any exception to the policy must be approved by the policy owner in advance.

### **4.3 Non-Compliance**

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment. We may take legal action in cases of, theft, embezzlement or other unlawful behavior.