

EMPLOYEE CODE OF CONDUCT

1. Introduction

All Bluesify directors and employees (hereinafter shall be referred to as, "Employees") must adhere to the Code of Conduct as laid down by the Company. Any breach of the Code of Conduct will give rise to disciplinary action and may, where applicable, give rise to criminal prosecution.

Any Employees who have any doubt about the propriety of any course of action or who find that his/her own interests are or may be in conflict with those of the Company should seek advice of the Legal Governance Department.

Employees must always be alert to circumstances which are susceptible to fraud, forgery or corruption, in order to protect the Company and all other Employees from possible malpractice or allegations of malpractice.

2. Customer Service

The Company place great importance on the provision of good customer service or high service standards to both external and internal customers. The Code of Conduct on performing customer services has been pre-set for respective job functions.

3. Conflict of Interest

Employees must avoid engaging in any business, investments or activities that may be in conflict with the Company's interests. Employees are required to declare to the Company any financial interest, direct or indirect, which they may have in any business with which the Company has business dealings. All declarations should be made to their immediate supervisor and the Governance Unit.

4. Confidentiality Clause and Data Protection

No Employees shall, during or after the termination of his/her employment with the Company (except in the proper course of his/her duties or with the Company's written consent) divulge or make use of any secret or of any correspondence, accounts, connections or dealings of the Company or its customers or of any knowledge gained in relation thereto during his/her employment. Employees are prohibited from using company information to obtain financial gain.

All documents or other materials created by any employee in the course of his/her duties with the Company shall remain the sole property of the Company.

5. Conduct when Conducting Business

All Employees regardless of his/her position are prohibited from offering any bribe or similar consideration to any person or company in order to obtain business for the Company.

Any commissions paid or other payment made, or favorable terms conceded, or other

advantages given, by any employee on behalf of the Company shall be in accordance with the Company's policies on such matters as notified from time to time and shall promptly be recorded in writing.

6. Acceptance of Financial or Non-Financial Personal Interests

6.1. Anti-Corruption Act 1997

All Employees should note carefully the provisions in Part III Section 10 of the Anti-Corruption Act 1997 which make it an offence for an employee to solicit or accept an advantage in connection with his/her work without the permission of the Company.

6.2. Soliciting and Accepting Advantages

Employees should actively discourage customers from offering personal benefits of any kind (including gift, loan, fee, reward, office, employment, contract, service and favors).

No Employees shall solicit, accept or retain personal benefits from any customer of the Company or any individual or organization doing or seeking to do business with Bluesify. However, provided that there is no reasonable likelihood of improper influence on their performance of their duties on behalf of the Company, any employee is permitted to accept from the following advantages (but NOT solicit):

- (a) any advertising or promotional gifts not exceeding RM250 in value.
- (b) any commercial discounts which are equally available to other people outside the Company.
- (c) any normal business entertainment (for example, a meal involving no more than ordinary amenities).
- (d) any gift given on festive occasions under customary practice, subject to a maximum limit of RM250 in value.
- (e) any personal benefit arising from kinship or marriage.

7. Use of Personal Computer

7.1. PC or LAN

- (a) Anti-virus software should be employed at all times.
- (b) The use of pirated or unlicensed software is strictly prohibited as well as a criminal offense. Authenticate software must be used at all times.
- (c) No games software (except those that come with Windows) or playing games are allowed on any PC. All incidences will result in disciplinary action.
- (d) Software should not be installed onto PC without the consent of CTO.

7.2. E-mail

- (a) Personal use of e-mail should be kept to a minimum.
- (b) When replying to mail messages, only "REPLY TO ALL" when it is necessary. This is especially true if you are setting up rules for autoreply.

- (c) Avoid “mass” distribution of e-mail or message broadcast to a large group of users unless necessary.
- (d) E-mail is a convenient means of sending/receiving small files to/from users, but large file transfers should be avoided as far as possible. Sending illegal software or games through company e-mail will result in disciplinary action.
- (e) The distribution of “CHAIN LETTERS”, defamatory, discriminatory and/or pornographic material through e-mail is strictly prohibited and will result in disciplinary action.

7.3. Internet/Intranet

- (a) The Company’s Internet access is strictly for BUSINESS USE, frequent surfing of the internet unrelated to your work requirements will result in loss of access and possible disciplinary action.
- (b) All information found on the Company’s Intranet is strictly confidential.

7.4. Security

- (a) ALL passwords must be kept strictly confidential.
- (b) Screen saver passwords should be used at all times.
- (c) PC’s must be powered off before leaving the office.

7.5. Loss of Notebooks

- (a) Employees are strongly encouraged to ensure the security & safekeeping of notebooks deployed to them. This would mean not negligently leaving it in the car or public area unattended or even in a concealed boot.
- (b) Any loss of notebook must be reported to the police authorities & a copy of the police report forwarded to the reporting manager and CTO for the record.
- (c) Should the employee lose their notebooks, they will be liable to pay the net book value.

8. Social Media

8.1. Post Thoughtful and Respectful Comments

Ensure that all comments and posts are meaningful, relevant, and respectful. Avoid spamming, sharing irrelevant content, or making offensive or inappropriate remarks. Keep the discussion focused and constructive.

8.2. Reflect Before Posting

Always take a moment to pause and consider the impact of your message before posting. Respond to comments in a timely and thoughtful manner, especially when a response is warranted or expected, while maintaining professionalism.

8.3. Protect Confidentiality and Proprietary Information

Be mindful of the confidentiality agreements you are bound to. Do not disclose proprietary information, trade secrets, or sensitive data related to Bluesify, our clients, or business partners. Upholding these standards safeguards our relationships and

maintains trust.

8.4. Maintain Professionalism in Disagreements

When expressing differing opinions, ensure your responses are respectful, polite, and professional. Disagreements should never escalate into personal attacks or unprofessional conduct.

8.5. Comply with Copyright and Disclosure Laws

Adhere to all copyright regulations and financial disclosure laws. Never share Bluesify's confidential information or any proprietary data without proper authorization and ensure that all content shared is legally compliant.

8.6. Exercise Caution and Seek Clarification

If you are unsure whether a post or comment is appropriate, refrain from posting. When in doubt, consult with your manager or the HR Department to ensure that your contributions align with Bluesify's policies and values.