



ALYPZ

Code of Conduct and Business Ethics

Foreword by CEO

Dear Team,

As we navigate the complex and ever-evolving landscape of our industry, our commitment to business ethics remains our guiding star. At Alypz, we firmly believe that our success is built not only on our business acumen but also on our adherence to the highest standards of ethical conduct. Ethics are the cornerstone of our organizational culture and the foundation of the trust our clients, partners, and stakeholders place in us. It is through our unwavering dedication to integrity, transparency, and accountability that we distinguish ourselves as leaders in our field.

Our ethical standards are not just guidelines; they are the principles that drive our daily decisions and actions. In this spirit, we have developed a comprehensive Business Ethics Policy that outlines our core values and the standards we expect from every member of our team. This policy is not merely a document but a reflection of who we are and what we stand for. It provides clear guidance on how to handle ethical dilemmas and reinforces our dedication to doing what is right, even when it is challenging. They ensure that we operate with honesty and fairness, treat each other with respect, and uphold our responsibilities to the communities we serve.

This policy will apply not only to all employees and directors within the Alypz, but our contractors, sub-contractors, consultants, agents, representatives and others performing work or services for or on behalf of Alypz as well. In particular, this policy expressly prohibits improper solicitation, bribery and other corrupt activity not only by employees and directors but also by third parties performing work or services for or on behalf of the Company. Each of us plays a crucial role in upholding these values, and it is our collective commitment that shapes the reputation of Alypz.

As we move forward, I encourage each of you to familiarize yourselves with this policy and to integrate its principles into your daily work. Remember, ethical behaviour is not just about following rules; it is about embodying the values that define us as an organization. When faced with difficult decisions, let our commitment to ethical practices guide you and remind you of the trust placed in us by our clients, colleagues, and communities.

Together, let us continue to build a culture where integrity is not an aspiration but a way of life. Thank you for your dedication to upholding our ethical standards and for your unwavering commitment to excellence.

Thank you.

A handwritten signature in black ink, appearing to read 'Mohd Jailani Mustafa', with a horizontal line underneath.

.....
MOHD JAILANI MUSTAFA

Chief Executive Officer

14th October 2024

General Business Principles

ALYPZ SDN. BHD. (Alypz) is a dynamic global company with core intent to power industrial's safety and health compliances responsibility and sustainability. In upholding our commitments as a responsible and conscientious player in the industry, safety and sustainability remain our core considerations of what we do and how we do it. We at Alypz are committed to grow our business responsibly, positively contributing to society and environment.

Customer Focus:

We provide outstanding service to enhance customer satisfaction and loyalty. Address issues promptly and seek continuous feedback to improve service quality.

Integrity and Ethics:

We conduct business with honesty, transparency, and ethical behaviour. Upholding high moral standards builds trust and credibility with stakeholders.

Strategic Planning:

We develop and implement a clear strategy that aligns with the organization's vision and goals. Regularly review and adjust plans based on performance and market changes.

Innovation and Adaptability:

We embrace change and seek new opportunities for improvement and innovation. Stay agile to respond to evolving market conditions and technological advancements.

Effective Communication:

We foster open, clear, and consistent communication within the organization and with external stakeholders. Good communication supports collaboration and prevents misunderstandings.

Leadership and Management:

We provide strong leadership and effective management to guide the team towards achieving objectives. Inspire, motivate, and support employees to perform at their best.

Operational Efficiency:

Our streamline processes and eliminate waste to improve productivity and reduce costs. Focus on optimizing operations to deliver products or services effectively.

Risk Management:

We identify, assess, and mitigate risks to minimize potential negative impacts on the business. Develop contingency plans to handle unforeseen challenges.

Legal and Regulatory Compliance:

We adhere to laws, regulations, and industry standards. Ensuring compliance helps avoid legal issues and penalties while maintaining a good reputation.

Human Resource Management:

We recruit, develop, and retain talented employees. Invest in training and development to enhance skills and promote a positive work environment.

Sustainability and Social Responsibility:

We consider the environmental and social impacts of business activities. Promote sustainable practices and contribute positively to the community.

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1. This Code of Conduct and Business Ethics is intended to apply to every employee of Alypz group of company. It is also intended to apply to every director (executive and non-executive) for those companies, except otherwise stated in this Code. Failure to comply may have severe consequences to Alypz and may result in disciplinary action against you, or even your dismissal from Alypz, subject to the requirements of applicable law.
2. This Code applies to you in your capacity as third-party conducting business with Alypz and Alypz requires the same level of integrity and business conduct from you, whether you are engaged as an agent, an intermediary, engaged to provide goods/services for, jointly with or on behalf Alypz or counterparty in a business transaction with Alypz. Third parties refer to both individuals and corporate entities including but not limited to director, officer, employee, agent, consultant, nominee, representative, license, adviser, sub-contractors, any service provider. Your failure to comply may have severe consequences for both Alypz and yourself and may results in Alypz requesting you to take remedial steps to remedy a breach, or even suspending, terminating business relationship with you and seeking to enforce any other contractual rights we have against you for breaching this Code.
3. If you wish to direct your concerns on Alypz unit or official, contractors, sub-contractors, consultants, agents, representatives, or other service providers, in lieu of contacting your Head of Department, Human Resource Department, the Compliance and Corporate Communication Committee or Alypz contact person, you may also contact whistleblowing channel platforms:
 - a. Email to ethics@alypz.com or;
 - b. Online Whistleblowing Form
4. This Code is prepared in both English and Bahasa Malaysia and may appear in other languages. In the event of any conflict, the English version will prevail.
5. If there is any conflict between the law and the rule or policy set out in this Code, you should comply with the law. However, if there is any conflict between the local custom or policy with this Code, you are called upon to comply with this Code. If you perceived that this provision of this Code conflicts with the law in your jurisdiction, you should consult with your Head of Department, Human Resource Department or Compliance and Corporate Communication Committee rather than disregard this Code without consultation.
6. The provision of this Code may be amended or waived by Alypz from time to time at Alypz sole discretion. Alypz expects that waivers would only be granted in exceptional circumstances and then only keeping with applicable law and Alypz's policies and procedures. The provision of this Code may be supplemented or modified for jurisdiction through local guidelines that have been approved through the Compliance and Corporate Communication Committee. In particular, provisions concerning disciplinary procedures and actions for your jurisdiction may be set out in a Legal Advisor for your jurisdiction. If no such provision are set out, the standard disciplinary rules and practices for dealing with violations of company policy will apply, in every instance subject to the requirements of applicable law in your jurisdiction. This Code may be implemented through a handbook or contract terms and conditions, or similar manual or document which may address additional matters beyond the scope of this Code.
7. This Code does not identify or set out every law, policy or procedure that may apply to you in the performance of your role. You are responsible for informing yourself on concerning laws and other Alypz policies and procedures that apply to you as a results of your role with Alypz. This Code does not constitute legal advice.
8. This Code does not seek to address every situation you may encounter in the course of your employment and in conducting business with Alypz. Explanatory statements, supporting Guidelines or examples set out under this Code may or may not be applicable to your situation/relationship/ arrangement with Alypz and act to serve as guidance only. This Code is not a substitute of your own duty, responsibility, accountability to comply with all laws applicable to you, or your business, not a substitute of your good judgement in exercising and making business decisions.

VISION

To be the one-stop solution provider for occupation health, safety, security and environmental assessment, and advisory services

MISSION

To help customers create a safe environment for their employees, business partners and communities around them by delivering quality services through industry relevant best practices

CORE VALUES

E EXCELLENCE	Emphasizes the pursuit of high standards quality in all aspects of work
X XENIAL	Fosters a culture of openness and inclusivity
P PROFICIENT	High level of competence, skill, and knowledge in our area of expertise
E ETHICS	Upholding moral principles and integrity in every action and decision
R RELIABLE	Consistently meeting commitments and fulfilling expectations
T TEAMWORK	Work collaboratively to achieve shared goals and support one another

WORK CULTURE

- We strive for the highest standards of performance
- We operate with full of integrity
- We compete fairly, ethically and lawfully
- We protect our asset, property and company information
- We manage data and use information technology carefully
- We commit to health and safety
- We treat people with dignity and respect
- We respect our community and environment

1. Where the context or construction requires, all words applied in plural will be deemed to include the singular, and vice versa; the masculine will include the feminine and neuter, and vice versa; and the present tense will include the past and the future tense, and vice versa.
2. Reference to “you” and “we” in this Code refer to any person to whom this Code applies. Where more specific references are used (such as “employee”), the more specific reference intended.
3. For purpose of this Code, the term “family/household” include your spouse(s), children (including step-children and adopted children), parents, step-parents, siblings, step-siblings, grandparents, grandchildren, in-laws, uncles, aunts, nieces, nephews, and first cousins, as well as other persons who are members of your household.
4. For purpose of this Code, the term “employee” means any person who is in the employment of Alypz including but not limited to executives, non-executives, secondees, interns and individuals on direct hire or contract workers.
5. The term “Alypz” and “Company” means Alypz Sdn. Bhd. and its subsidiaries and controlled companies. The expression “Alypz” or “the Company” is used for convenience where reference are made to Alypz companies in general. The companies in which Alypz has direct or indirect shareholding are distinct legal entities.
6. For purpose of this Code, the term “Alypz contact person” means Alypz’s focal person that can be contacted by any third-party having business dealing with Alypz.



WE OPERATE WITH FULL OF INTEGRITY

We operate with integrity in everything we do. We say no to bribery and corruption in all its forms at Aypz. We never give and receive inappropriate payments.

We never allow our personal interests, or relationships to interfere with our ability to make business decisions in the best interest of Aypz.



Alypz conducts its activities fairly and carries out constant monitoring to safeguard and manage the possible impartiality and conflict of interest. All employees or third party who directly involve in the process of delivering the services are required to disclose known relationships with the body being assessed.

MANAGING RISKS TO IMPARTIALITY

- Our management system has the necessary procedures, safeguards and tools to ensure that these policies are strictly upheld and enforced;
- We identify threats to its impartiality on an ongoing basis. This includes threats that arise from its activities, related to:
 - a. Self-interest threats
 - b. Self-review threats
 - c. Relationship threats
 - d. Intimidation threats
 - e. Advocacy threats
 - f. Financial threats
 - g. Other pressure to compromise impartiality

PROFITING FROM YOUR POSITION

- Business opportunities may arise as a result of your access to Company property or information or because your position within the Company. Alternatively, you may find business opportunity during, or as consequence of your position with the Company. Business opportunity of this sort belong to the Company, and you must not seek to take advantage of Company property, information or your position within the Company, or business opportunities arising from these, for personal gain or to compete with the Company.
- Neither employees or their immediate family members should hold positions, or have relationship with, or interests in a competitor, customer, partner or supplier of the Company that would create conflict of interest.
- You are not allowed to participate in or influence the purchase of goods and services from any Company or person in which or through which that employee has or will obtain a direct or indirect interest or benefits.
- Employee should not take additional employment with outside organisations or operate their own business if the employment activity will create an actual or perceived conflict of interest (e.g., employment with competitor, customer or supplier), unless with the written agreement from the Management.

PROVIDING THE SERVICES

- If you directly involve in providing the services, you enter into legally-enforceable agreements with the customers, retain all authority and responsibility for certification and inspection activities of all decisions and statements made.
- You are responsible for the impartiality of our testing, certification and inspection activities and shall not allow commercial, financial or other pressures to compromise impartiality;
- You are required to disclose known relationship with the body being assessed.
- You should act impartially and ensure through internal procedures, the objectivity of the testing, certification and inspection activities, and manage potential conflict of interest according to the standards of the applicable projects;
- You should ensure your decisions are made through an effective process based on objective evidence of conformity or nonconformity, and that any decisions made are not influenced by other interests or by other parties. Testing, certification and inspection decisions are made and approved by a competent person who is free from influence by other interests or parties, including those of its customers;
- We should not offer certification as part of the equipment installation services provided except commissioning and/or manufacturer calibration. Customer must assign third party certification body to conform the equipment performance;

NON-BUSINESS WORKPLACE RELATIONSHIPS

- When relationships go beyond professional or social friendships, like family or romantic relationships, they can create conflicts of interest and lead to favoritism or bias. These relationships may also harm key values like respect among staff and damage Alypz's reputation. Under the circumstances, such relationships are discouraged.
 - a. You should notify in writing to your Head of Department in consultation with HR via filling up the *Conflict of Interest Declaration Form*
 - b. Your terms of employment may impose additional requirements.
 - c. You may not supervise directly or indirectly any employee with whom you have such relationship.
 - d. Other than exceptional circumstances where arrangements may be authorised, no employee should be in a position of influence regarding the employment conditions (e.g., work assignment, compensation, etc) or performance assessment of family member.

Alypz takes a *zero-tolerance approach* to all forms of bribery and corruption and shall continuously conduct its business activities ethically, honestly and with high standards of integrity. This also applies to the Company's business activities in all countries worldwide.

OUR COMMITMENT

- We conduct business in an ethical, honest manner, implementing and enforcing systems that ensure bribery is prevented.
- We act professionally, fairly, and with integrity in all business dealings and relationships, in wherever country we operate.
- We constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate.
- We should recognise that bribery and corruption are punishable. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.
- We provide training to our people on this policy as part of the induction process for all new employees as well as regular training to ensure continuity.

OUR PEOPLE

- You ensure that you read, understand, and comply with the information contained within this Code of Conducts and Business Ethics Policy and with any training or other anti-bribery and corruption information you received.
- You have equal responsibility for the prevention, detection, and reporting of bribery and other forms of corruption.
- You avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.
- You will notify the Management if you have reason to believe or suspect that an instance of bribery or corruption has occurred.
- You will face disciplinary action or dismissal for gross misconduct and has the right to be terminated if you breach this anti-bribery policy.

OUR PARTNERS

- We seek to engage third party that who share the same values as us and will uphold the Company's principle of applying high ethical standards in our business dealings against bribery and corruption.
- The third-parties refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.
- Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

UNACCEPTABLE PRACTICES

This policy refers to four areas. :

- Gifts and hospitality
- Facilitation payments
- Political contributions
- Charitable contributions

Note : For further information please see *Conflict of Interest Policy* and *Gifts, Entertainment and Hospitality Policy*.

Alypz adopts a No Gift, Entertainment and Hospitality Policy whereby all members including but not limited to their Directors and Employees are prohibited from giving and receiving any Gift, Entertainment or Hospitality. This Policy also extends to family members, representatives and/ or Business Associate of Personnel and Third Party.

GIFTS AND HOSPITALITY GIVING

- You shall not offer or give a gift or hospitality if you aware or suspect that it would be in breach of the rules.
- You may give corporate gifts, i.e. bearing the Company's logo/ identity and of nominal value for the purposes of promotions/ branding/ marketing. Any gift-giving or event of hospitality is subject to approval according to the authority limits and shall fulfil the following conditions:
 - a. They are limited, customary and lawful under the circumstances;
 - b. They do not have or are perceived to have (by either the giver or the receiver), any effect on actions or decisions;
 - c. There shall be no expectation of any specific favour or improper advantages from the intended recipients;
 - d. The independent business judgment of the intended recipients shall not be affected;
 - e. There shall not be any corrupt/ criminal intent involved;
 - f. The giving out of the gift and hospitality shall be done in an open and transparent manner; and
 - g. Personnel from the Company must be present (as the host) when providing hospitality. Otherwise, the expenditure is considered as a gift.

GIFTS AND HOSPITALITY RECEIVED

- Acceptance of gifts and hospitality is allowed provided that gifts and hospitality received shall be modest in value and proportionate to the position.
- You shall not accept any gift or hospitality if it could be misconstrued as a reward, an inducement or other corrupt acts.
- You shall not accept gifts in the form of cash or cash equivalent (including gift certificates, loans, commissions, coupons, discounts or any other related forms) except if it is part of a customary practice and this should be limited to a nominal value and reported to Human Resources. Example of gifts and hospitality that is acceptable are as follows:
 - a. Gifts : Corporate promotional, seasonal/festive
 - b. Hospitality : Refreshments (tea/coffee) or working lunches.

ENTERTAINMENT

- You shall never entertain to give or receive with the intention of influencing someone to act improperly, or as a reward for having acted improperly.
- You are STRICTLY PROHIBITED from either paying for or participating in any activities which are exorbitant, illegal and immoral such as lavish/ extravagant social functions not related to Alypz's business activities or entertainment from a business associate (including potential business associate) during the procurement process which may cause Alypz to be perceived in an unfavourable or negative manner.
- Entertainment activities shall be limited to only those individuals who have a legitimate business purpose. You will not be paid for or getting reimburse expenses for the said individuals closely related person(s), i.e. spouse(s), family members, relatives or close associates who do not have a legitimate business purpose with the Company.

DONATION AND SPONSORSHIP

The Company may allow charitable donations and sponsorships for legitimate reasons and as permitted by existing laws and regulations. However, the Company STRICTLY PROHIBITS the giving and receiving of donations and sponsorships to influence business decisions.

POLITICAL CONTRIBUTIONS

Alypz does not offer monetary or in-kind political contributions to any political party, political party official or candidate running for political office.



WE COMPETE FAIRLY, ETHICALLY AND LAWFULLY

We always operate in compliance with the law by competing in this industries fairly, maintain fair and reasonable business practices.



Alypz enforces a zero-tolerance approach on all forms of anti-competitive conduct committed by employees or business partners acting on its behalf, in a manner to support fair and open competition, with honest and transparent business practices that comply with Competition Act 2010

ANTI-COMPETITIVE MEASURES

- You understand that violating Competition Act, can have legal and regulatory consequences, including civil and criminal liability, possible imprisonment, monetary fines and penalties on Alypz and Employees, reputational damage as well as debarment of Alypz from bidding.
- You must not take or appear to take any action that could unfairly exclude or reduce competition in any market.
- You must not misrepresent, manipulate, conceal, misuse confidential information, and must not engage in disparaging discourse against competitors, or unfair practices with shareholders, clients, business partners, competitors and other employees.
- You consult with Legal Committee/Consultant prior to entering into any collaborative arrangements with its competitors, vendors or clients, such as joint ventures
- You must only obtain information about competitors, their products, services, technologies, pricing, marketing campaigns, etc. only through legal and ethical means.
- You must also not enter Alypz into any business arrangement or cartel conduct to eliminate or discourage competition or confer an inappropriate competitive advantage. Prohibited activities include, but are not limited to;
 - a. Bid rigging
Competitors coordinate tenders, whereby one or more competitors agree to either not submit a bid, withdraw a bid, or submit a bid arrived at by agreement where the entity requesting the tenders is not informed of the agreement made between the parties.
 - b. Market sharing
Competitors agree to divide or allocate customers or geographic markets, or to restrict production of a product by setting quotas among competitors or other means, rather than making independent decisions as to where to operate, who to source from and which customers to pursue. Market sharing includes allocating customers by geographic area, agreeing not to compete for each other's customers and agreeing not to enter or expand into a competitor's market.
 - c. Price fixing
An agreement (written, verbal, or inferred from conduct) among competitors that raises, lowers, or stabilizes prices or competitive terms.
 - e. Price signalling
Competitors arrange methods to signal pricing to each other to coordinate sales at uniform prices.
 - f. No-poaching agreement
Competitors mutually agree not to solicit or hire each other's employees, unless it is reasonably necessary for parties to give effect to a broader agreement, such as a joint venture or merger and acquisition agreement, subject to certain conditions.
 - g. Exchange of confidential information
Parties who compete with one another, even if contemplating a transaction or the exchange of information in another context, engage in discussions or information exchanges that adversely impact competition between them. In the context of mergers and acquisitions due diligence, arrangements are put in place to ensure that the confidential information exchanged cannot be used for any commercial purpose other than the contemplated transaction.
 - a. Abuse of dominance
A dominant firm, or group of firms, substantially prevents or lessens competition, by engaging in acts that aim to eliminate or discipline competitors, or to stop potential competitors from entering a market, such as limits the supply of goods and services to restrict competition.

UNFAIR AND DECEPTIVE MARKETING

- Alypz shall provide accurate, true and complete statements regarding its capabilities whether verbally or in marketing or tender materials, and must be backed by appropriate documentation;
- No false or misleading remarks shall be made about competitors, vendors and clients and their products and services; and
- Alypz shall not maliciously collect and destroy competitors' marketing materials, harass competitors by fictitious inquiries, coerce or intimidate suppliers or pass off competitors' products and services as the products or services of some other firm.

Alypz responsible towards the consumer protection affairs through new laws and policies review and proposal to protect consumer, receive consumer complaint and act as a secretariat to the National Consumer Advisory Council (NCAC) and comply with Consumer Protection Act (CPA) 1999 (or Act 599)

CONSUMER'S GUARANTEE

- a. The Malaysia's Consumer Protection Act 1999, you have guaranteed legal rights for goods and services you purchase. These are called consumer guarantees.
- b. All goods & services purchased, come with guarantees that cannot be excluded under The Malaysia's Consumer Protection Act 1999.
- c. Customer are entitled to a replacement or refund for a major failure and for compensation for any other reasonably foreseeable loss or damage.
- d. Customer are entitled to have the goods repaired or replaced if the goods fail to be of acceptable quality and failure does not amount to a major failure.
- e. Consumer guarantee cannot be excluded and are in addition to any extended warranty they purchase or any voluntary warranty (warranty against defect) the customer are given.
- f. There may be circumstances where customer are not entitled to a remedy.

CONSUMER'S RIGHT

- a. The right of safety - The consumer's right of safety from product and services that may harm his health and safety
- b. The right to know - The right of the consumer to know the correct information about the goods and services
- c. The right to choose – The right to have multiple alternatives of goods and services of quality and at competitive prices
- d. The right to listen to his opinion – The rights of the consumer to express his opinion on the quality of the goods and services, their prices and availability.
- e. The right of education – The right of consumer to acquire knowledge and skills and to raise his awareness of his rights and responsibilities through permanent awareness programs.



WE PROTECT OUR ASSET, PROPERTY AND COMPANY INFORMATION

Sometimes we have access to information about Aлыпz or third parties we deal with, that is considered company information. Our duty is to use the information lawfully and responsibly.





We only use assets and resources for intended purpose, and as required to do our jobs. We maintain complete, accurate and timely business records. We act within our delegated authority and seek approval for payment and transactions.

ASSET AND RESOURCES

- You shall take necessary precautions to safeguard our assets and resources including tangible and intangible assets such as equipment, inventory, technology, money, data and confidential information.
- You are responsible for protecting Company's asset, facilities, resources and records against waste, loss, damage, misuse, theft, misappropriation or infringement.
- In the event a device is lost or stolen, you or the owners must report the incident immediately.
- Any loss or damage suffered by the Company may be recovered by the employees.
- The Company may at its discretion take any appropriate disciplinary action against the employee including reporting to the public authorities.

MAINTAINING ACCURATE BUSINESS RECORDS

This policy applies to all official records generated in the courses of the Aypz operations, including but not limited to:

- a. Typed or printed hardcopy (papers) documents;
- b. Electronic records and documents (email, Web file, text files, PDF files);
- c. Video or digital images;
- d. Electronically stored information contained on network servers and/or document management system;

We maintain complete, accurate, timely and auditable records based on the following:

- a. We ensure all Aypz records are accurate and are managed in accordance with our Confidential Information Policy and internal procedure.
- b. All records should be retained only as long as necessary to meet legislative, fiscal, contractual, administrative, and operational requirements.
- c. Employee and service providers must ensure that documents for which they are responsible are accurate, complete, and are retained for the periods of time indicated in the Control of Records Procedure, to meet legislative, fiscal, contractual, administrative, and operational requirements.
- d. Documents must be managed and disposed of in a manner appropriate to the sensitivity of the information they contain. Care must be taken to ensure that all personal and confidential information contained therein is permanently and securely destroyed.

PERSONAL VALUABLE ITEMS

- You are advised not to bring private property or valuable item to work. We will not be responsible for loss or damage to any private property on our premises.

INTELLECTUAL PROPERTY

- The Company shall own their intellectual property (including without limitation patents, copyright and registered designs) arising out of work done by you in the course of your duties, whether the work has been done during normal working hours or on its premises.
- You shall sign document and declarations and do anything else which the Company may request to protect or transfer such intellectual property rights or register them in the name of the Company or its nominee.

All people, including Alypz's employees, trainee, committee members, partners, consultants, personnel of external bodies or individual acting on the Alypz's behalf, shall keep confidential all information obtained or created during the performance of Alypz's activity, except if required by law.

CONFIDENTIAL INFORMATION

- Preservation and protection of the Alypz proprietary interests in confidential business information and trade secrets are vital to protect the interest and growth of the organisation.
- It is also essential that all aspects of client/customer information are treated confidentially. Private information about individuals are collected in a number of different ways – by discussion, or on a number of forms, reports and records which are utilised throughout the organisation. Personal client/customer information is privileged and must be protected.
- This policy applies to all confidential information which is not in the public domain, and which is reasonably regarded by the organisation as confidential to it which the people becomes aware during his or her employment or engagement including, but shall not be limited to the following:
 - a. Trade secrets;
 - b. Confidential business (including financial) and technical information;
 - c. Business methods and management systems;
 - d. Detailed information and records relating to clients/ customers (including names, addresses, and telephone number), suppliers and workers and parties with whom the organisation deals commercially;
 - e. Any information which is confidential or commercially sensitive to any of the organisation's clients/customers;
 - f. Strategic information relating to marketing, advertising or any other aspect of business;
 - g. Computer software and data;
 - h. New product research and development strategies;
 - i. Any other information not generally known to the public.

OUR COMMITMENT

- You shall be aware of our obligations regarding confidentiality of information;
- You shall hold all confidential information in confidence and shall not without written consent from the appropriate person within the organisation directly or indirectly, at any time during, or following the cessation of employment or engagement;
 - a. use any confidential information;
 - b. Disclose any confidential information to any person, firm, company or entity;
 - c. Copy or otherwise reproduce, memorise or record any material (printed or electronic or otherwise) containing confidential information for personal use or for use by any other person, firm, company or entity;
- Whenever Alypz is required by law or authorised by contractual arrangements to release otherwise confidential information, the customer or individual is to be notified (unless the notification is prohibited by law). This is also applicable to information related to them gained from other sources. The source is to remain confidential to the customer unless otherwise agreed to by the source.
- Under no circumstances should clients' or customers' affairs or personal information be discussed or disclosed to employees, or improperly shared without authorization, whether the disclosure occurs within the organization or externally;
- You shall deliver up to the organisation immediately on demand, all copies of any confidential information in that their possession or control, in whatsoever form those copies may be;
- You may require to sign Statutory Declaration or *Non-Disclosure Agreement (NDA) form*, declaring in terms satisfactory to this policy has been abided by in full.



All internal and external communications that have a direct or indirect impact on the image and reputation of Alypz or its constituents should be managed exclusively by the Authorized Spokesperson, to ensure accuracy and consistency of the information. As a mandatory principle, no employee should communicate externally about confidential information belong to the Company and its Constituents unless they have been authorized or have received prior approval from the CEO. All statement and confidential information that Alypz releases publicly or submits to appropriate authorities must be shared with the Corporate Communication Lead in advance to avoid misinterpretation, misunderstanding, and/or confusion.

APPLICABILITY

- The Communication Policy applies to all publication or written statements in reports, articles, journal, books, magazine, periodicals, leaflets, brochure, media releases, photograph, posting in social media, letters to shareholders or employees, statements from management, information on the Company's digital communication platforms, scientific and analytical information in public registers and other content in both external and internal communications without written approval by the Company and owner of the information.
- The policy also covers all verbal statements at group or individual meetings and conversation with external parties, interviews, broadcast, delivery any lecture or speech on any matter which concerns with his duties of information or material relating to the business of the Company or any matter connected with the activities of the Company and its business.

THE PRINCIPLES

- In all situations where any form of communication is to take place, regardless of whether it is through written or oral communication and regardless of choice of medium and recipient, all persons must in each situation evaluate the impact and consequences of the communication.
- When handling inside information, each person has an independent responsibility to ensure that they comply with relevant rules and requirements.
- The principles for Alypz's communications are to:
 - a. Communicate in an open, reliable, well-structured and transparent way, both internally and externally;
 - b. Disseminate all information timely and accurately;
 - c. Fulfil legal requirements
 - d. Uphold a high level of ethics;
 - e. Ensure the reliability of information by maintaining specific communication channels and procedures;
 - f. Ensure a consistent and aligned communication to protect and promote our company image and business in a proper and consistent manner.
- Mandatory review is required for internal and external communication based upon:
 - a. The potential for controversy or significant publicity;
 - b. The likelihood it may contain financial, and information not previously disclosed to the employee/public; and
 - c. The breadth of circulation to external audiences.

INTERNAL COMMUNICATION

- ALYPZ shall ensure that the relevant information related to the Company are internally communicated among the various levels and functions of the organization including the changes, as appropriate to enable employees to contribute to continual improvement.
- The Department Leads are responsible on internal communication within ALYPZ. All internal memo and circulation shall not be proceeded without approval from the Manager in charged identifiable and dated for reference.

EXTERNAL COMMUNICATIONS

- None of the employee shall do the publication, broadcast, speeches without written approval by the relevant party and Chief Executive Officer on any confidential information belongs to the Company.
- Preparation: All media releases, public statement, are to be prepared by the Corporate Communication Team with consultation from the appropriate company personnel and subject matter experts.
- Review and Approval: All media releases including teleconference, news conferences and briefings must be reviewed and approved by the Chief Executive Officer prior to distribution. Subject matter experts from the appropriate business units may be included in the review and approvals process from time to time as required. Depending on the nature of the subject matter, the Chief Financial Officer and the Legal Committee counsel may be required to participate in the review and approval process
- Distribution: All news releases shall be distributed by the Chief Operating Officer.

CRISIS EVENT / EMERGENCY

- In the event an initial statement to the media is required from the Company in response to an emergency or crisis event, the statement will be provided by the designated Spokesperson as identified by the Chief Executive Officer.
- The statement will then be immediately reported by telephone to the President & CEO and the appropriate Division Vice President.
- Local responses for areas other than head office will be immediately referred to the Incident Commander in such office, who will then contact Chief Executive Officer.

WE MANAGE DATA AND USE INFORMATION TECHNOLOGY CAREFULLY

We are responsible for safeguarding our assets against all forms of evolving cyber threats and the correct use of our information technology. We are committed to protecting our stakeholders' interests by putting in place strategies to ensure data integrity and confidentiality.



All people, including Alypz’s employees, trainee, committee members, partners, consultants, personnel of external bodies or individual acting on the Alypz’s behalf, shall keep confidential all information obtained or created during the performance of Alypz’s activity, except if required by Personal Data Protection Act 2010.

DEFINITION

Data Subject

Individual who is the subject of personal data and for the purposes of this Policy includes (without limitation) the individuals identified as below;

- a. Customers of Alypz (including former customers);
- b. Authorized representatives of customers
- c. Identified potential customers of Alypz;
- d. Applicants to be customers of Alypz, whether successful or not;
- e. Non-Customers who utilize facilities and services provided by Alypz; and
- f. Individuals who entered into ancillary agreements with Alypz (e.g., guarantors)

Personal Data

Our people including third party or individual acting on the Alypz’s behalf shall protect below data:

- a. The personal particulars of an individual, whether obtained from the individual directly or derived from any other data that Alypz has access to;
- b. The details an individual provides on an application to obtain a product or service;
- c. The details of an individual’s account balance information, credit history, and income.
- d. The details of an individual’s ownership of properties or assets;
- e. The employment information of an individual.
- f. The details of obtained through assessment;
- g. The details of individuals and their browsing session(s) captured via the use of website cookies;
- h. The details of the individual as listed within a manual or electronic database.

DATA PROTECTION PRINCIPLE

General principle

We never process personal data unless where processing is necessary for the following purposes:

- a. with consent from Data Subject
- b. performance of contract with a Data Subject; or
- c. fulfilment of a pre-contractual request of Data Subject; or
- d. to comply with any non-contractual legal obligation; or
- e. to protect the vital interests of Data Subject; or
- f. for administration of justice; or
- g. exercising functions conferred by law.

Notice and Choice Principle

We shall make available a Privacy Notice to Data Subjects prior to or as soon as possible after collection of their personal data. Privacy Notice is a publicly available statement clearly expressing the privacy practices of how a Data User uses, manages, discloses, and provides Data Subjects with access to personal data collected.

Disclosure Principle

We only disclose personal data to third party where:

- a. the disclosure is for a purpose directly related to the primary purpose declared in the Privacy Notice at the point of the data collection; or
- b. the disclosure has been consented to by the Data Subject; or
- c. the disclosure is necessary for the purpose of preventing or detecting a crime, investigations; or
- d. we acted in the reasonable belief that it had in law the right to disclose the data to the other party; or
- e. we acted in the reasonable belief that it would have had the consent of the Data Subject if the Data Subject had known of the disclosure of the personal data and the circumstances of such disclosure; or
- f. the Minister determines the disclosure as being justified in the public interest.

Security Principle

We shall take ‘practical steps’ to protect personal data from any loss, misuse, modification, unauthorized or accidental access or disclosure, alteration or destruction.

Retention Principle

We shall not hold personal data longer than is necessary for the fulfilment of the purposes for which it was collected. Upon the purpose being fulfilled, Alypz is required to permanently destroy/delete the personal data

Data Integrity Principle

We take “reasonable steps” to ensure that the personal data processed by the Data User is “accurate, complete, not misleading and kept up-to- date”, in relation to the purpose as well as the directly related purpose.

Access Principle

Data Subject shall be given the right to request access to his/her personal data held by Alypz and to correct his/her personal data where the personal data is inaccurate, incomplete, misleading or not up-to-date, unless the request is one which Alypz may deny as stated in the Act



Alypz is committed to maintaining a secure and resilient cyber environment. We prioritize the confidentiality, integrity, and availability of our data and systems. Through continuous monitoring, employee training, and adherence to best practices, we strive to protect against cyber threats and ensure a safe digital experience for all stakeholders as required by Cyber Security Act 2024.

GENERAL USE AND OWNERSHIP

- All proprietary information and electronic files created, sent, received, or stored on Alypz owned, leased, or administered equipment or otherwise under the custody and control of Alypz are the property of Alypz.
- You are responsible for all electronic activities initiated by you (e.g., email, web browsing, application usage) and electronic content stored on the company IT assets.
- End Access requests must be authorized and submitted from departmental supervisors for employees to gain access to computer systems. Authorized users are accountable for all activity that takes place under their username.
- Authorized users should be aware that the data and files they create on the corporate systems immediately become the property of Alypz. Because of the need to protect Alypz's network, there is no guarantee of privacy or confidentiality of any information stored on any network device belonging to Alypz.
- For security and network maintenance purposes, authorized individuals within the Alypz IT Department may monitor equipment, systems, and network traffic at any time.
- Alypz's IT Department reserves the right to audit networks and systems on a periodic basis to ensure compliance with this policy.
- Alypz's IT Department reserves the right to remove any non-business-related software or files from any system. Examples of non-business-related software or files include, but are not limited to: games, instant messengers, pop email, music files, image files, freeware, and shareware.

PRIVACY

- Electronic files created, sent, received, or stored on Alypz owned, leased, or administered equipment, or otherwise under the custody and control of Alypz are not private and may be accessed by Alypz IT employees at any time without knowledge of the user, sender, recipient, or owner.
- Electronic file content may also be accessed by appropriate personnel in accordance with directives from Human Resources or the CEO or Data Protection Officer.

INCIDENTAL USE

You only allow for limited personal use of Alypz technology or resources if;

- a. Does not relate to outside business activities;
- b. Does not result in Alypz incurring undue costs;
- c. Does not interfere with Alypz's business or our responsibilities and performance at Alypz.

UNACCEPTABLE USE OF TECHNOLOGY

The following activities are prohibited by users, with no exceptions:

- Violations of the rights of any person or company protected by copyright, trade secret, patent, or other intellectual property, or similar laws or regulations, including, but not limited to, the installation or distribution of "pirated" or other software products that are not appropriately licensed for use by Alypz.
- Unauthorized copying of copyrighted material including, but not limited to, digitization and distribution from copyrighted sources, copyrighted music, and the installation of any copyrighted software for which Alypz or the end user does not have an active license is prohibited. Users must report unlicensed copies of installed software to IT.
- Introduction of malicious programs into the network or server (e.g., viruses, worms, Trojan horses, e-mail bombs, etc.).
- Revealing your account password to others or allowing use of your account by others. This includes family and other household members when work is being done at home.
- Using a Alypz computing asset to actively engage in procuring or transmitting material that is in violation of sexual harassment or hostile workplace laws.
- Attempting to access any data, electronic content, or programs contained on Alypz systems for which they do not have authorization, explicit consent, or implicit need for their job duties.
- Installing any software, upgrades, updates, or patches on any computer or information system without the prior consent of Alypz IT.
- Installing or using non-standard shareware or freeware software without Alypz IT approval.
- Installing, disconnecting, or moving any Alypz owned computer equipment and peripheral devices without prior consent of Alypz's IT Department.
- Purchasing software or hardware, for Alypz use, without prior IT compatibility review.
- Circumventing user authentication or security of any host, network, or account.
- Interfering with, or denying service to, any user other than the employee's host (for example, denial of service attack).
- Using any program/script/command, or sending messages of any kind, with the intent to interfere with or disable a user's terminal session, via any means, locally or via the Internet/Intranet/Extranet.



PROTECT PERSONAL AND COMPANY DEVICES

- The term “Mobile Device” refers to an easily portable computing device, that is typically process and store information and have an ability to connect to a network. The most common Mobile Devices are laptops, tablets, smartphones and wearables. Mobile Devices are designated as either “The Company Owned” or “Privately Owned” or Bring Your Own Device (BYOD)”.
- Usage of personal equipment to store any data and confidential information is hereby prohibited as to preserve data movement between company and Data Subjects unless in emergency situations. You are required to use company cloud services to store private and confidential data. Cloud services will be determined by IT Department of company.
- Data that is stored in company PC will not be destroyed in case of termination or resignation. Once the process of termination or resignation started, your Head of Department will contact you to backup all your data to company cloud services.
- Only authorised devices are permitted for professional use. Only the owner of the device are permitted to use approved BYODs to access the company's resources. Users must not grant access to their devices to unauthorised individuals.
- You or the owner of the mobile device must:
 - a. Allow Aлыпz to install Aлыпz’s mobile device management software onto his/her device.
 - b. Employ reasonable physical security measures for the mobile device and is expected to secure it whether or not it is actually in use or being carried.
 - c. Inform Aлыпz, upon termination of employment, of any approved mobile devices contract or agreement, to be submitted for inspection prior to departure, if required.
- You shall keep both your personal and company-issued computer, tablet and cell phone secure by:
 - a. Keep all devices password protected.
 - b. Choose, install and upgrade firewalls, antivirus software, antimalware software, access authentication systems.
 - c. Not leaving your devices exposed or unattended.
 - d. Turn off screens and lock your devices when leaving your desks.
 - e. Install security updates of browsers and systems monthly or as soon as stable updates are available.
 - f. Log into company accounts and systems through secure and private networks only as per “Remote Access” policy.
 - g. Report stolen or damaged equipment as soon as possible to IT Specialist.
 - h. Avoid accessing internal systems and accounts from other people’s devices or lending your own devices to others

PASSWORD POLICY

- Users of the company information systems are personally responsible for the use of their account, creating and protecting passwords that grant them access to resources and must:
 - a. Select lengthy (within reason) – minimum 8 characters;
 - b. Select complex passwords with alpha numeric combination, and avoid use of simple passwords such as the name of the service itself, your name, “PASSWORD”;
 - c. Use Multi-Factor authentication where possible;
 - d. Change their password at first login;
 - e. Change their password as soon as possible if they know or suspect that their account has been compromised;
 - f. Keep passwords secure, and not reveal them under any circumstances;
 - g. Don't reuse old passwords or passwords used for other purposes. e.g., social media.
 - h. Not attempt to use any account other than their own;
 - i. Not share their user account with other individuals; and
 - j. Change all account passwords at once when a device is stolen or when account is compromised.

REMOTE ACCESS

- While working remotely or at offsite location, you:
 - a. Must never provide your login or email password to anyone, not even family members;
 - b. Must keep conversations confidential. Do not discuss work issues at public area;
 - c. Must not use personal email or cloud storage accounts for work;
 - d. Must make sure your remote WiFi connection (home or otherwise) is password protected;

DATA INTEGRITY AND SECURITY

To ensure the integrity and security of our information system and assets, the following requirements must be observed with respect to the use of all Mobile Devices.

- a. Mobile Device Management software should be installed and enabled and must not be removed or tampered with. This software enables the IT department to enforce minimum security features on mobile devices.
- b. Mobile devices must not be used to store unencrypted passwords.
- c. Mobile devices should never be used to store sensitive information, such as health information about clients.
- d. Mobile devices carrying confidential the company information must not be left unattended and should be physically secured.
- e. You must not bypass access controls on device operating systems added by suppliers.
- f. Mobile device use should be in accordance with all relevant laws. For the avoidance of doubt, the company will not pay for any fines imposed due to breach of laws.

ANTIVIRUS

- Malware threats are managed to minimize the amount of downtime realized by Alypz's systems and prevent risk to critical systems and member data.
- All computer devices connected to the Alypz network and networked resources shall have anti-virus software installed and configured so that the virus definition files are current and are routinely and automatically updated. The anti-virus software must be actively running on these devices.
- The virus protection software must not be disabled or bypassed without IT approval.
- The settings for the virus protection software must not be altered in a manner that will reduce the effectiveness of the software.
- The automatic update frequency of the virus protection software must not be altered to reduce the frequency of updates.
- Each file server, attached to the Alypz network, must utilize Alypz IT approved virus protection software and setup to detect and clean viruses that may infect Alypz resources.
- Each e-mail gateway must utilize Alypz IT approved e-mail virus protection software.
- All files on computer devices will be scanned periodically for malware.
- Every virus that is not automatically cleaned by the virus protection software constitutes a security incident and must be reported to the Service Desk.
- If deemed necessary to prevent propagation to other networked devices or detrimental effects to the network or data, an infected computer device may be disconnected from the Alypz network until the infection has been removed.
- To avoid from virus infections, you should;
 - a. NEVER open any files or macros attached to an e-mail from an unknown, suspicious, or untrustworthy source. Delete these attachments immediately then remove them from the Trash or Recycle Bin.
 - b. Delete spam, chain, or other junk mail without opening or forwarding the item.
 - c. Never download files from unknown or suspicious sources.
 - d. Always scan removable media from an unknown or non-Alypz source (such as USB from a vendor) for viruses before using it.
 - e. Back up critical data on a regular basis and store the data in a safe place. Critical Alypz data can be saved to network drives and are backed up on a periodic basis. Contact the Alypz IT Department for details.

SYSTEM AND NETWORK SECURITY

- Security Incidents are adverse events which pose a threat to the company's information systems and services. Security incidents can originate from intentional (deliberate actions against an information system) or unintentional actions (human error). Examples of potential security incidents include abnormal computer behaviour, which may be caused by a computer virus, malware, worm, a non-escorted guest, disclosure of information to an unauthorised person, lost or stolen physical access cards, removable media, laptops and passwords and unauthorised access to an information system or physical premise.
- You must not:
 - a. attempt to compromise the security of a computer;
 - b. export software, technical information, encryption software or technology, in violation of international or regional export control laws. The appropriate management should be consulted prior to export of any material that is in question;
 - c. introduce malicious programs into the network or server (e.g. viruses, worms, Trojan horses, email bombs, etc.);
 - d. breach security controls or disrupt network communication (except for IT or security staff responsible for maintenance and troubleshooting). For the purposes of this section, "disruption" includes, but is not limited to, network sniffing, pinged floods, packet spoofing, denial of service, and forged routing information for malicious purposes;
 - e. port scanning or security scanning is expressly prohibited with the exemption of the IT team;
 - f. execute any form of network monitoring that will intercept data not intended for the end-user host, unless this activity is a part of your normal job/duty;
 - g. circumvent user authentication or security of any host, network, or account;
 - h. introduce honeypots, honeynets, or similar technology on the company network (with the exception of the Security team or equivalent);
 - i. interfere with or deny service to any user other than the company's host (for example, denial of service attack);
 - j. use any program/script/command, or sending messages of any kind, with the intent to interfere with, or disable, a user's terminal session, by any means, locally or via the internet/intranet/extranet'

KEEP EMAILS SAFE

- E-mail is to be used for business purposes and in a manner that is consistent with other forms of professional business communication.
- Anti-spoofing practices have been initiated for detecting spoofed emails. You should be diligent in identifying a spoofed email. If email spoofing has occurred, IT must be immediately notified to IT Specialist.
- Incoming email must be treated with the utmost care due to the inherent information security risks. Alypz uses an anti-virus application to identify malicious code(s) or files.
- To keep your email safe, you must not:
 - a. use corporate email for personal purposes.
 - b. sending e-mail that may be deemed intimidating, harassing, or offensive. This includes, but is not limited to: abusive language, sexually explicit remarks or pictures, profanities, defamatory or discriminatory remarks regarding race, creed, colour, sex, age, religion, sexual orientation, national origin, or disability.
 - c. Using e-mail for the purposes of sending SPAM or other unauthorized solicitations.
 - d. Violating copyright laws by illegally distributing protected works.
 - e. Sending e-mail using another person's e-mail account, except when authorized to send messages for another while serving in an administrative support role.
 - f. Creating a false identity to bypass policy.
 - g. Forging or attempting to forge e-mail messages.
 - h. Using unauthorized e-mail software
 - i. Knowingly disabling the automatic scanning of attachments on any Alypz personal computer.
 - j. Knowingly circumventing e-mail security measures.
 - k. Sending or forwarding joke e-mails, chain letters, or hoax letters.
 - l. Sending unsolicited messages to large groups, except as required to conduct Alypz business.
 - m. Sending excessively large messages or attachments.
 - n. Knowingly sending or forwarding email with computer viruses.
 - o. Setting up or responding on behalf of Alypz without management approval.
 - p. follow web-links or instructions provided by email, unless certain of their origin and function;
 - q. send messages or download content that support illegal or unethical activities;
 - r. change the security settings of their email software or Internet browser on a company device (e.g. laptop, desktop);
 - s. send sensitive information via unencrypted email;
 - t. send emails containing passwords in clear text, or account information such as log-on ID and password combinations.

TRANSFER DATA SECURELY

- You shall avoid transferring sensitive data to other devices or accounts unless necessary. When mass transfer of such data is needed, you shall ask IT Specialist for help.
- You only share confidential data over the company network/ system and not over public Wi-Fi or private connection.
- You shall ensure that the recipients of the data are properly authorized people or organizations and have adequate security policies.
- You shall report scams, privacy breaches and hacking attempts to IT Specialist
- All issues are investigated promptly, resolved and companywide alert shall be sent when necessary.
- We train our IT specialist so that they can handle scams, breaches and malware for better protect of our infrastructure and encourage our people to reach out to them with any questions or concerns.

SOCIAL MEDIA USE

- You are trusted to act responsibly when using social media sites such as Facebook, Twitter, wikis, blogs, YouTube, and LinkedIn.
- The company information must only be shared over official, authorised communication channels. The company information must not be shared on social media sites.
- When accessing social media sites on Alypz computers or devices:
 - a. You may be subject to logging and monitoring checks;
 - b. Access may be restricted to social media sites; and
 - c. Inappropriate social media websites will be blocked.
- When accessing or contributing on social media sites, you must:
 - a. Not place comments representing or giving the impression of representing Alypz, unless explicitly authorised to do so.
 - b. Exercise good judgement when blogging or posting.
 - c. Not post or view material that is illegal, obscene, defamatory, threatening, harassing, discriminatory, racist, or hateful to another person or entity.
 - d. Be aware that information hosted on social media is unverified and must not be used without confirming its authenticity for decision making.
- You shall not send company information via unauthorised messaging platforms based on its classification and sensitivity (e.g., WhatsApp, Facebook Messenger, WeChat, etc.) and must only be transmitted using Alypz approved and authorised messaging systems.



MONITOR ALL ACCOUNTS ACTIVELY

- Data, computer accounts are the means used to grant access to Aлыпz's information systems. This include created for Aлыпz by the external parties for information sharing.
- Information system user accounts are to be constructed so that they enforce the most restrictive set of rights/privileges or accesses required for the performance of tasks associated with an individual's account. Further, to eliminate conflicts of interest, accounts shall be created so that no one user can authorize, perform, review, and audit a single transaction.
- All accounts created must have an associated written request and signed management approval that is appropriate for the Aлыпz system or service.
- All accounts must be uniquely identifiable using the assigned username.
- All account modifications must have a documented process to modify a user account to accommodate situations such as name changes and permission changes. A list of accounts, for the systems they administer, must be provided when requested by authorized Aлыпz management.
- Shared accounts on Aлыпz information systems are not permitted.
- All default passwords for accounts must be constructed in accordance with the Password Policy.
- Concurrent connections may be limited for technical or security reasons.
- All information system accounts will be actively managed. Active management includes the acts of establishing, activating, modifying, disabling, and removing accounts from information systems.
- Information system accounts are to be reviewed monthly to identify inactive accounts. If an employee or third-party account is found to be inactive for 30 days, the owners (of the account) and their manager will be notified of pending disablement. If the account continues to remain inactive for 15 days, it will be manually disabled.
- You must regularly manage documents in shared locations and delete files and folders that are no longer required.
- All accounts must be disabled immediately upon notification of any employee's termination

DISPOSE HARDWARE AND ELECTRONIC MEDIA SECURELY

- Hardware and electronic media disposition is necessary at Aлыпz to ensure the proper disposition of all non-leased Aлыпz IT hardware and media capable of storing information. Improper disposition can lead to potentially devastating fines and lawsuits, as well as possible irreparable brand damage.
- Aлыпz owned surplus hardware, obsolete machines, and any equipment beyond reasonable repair or reuse, including media, are covered by this policy.
- Where assets have not reached end of life, it is desirable to take advantage of residual value through reselling, auctioning, donating, or reassignment to a less critical function.

- Where assets have not reached end of life, it is desirable to take advantage of residual value through reselling, auctioning, donating, or reassignment to a less critical function.
- Aлыпz's surplus or obsolete IT assets and resources (i.e. desktop computers, servers, etc.) must be discarded according to legal requirements and environmental regulations through the appropriate external agents and Aлыпz's upgrade guidelines.
- All disposition procedures for retired IT assets must adhere to company approved methods.
- The IT Department is responsible for backing up data from IT assets slated for disposition (if applicable) and removing company tags and/or identifying labels. IT is responsible for selecting and approving external agents for hardware sanitization, reselling, recycling, or destruction of the equipment. IT is also responsible for the chain of custody in acquiring credible documentation from contracted third parties that verify adequate disposition and disposal that adhere to legal requirements and environmental regulations.
- IT Department shall ensure that IT assets are disposed safely and securely. It is imperative that all dispositions are done appropriately, responsibly, and according to IT lifecycle standards, as well as with Aлыпz's resource planning in mind.
- The company IT retains the right to delete any personal media files stored in shared locations. The local storage of data on a personal device (e.g. laptops, desktops, mobile phones and tablets) will not be backed up, and the loss of any information (in the event of a device failure) will be the responsibility of the user.
- You must take secure backups of files stored locally on personal devices (such as laptops, desktops, mobile phones and tablets) that are not backed up and will not be recoverable in the event that a device is exchanged, or a local storage fails or is erased.

ACTION TO SECURITY INCIDENT

- If you observe any unfamiliar activity on your workstation, you shall immediately disconnect the system from the network and report the incident to the IT service desk or their immediate supervisor (or equivalent).
- You shall immediately report any unfamiliar activity or suspected security incident to the Aлыпz's IT service desk and comply with the directions given to facilitate a quick response, repair of the system, restoring the service and analysis of the incident.
- You must not:
 - a. perform an action (e.g., delete system files) to eradicate or contain a suspected security incident unless explicitly instructed by the Aлыпz's IT service desk or security team; and
 - b. disclose information relevant to security incidents to unauthorised entities.
- Reporting then should be in tandem with Aлыпz *Cyber Security Incident Management Guidelines*.

WE COMMIT TO HEALTH AND SAFETY

Our care and commitment to health and safety is integral to the way we do business, and it starts with each one of us. We are committed to a workplace where all people are protected; because everyone deserves to feel safe and valued



Employee and everyone undertaking work for Alypz (onsite or otherwise) must not be impaired by illegal or legal drugs, including alcohol. Our commitment extends to ensuring that employees are both physically and mentally fit to carry out their duties.

MANAGEMENT COMMITMENT

Physical Fitness

- We are committed to providing a place of work and systems of work which minimise risks arising from lack of fitness for work.
- We encourage all employees to embrace healthy lifestyles, incorporating regular exercise and balanced nutrition to support their physical well-being and overall performance.

Medical Fitness

- In certain circumstances, employees may be required to undergo medical assessments, including fitness-for-duty evaluations, as deemed necessary by Alypz to ensure their ability to safely perform their duties.

Mental Health

- We are steadfast in our commitment to creating an environment that nurtures mental well-being.
- We urge our people to actively seek support and utilize available resources to address mental health challenges, while also proactively managing stress and workload to foster a healthier work environment.

Alcohol and Drug Consumption

- We ensure our employee not impaired by illegal or legal drugs, including alcohol, while at work or when conducting Alypz business pursuant to *Alcohol and Drug Policy*.

Personal Protective Equipment

- We are committed in ensuring a safe and healthy working environment for our employees and to ensure due consideration is given to safety. This include the purchase and issue of PPE. In line with Alypz safety policy, we will provide:
 - a. Training in the correct use of PPE where applicable,
 - b. Equipment which conforms to the relevant International Standard.
 - c. Specific safety clothing and equipment such as coveralls, hard hats, eye protection and earmuff or plugs;
 - d. Requests for specific safety items outside this list will be assessed on an individual basis, as required;
 - e. Other client site specific PPE will be included in that client's induction.

OUR PEOPLE COMMITMENT

- You responsible for carrying out our duties in such a way that health and safety is not compromised by lack of fitness for work.
- You have obligation to:
 - a. Report problems with fitness for work;
 - b. Consult with their supervisor or manager if they may be affected by substances such as prescription or over the counter medication which could impair their performance at work, before commencing work;
 - c. Contribute to the assessment of risks;
 - d. Contribute to the design and implementation of control measures, and comply with such measures (e.g. return to work program);
 - e. Manage individual factors which affect fitness for work (e.g. ensure adequate rests between shifts, control alcohol and drug use);
 - f. Ensure they can carry out their duties in a safe manner;
 - g. Protect yourself by applying the provided PPE while performing tasks as needed.
 - h. Seek treatment and support for health conditions affecting their fitness for work.

RETURN TO WORK PROGRAM

- We ensure that employees found to be unfit for work are managed in a fair and effective manner and shall assist and encourage rehabilitation of any employee who suffers impairment of their ability to perform their role.
- We recognise that employees may need support for fitness and ensure the employee is ready to return to work.
- We discuss and assess if our people ready to return to work need support.
- We consider any recommendations from the employee's doctor or occupational health services.
- We discuss reasonable adjustments for disabled employees



POLICY

ALCOHOL AND DRUG

Alypz recognizes that the use and abuse of alcohol/alcoholic beverages and drugs will affect the employees's ability to perform work properly and will have serious adverse effect on safety, efficiency and productivity. Therefore, we strictly prohibited the use, possession, distribution or trafficking alcohol/alcoholic beverages and drug at any work locations.

YOUR COMMITMENT

- The Alcohol and Drug Policy is to maintain a safe, healthy and productive working environment. This policy covers the use (which include possessing, distributing or sale) of alcohol/alcoholic beverages or drugs in work locations.
- You shall not report for work or carry out their duties in the course of your employment under the influences of alcohol or drugs of all or any of the above substances.
- We are not allowing our employee to drive vehicle or operate any equipment under the influence of drug and alcohol.
- If you are taking medication which renders you unable to carry out your duties in a manner that will jeopardise the safety of yourself and/or the other employees, you must inform your relevant supervisor or the Human Resource accordingly. However, the Company reserve the right to refuse the entry of prescribed drugs if the use of such drugs will affect the safety and efficiency of work environment.
- If you know or suspect that an employee is using, taking, consuming or dealing with any prohibited substances, you must inform your immediate supervisor or the Human Resource immediately. The Company also encourages employees to bring their personal drinking or drug problem to the attention of your Supervisor (who shall inform the Human Resource accordingly without delay). The Company may at its sole discretion and without prejudice to its rights of dismissal, render assistance to an employee who voluntarily submits himself/herself for treatment for such a problem including rehabilitation at an appropriate centre for treatment.
- The Company may from time to time, at its sole discretion, require you to be randomly tested for the use of illegal drugs and substances. This may involve the testing of breath or body fluids. The primary aim is to discourage abuse and offer help and access to confidential treatment. Refusal by the employee to undergo such a test may warrant appropriate disciplinary action to be taken by the Company as it deems fit.
- The Human Resource Department shall be responsible for determining the details such as misconduct or problem and the appropriate action to be taken against the said employee, which may include, without limitation, reprimand, suspension or dismissal. The Human Resource may, if it considers appropriate in the circumstances, submit a report of such misconduct to the management together with its recommendation of the appropriate disciplinary action to be taken against the said employee.

DRUG AND/OR ALCOHOL TESTING

Selection

- Not all employees will be asked to submit to drug and alcohol testing. Only those employees who are suspected, voluntary declared, taking medication or those deal with high-risk job e.g., offshore are subject to drug and alcohol testing.

Written Notice

- Before being asked to submit to a drug and/or alcohol test, the employee will receive written notice of the request or requirements.

Licensed Laboratories

- Any drug and/or alcohol testing required or requested by the Company will be conducted by a laboratory licensed by the state.

Notice Of Results

- Human Resources Department will notify the employee of the results within 24 hours after it receives them from the laboratory. To preserve the confidentiality, the employee will be notified by email whether the test was negative or further step required if confirmed positive.

Positive Test Results

- The employee will be given the opportunity to explain the positive result following the employee's receipt of the test result. In addition, the employee may have the same sample retested at a laboratory of the employee's choice.

Adverse Employment Action

- If there is reason to suspect that the employee is working while under the influence of an illegal drug or alcohol, the employee will be suspended without pay until the results of a drug and alcohol test are made available to Human Resources by the testing laboratory. Where drug or alcohol testing is part of a routine physical or random screening, there will be no adverse employment action taken until the test results are in.

Confidentiality

- We will make every effort to keep the results of drug and alcohol tests pursuant to confidentiality policy.
- The results of drug testing in the workplace will not be used against the employee in any criminal prosecution.

Costs

- The Company will pay the cost of any drug and alcohol testing including retesting of confirmed positive results. Any additional tests that the employee requests will be paid for by the employee.



POLICY SMOKING AND VAPING

Alypz recognizes the right of all employees to work in a smoke/vapor free environment. Alypz shall ensure that everyone is protected from the dangers of smoke/vapor in work and rest areas.

OUR COMMITMENT

- This policy covers the smoking of any tobacco products and the use of oral tobacco products, “spit” tobacco and electronic nicotine delivery system – known as e-cigarettes, e-cigars, e-hookahs and e-pipes.
- This policy applies to anyone working or staying in Alypz premises.
- To protect and enhance indoor air quality, as well as the health and well-being of all employees, contractors and visitors, we prohibit smoking and vaping in all enclosed area within any work sites including common work areas, training rooms conference and meeting rooms, office, hallways, cafeterias, stairs, employer-owned or leased vehicles and other closed ventilated areas.
- The smoking is strictly forbidden within the Company premises and within 3 meters distance from the premises and at any areas where the “SMOKING IS PROHBITED” signage is displayed.
- Smoking and vaping shall only be permitted in designated smoking areas outside the office building.
- All materials used for smoking including cigarette butts and matches shall be extinguished and disposed-off in appropriate containers.

Non-Compliance

- If you are found smoking in contravention of this policy, you will be subjected to disciplinary action in accordance with the Company's disciplinary procedure pursuant to the Code of Conduct in force.
- A breach of this policy will be treated as a gross misconduct, liable to summary dismissal without show cause or Domestic Inquiry, where the same employee has been given three (3) written warnings throughout his/her employment relating to the same/similar case.
- Where smoking constitutes an immediate safety hazard/fire threat at combustible site/facilities such behaviour will also be treated as gross misconduct and could render the employee liable to summary dismissal without notice.
- If an external party such a client, customer, contractor, agency worker or supplier does not comply with this policy, they will first be warned that they are committing an offence and requested to immediately refrain from smoking and if they refuse, they will then be asked to leave or be escorted out from the premises immediately.
- The Company will not provide the employee any form assistance including but not limited to legal advice or support under these circumstances.

WE TREAT PEOPLE WITH DIGNITY AND RESPECT

We actively protect and uphold the human rights of our people, the people who we work with and the people in our communities.
The rights are based on dignity, fairness, equality, respect and independence.



Alypz is committed to respecting and upholding human rights across our business practices and supply chains. We believe that everyone should be treated with dignity and respect, and we are working to ensure our business activities and practices are aligned with the United Nations Guiding Principles on Business and Human Rights.

OUR PEOPLE

- We respect and support the dignity, wellbeing and human rights of our employees and believe that everyone must be treated fairly and without discrimination.
- We are built on a culture of trust and direct engagement, where all Alypz employees are encouraged to communicate openly with management regarding working conditions.
- We respect the rights of employees to freedom of Our Partners.
- We seek to engage partners who uphold the values. Our partners include suppliers, customers, contractors and sub-contractors, and all community stakeholders, support the elimination of all forms of forced or association and voluntary collective bargaining in accordance with local laws.
- It is expected that all employees understand and follow our Code of Conduct.

OUR WORKPLACE

- We believe that a culture of inclusion is essential for a respectful workplace, and we recognise and value the different skills, experiences, perspectives, and backgrounds that our people bring to the Company.
- We have a commitment to providing safe and healthy working conditions for our people and the partners who choose to work with us.
- We pay at least the legal minimum wage or higher, provide all legally and contractually mandated benefits and reward overtime at a premium. Wages are paid in full and through monetary means.
- We are committed to building leadership awareness and capability on identifying human rights issues.

OUR COMMUNITIES

- We believe that all communities have the right to a safe and healthy environment, and we are committed to respecting this right.
- We seek proactive feedback from community groups to ensure our relationships remain strong and their voices are clearly heard and engage with all stakeholders as required.
- We recognise the importance of the diverse cultural heritage in our communities, and the rights of all Indigenous peoples.

OUR PARTNERS

- We seek to engage partners who uphold the values expressed in Our Bond and this Human Rights Policy. Our partners include suppliers, customers, contractors and sub-contractors, and all community stakeholders. We support the elimination of all forms of forced or compulsory labour and the abolition of the worst forms of child labour and require our partners to do the same.
- We are committed to ensure that all security providers respect human right and public freedoms.
- We specifically view the performance of our suppliers as an integral part of Alypz's value chain and therefore expect them to meet high legal, ethical, environmental and employment standards.

OUR APPROACH

Due Diligence

- Through due diligence and an appropriate remedy and governance process we aim to identify, assess, remedy, and track adverse impacts on human rights in which we may be involved.

Governance

- The Board maintains oversight of all human rights issues to ensure our expectations as defined by the values expressed in Our Bond are realised wherever we operate.

Alypz is committed to encouraging equality, diversity and inclusion among our workforce, and eliminating unlawful discrimination includes factors such as religion, race, ethnic origin, language, gender, sexual orientation, disability, age or any other potential factor of difference. The aim is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to deliver their best.

OUR COMITMENT

- Create an environment in which the individual differences and contributions of all team members are recognized and valued.
- Create a working environment that promotes dignity and respect for every employee.
- Attract and retain a skilled and diverse workforce that best represents the talent available in the communities in which our assets are located and our employees reside
- Ensure appropriate selection criteria based on diverse skills, experience and perspectives is used when hiring new staff. Job specifications, advertisements, application forms and contracts will not contain any direct or inferred discrimination.
- Ensure that applicants and employees of all backgrounds are encouraged to apply for and have fair opportunity to be considered for all available roles.
- Provide, to the greatest extent possible, universal access to safe, inclusive and accessible premises that allow everyone to participate and work to their full potential.
- Comply with equal opportunity and anti-discrimination legislation
- Not tolerate any form of intimidation, bullying, victimisation, vilification or harassment and to take disciplinary action against those who violate this policy.
- Provide training, development and advancement opportunities for all staff based on merit.
- Encourage anyone who feels they have been discriminated, to express their concerns so that we can take corrective action.
- Encourage employees to treat everyone with dignity and respect.
- Regularly review all our employment practices and procedures so that fairness is maintained at all times.
- Ensure to the greatest extent possible that all events that ALYPZ organizes or participates on include representation of each gender

Alypz is fully committed to a safe, healthy and harassment-free work environment for all employees and believes that every employee should be treated with respect and dignity.

HARRASSMENT

- Harassment means any verbal, written or physical conduct that is commonly known or ought reasonably to have been known to be unwelcome, inappropriate or otherwise offensive to a person, and that such conduct demeans, humiliates, threatens or embarrasses him/her or otherwise violates his/her dignity.
- Harassment may be motivated by one of these grounds: race or ethnicity; skin colour; religion; sex or gender; place of origin; ancestry; culture; age; mental or physical disability; sexual orientation; family, marital or social status; economic or financial background; power disparity; and political affiliation.
- Alypz does not tolerate the harassment of its employees in the workplace. In particular, the following are contrary to this Policy and therefore prohibited:
 - a. any employee engaging in conduct deemed to be harassment, or encouraging such conduct by others; and
 - b. any form of retaliation directed against an employee or third party who either complains about harassment or who participates in any investigation concerning harassment. Retaliation includes dismissal, demotion, unwanted transfer, denial of opportunities within Alypz or harassment as a result of the complaint or participation in the investigation.
- Alypz's zero-tolerance position on harassment in the workplace applies to all aspects of employment:
 - a. harassing another is a breach of a term or condition of employment;
 - b. the career development of an employee will not be compromised as a result of the actions of a harasser; and
 - c. employees are expected to behave in a non-threatening and non-offensive manner
- Breach of this Policy is considered employee misconduct and may result in disciplinary measures taken, including dismissal. Alypz is responsible for taking necessary action against harassment, regardless of whether the conduct complained of was sanctioned or specifically forbidden.
- Harassment has the purpose or effect of:
 - a. creating an intimidating, hostile or offensive workplace;
 - b. interfering with the performance of an employee's functions, duties and responsibilities; or
 - c. affecting conditions of employment or compensation

Racial Harassment

Harassment in the work conditions or working environment on the basis of race is intended to cause, or has the effect of causing physical, mental or emotional distress at the workplace. It is also a form of discrimination

Sexual Harassment

- Employees are strictly prohibited from engaging in any form of harassment, humiliation and intimidation of a sexual nature.
- Sexual harassment covers any unwanted conduct of a sexual nature having the effect of verbal, non-verbal, visual, psychological or physical harassment between individuals of different sexes or of the same sex.
- Sexual coercion - is sexual harassment that results in some direct consequence to the victim's employment.
- Sexual annoyance - the second type of sexual harassment is sexually related conduct that is offensive, hostile or intimidating to the recipient, but nonetheless has no direct link to any job benefit.

Other Type of Harassment

- The harassment also include the following types but not limited to:
 - a. abuse of Authority
 - b. insulting behaviour or comments
 - c. physical abuse, threats and assaults;
 - d. derogatory remarks, slurs, epithets or language;
 - e. unacceptable, annoying or unwanted nicknames or negative stereotyping;
 - f. pornographic or otherwise offensive signs, images, pictures or materials displayed;
 - g. lewd, leering, obscene or suggestive gestures;
 - h. unwanted or inappropriate physical contact that is non-consensual, such as kissing, pinching, stroking, fondling, patting, touching and brushing up against a person;
 - i. derogatory or offensive pranks, horse-play and practical jokes;
 - j. isolation or exclusion of a person from others;
 - k. bullying and victimisation i.e., body shaming, unreasonable and persistent criticism or humiliation, unreasonable distribution of work and responsibilities;
 - l. inappropriate inquiries or comments about a person's sex life, religious or cultural norms, sexual orientation, family background, source of income or lifestyle;
 - m. psychological harassment that may harm a person's psychological well-being that includes belittling or trivialising a person's thoughts, or discrediting or spreading rumours about the person; and
 - n. cyberbullying or online harassment that includes sharing of humiliating information, spreading rumours or lies about a person using electronic means.

Alypz's dress code policy should be used to help employees present themselves in a professional way to customers, clients, and colleagues as we believe that our appearance reflects ourselves and Alypz.

DRESS CODE

- Dress, grooming and personal cleanliness standards contribute to the morale of all employees and have an impact on the company's image. Indeed, Alypz want employees who represent the organization or who work on the company's premises to have a professional look and to wear appropriate clothing for a workplace.
- During business hours or when representing Alypz, you are expected to present a clean, neat, and tasteful appearance. You should dress and groom yourself according to the requirements of your position and accepted social standards. This is particularly true if your job involves dealing with customers or visitors in person.
- Your supervisor or department head is responsible for establishing a reasonable dress code appropriate to the job you perform. Consult your supervisor if you have questions as to what constitutes appropriate appearance. Where necessary, reasonable accommodation may be made to a person with a disability.
- Without unduly restricting individual tastes, the following personal appearance guidelines should be followed:

Inacceptable clothing

- a. Distressed jeans with rips, frays, and holes, T-shirt and shorts do not present appropriate professional attire.
- b. Any excessively revealing clothing
- c. Clothing, which is not appropriate to body size, i.e., extreme "baggy" or "tight"
- d. Clothing with offensive pictures or slogans
- e. Clothing or shoes with excessive tears, holes, stains, or dirt.
- f. Short pant;
- g. Miniskirt above (above knee)
- h. Slippers.

Jewellery

- Facial jewellery, such as eyebrow rings, nose rings, lip rings, and tongue studs, is not professionally appropriate and must not be worn during business hours.

Hair

- a. Hair must be clean, combed and neat.
- b. Fancy coloured hair and extreme hairstyles, such as spiked hair and shaved heads, do not present an appropriate professional appearance.
- c. Mustaches, beards, goatees and sideburns are acceptable only if they are clean and neatly trimmed.

Nails

- a. Fingernails should be neat, clean, and of moderate length.
- b. If nail polish is worn, it shall be in good repair.
- c. Nail art and nail colours that are extreme are not appropriate in the business environment.

Piercing and tattoos

- a. Multiple ear piercings (more than one ring in each ear) are not professionally appropriate and must not be worn during business hours.
- b. Visible excessive tattoos and similar body art must be covered during business hours.

Odor and hygiene

Offensive body odor and poor personal hygiene is not professionally acceptable i.e., strongly scented perfume, hairspray, cologne, or other personal products.

VIOLATIONS

If an employee's clothing is deemed inappropriate, he or she may receive verbal notices or a written warning. In the event of a serious violation of the policy, the employee may be required to change clothes.

The Company recognizes that employees, in their capacity as citizens, may wish to involve themselves in legitimate and lawful political activities. Participating in these activities must be conducted on the employee's own time and should in no way suggest Aypz support.

PROHIBITED ACTIVITIES

- The following activities are prohibited from being performed while on-duty:
 - a. Demonstrating;
 - b. Counting or recounting votes;
 - c. Circulating petitions
 - d. Soliciting votes or contributions at any time in any working area of Aypz's facility;
 - e. Conducting or participating in opinion polls;
 - f. Fundraising; and
 - g. All other activities considered part of employee's normal duties.
- Annual leave may be requested to conduct such activities subject to obtaining prior approval.
- Any employee who wishes to stand for State, Federal and/or material elections must resign from the Company.

BEING PART OF POLITICAL ORGANISATION OFFICER OR CANDIDATES

- In the event, the employee is appointed as an office holder at the Branch, Division, State or National level of a political party, the employee is to inform the Company of such appointment.
- In order not to compromise the interests of the Company, employees who wish to stand for State, Federal and/or material elections are required from the Company, subject to the requirements of applicable. Employee must not use their position with the Company to try to influence any other person (whether or not employed by the Company) to make political contributions or to support politicians or their parties in any country without approval from the Head of the Company.
- Charitable donations may not be used as a substitute for prohibited political payments.
- Employee is not allowed to make any contribution or incur any expenditure using the Company resources to benefit any political campaign, party or politician in any country without approval from the Management.
- The Company's facilities, equipment and resources may not be used for any political campaign or party functions such as making, copying or distributing political materials or messages copying or distributing political materials or messages.
- Political message that are inappropriate or offensive to co-workers are prohibited. Harassment of co-workers, customers or vendors regarding political preference will not be tolerated.



Alypz recognizes the importance of supporting employees in their participation in public service, recreational, sports, union, and community activities.

We believe that involvement in these activities not only contributes to the personal development and well-being of our employees but also strengthens our community and enhances team cohesion

COMPANY COMMITMENT AND SUPPORT

Encourage of Engagement

- We encourage employees to actively engage in activities that promote personal growth, health, and community involvement.
- We respect professional boundaries by ensuring that participation in activities does not interfere with job performance, workplace conduct, or organizational policies.

Flexibility and Accommodation:

- We are committed to providing reasonable flexibility in work schedules to accommodate employees' participation in public service, sports, and community events.
- Employees are encouraged to discuss their participation plans with their supervisors to arrange for time off or flexible work arrangements as needed.

Recognition of Contributions:

- We recognize and appreciate the contributions employees make through their involvement in community and public service activities.
- Employees who participate in or organize such activities will be acknowledged for their efforts and positive impact.

Work-Life Balance

- We support a healthy work-life balance and understand that involvement in extracurricular activities is an integral part of personal and professional well-being. Our policies aim to facilitate this balance while ensuring that job responsibilities are met.

Professional Development

- We recognize that participation in sports, union activities, and community events often contributes to skills development, leadership, and team-building.
- We support employees in pursuing opportunities that align with their personal and professional growth.

Community Impact

- By participating in these activities, employees contribute to the betterment of the community and enhance the organization's reputation as a socially responsible entity. We encourage and support initiatives that align with our values and mission.

YOUR COMMITMENT

- You are encouraged to communicate your participation plans to their supervisors in advance to ensure that work responsibilities are managed effectively.
- You must seek approval from your immediate superior before engaging in activities that may impact your work schedule or duties. This includes participation in events during work hours or those requiring time off.
- You may request time off for participation in public service, sports, or other activities, subject to approval based on operational needs and company policies.
- Employees participating in activities as representatives of the organization should adhere to organizational standards conduct and ensure that their participation reflects positively on the organization.
- You are expected to adhere to a professional code of conduct when participating in activities, maintaining the integrity and reputation of the organization.
- You shall maintain confidentiality and not disclose sensitive or proprietary information related to the organization while participating in external activities.
- You must comply with this policy and any related procedures. Non-compliance or actions that negatively impact work performance or the organization's reputation will be addressed according to disciplinary guidelines.



Alypz aims to foster good relations among all employees and management and we acknowledge that grievances can occur at any time, arising from disagreements between employees or decisions made by the Management.

YOUR COMMITMENT

- A grievance is a formal complaint made by an employee about issues directly affecting their work environment, treatment, or working conditions. It usually involves disputes or dissatisfaction related to job roles, workplace policies, or interactions with management or colleagues
- At Alypz, we wish to provide a comfortable, productive, legal and ethical work environment. To this end, the company wants you to bring any grievances you have about the workplace to the attention of your supervisor and, if necessary, to upper-level management.
- If you feel that there is inappropriate conduct or activity on the part of the company, management, its employees, vendors, customers, or any other persons or entities related to the company, we request that you bring this concern to the immediate attention of your immediate superior.
- You may approach your immediate superior at a time and place that will allow the superior to properly listen to your concerns.
- If you have discussed this matter with your superior previously and you do not believe that you have received a sufficient response, we request that you present your concerns to your superior in writing by indicating what the problem is, those persons involved in the problem, and any suggested solution you may have to the problem.
- If you do not receive a sufficient response to your written complaint within three (3) working days from providing it to your superior, or if your superior is the problem, you should contact the next level of supervision, and so on.
- If you consider the matter an emergency, legal, ethical or safety issue, use your best judgment to expedite the complaint process. The company may have a conference with you and your superior or with both of you individually.
- If the matter is not resolved after that conference, and you believe it still merits attention, it is requested that you immediately place your concerns in writing and bring the matter forward to upper-level management.
- It is the purpose of this grievance policy and procedure to help maintain a positive work environment with respect and responsibility towards each other. This policy also intended to avoid unnecessary employee claims and company legal exposure.
- We cannot promise that your specific grievance or complaint will result in the action you request or that you will be satisfied with the outcome of the grievance procedure.

REPORTING

Any report of misconduct that concerns Alypz must be made to Human Resources Lead, delivered and marked as **HIGHLY PRIVATE & CONFIDENTIAL**.

REFERRABLE MATERIAL

This Policy shall be read in conjunction with other **Grievance Guidelines**.



POLICY WHISTLEBLOWING

Alypz is committed to adhering to the highest standards of ethical behavior in terms of governance, integrity, accountability and transparency in the conduct of our business and operations. We aspire to conduct our business dealings and relations in an ethical, responsible and transparent manner.

OUR COMMITMENT

- Alypz is committed to maintaining the highest standards of ethics, integrity, and transparency in all our business operations. This Whistleblowing Policy provides a mechanism for employees and other stakeholders to report any wrongdoing or concerns, ensuring that those who raise concerns in good faith with the assurance that personnel or any parties making such reports shall be treated fairly, their identity remains confidential and are protected from retaliation
- We commit to protect and support whistleblowers who report any wrongdoing in good faith;
- We commit to maintain the trust for whistleblowers to speak up without fear of retaliation;
- We commit to ensure confidentiality and protect the rights of whistleblowers.
- Report of wrongdoing, misconduct, or violation of Alypz's policies and procedures shall be done through dedicated and confidential channels to the relevant designated person.

REPORTING

Reporting Lines

- An you has been directly harassed or has witnessed or is affected by the harassment of others, you should report such conduct to the following channels, delivered and marked as **HIGHLY PRIVATE AND CONFIDENTIAL**:
 - a. Department Lead
You are encouraged to raise concerns with your immediate supervisor or manager first, where appropriate.
 - b. Human Resource Lead
If you needs help in determining whether harassment has occurred, or whether to take the formal or informal approach, you should seek advice from the Human Resource Lead.
 - c. Whistleblowing Hotline:
If you are not comfortable approaching the Department Lead or Human Resources Lead, or the latter is the subject of the complaint, you should raise the matter to the ethics@alypz.com.

Anonymous Complaint

- While anonymous reports are accepted, whistleblowers are encouraged to provide as much detail as possible to facilitate a thorough investigation. Anonymous reports may limit the ability to gather additional information or will not be investigated.

Information Required

When raising a concern, you shall provide the following information:

- a. A clear description of the issue.
- b. Names of individuals involved (if any).
- c. Relevant dates, times, and locations.
- d. Any supporting documentation or evidence.
- e. The impact or potential risk to the company.

Investigation Process

Upon receiving a report,

- a. the company will acknowledge receipt of the concern within 3 working days;
- b. Assign the investigation to a designated team or individual, depending on the nature of the complaint;
- c. Conduct a fair and impartial investigation while maintaining confidentiality; and
- d. Inform the whistleblower (if not anonymous) of the outcome once the investigation is complete, within legal and confidentiality constraints.

PROTECTION OF WHISTLEBLOWERS

- Who raise concerns in good faith will be protected from retaliation, such as:
 - a. Dismissal or demotion.
 - b. Harassment or discrimination.
 - c. Any form of detrimental treatment.
- Anyone found retaliating against a whistleblower will face disciplinary action, up to and including termination.

FALSE ALLEGATIONS REPORT

- False allegations reports made maliciously or in bad faith will not be tolerated.
- Anyone making a false allegation with intent to harm others may face disciplinary action.

CONFIDENTIALITY

- All whistleblower reports and the identity of the whistleblower will be kept confidential to the fullest extent possible, consistent with the need to conduct a thorough investigation.

REFERRABLE MATERIAL

This Whistleblowing Policy shall be read in conjunction with other Alypz's business ethics policies.

Disciplinary Process and Sanctions

1. The maintenance of discipline, good conduct and decorum amongst the employees of Aypz is critical to the smooth running of its business or enterprise and is for the common good of Aypz and its employees.
2. The term misconduct means improper behaviour or an act or conduct in relation to duties or work which is inconsistent with the due performance of obligations to Aypz and includes a breach of discipline or violation of this Code or the rules and regulations as set out in any handbooks, policies or procedure statements or in any documentation of Aypz.
3. Subject to the requirements of applicable law and gravity of the offence committed and after due inquiry, disciplinary action may be taken against any person covered by this Code for misconduct or non-compliance with such laws, regulations, rules and procedures. The person affected may be subject to any of the following punishments:
 - a. Dismissal without notice
 - b. Downgrading
 - c. Suspension without pay up to maximum of two weeks
 - d. Stoppage/withholding of increment
 - e. Withholding of promotion
 - f. Reduction of salary
 - g. Written warning
4. Provision concerning disciplinary procedures and actions relevant to your jurisdiction are set out in **Disciplinary Action Policy and Procedure** and **Control of External Provider Procedure**. In case if no such provisions are set out in such a supplement for your jurisdiction, the standard disciplinary rules and practices for dealing with violations of company policy in your jurisdiction will apply. In every instance subject to the requirements of applicable law.