# CODE OF CONDUCT / DISCIPLINE

#### 28. CODE OF CONDUCT

(a) This Code of Conduct (the 'Code') contains policies and guidelines relating to the standards and ethics that all employees are expected to adhere to in the course of their work. It is designed to maintain a harmonious standard in the work place among employees of all levels. It also sets out the circumstances in which such employees would be deemed to have breached the Code and action that can be taken against them if they doso.

## (i) PROFESSIONALCONDUCT

All employees shall observe and adhere to the highest standard of professional conduct. They should, in all respects and at all times, conduct themselves with integrity, propriety and decorum and must not under any circumstances, commit any act or omission that would bring damage to the Company, its property, reputation or generalinterests.

Employees are expected to have respect and tolerance for cultures and religions other than those of their own whether locally or overseas and shall conduct themselves in accordance with accepted standards of behavior.

The Company does not tolerate any form of abusive or coercive behavior whether verbal or otherwise, physical violence or sexual harassment among itsemployees.

## (ii) ATTENDANCE / PUNCTUALITY

All employees are required to observe the stipulated working hours of the Company. If an employee is unable to commence work on time on any particular day, he must inform his immediate supervisor by telephone at the earliest available opportunity and in any event no later than four (4) hours after commencement of work on that day.

Late attendance by an employee will be recorded in the respective employee's attendance record maintained by the HRD. If any employee is late for work on more than three (3) occasions in a month an appropriate caution letter will be issued to the employee. If he persists in late attendance and without good reason, he shall be subject to disciplinary action. For the purpose of this section, 'good reason' shall be construed as a reason which is not, in the opinion of the HRD, frivolous, or inconsequential.

An employee who is unable to attend work because of illness shall submit his original medical certificate to the HRD on the day he returns to work. Anemployeemustnot, without goodreason, becontinuously absent from work formore than two (2) consecutive days without having obtained prior approval for leave from his relevant superior. If the employee is not able to obtain such prior approval, his must inform his superior or the HRD of the reason for such absence at the earliest opportunity during such absence.

## (iii) APPEARANCE

All employees must be suitably attired and groomed at all times at the work place. Their clothes and personal grooming should reflect what is appropriate to their jobs, the work environment and personalsafety.

Employees who are provided with company uniforms are expected to wear their uniform during working hours.

### (iv) CODE OF CONDUCT & ETHICS

## (a) Commitment

- (i) All employees shall, in the course of their employment with the Company and in carrying out their duties and responsibilities in respect thereof, diligently and to the best of their ability perform such duties and responsibilities as may from time to time be assigned or designated tothem.
- (ii) All employees are expected at all times to promote and advance the interests of the Company and shall not do anything to bring disrepute to the Company.
- (iii) All employees shall obey, comply with and observe rules, regulations, procedures, practices, orders, directives and policies of the Company, whether expressed or implied in law or by custom and practice.

## (b) Confidentiality

- (i) No employee is permitted whether during or after termination of his employment with the Company, to discuss or divulge confidential information relating or pertaining to the Company directly or indirectly to any person or company unless:-
  - (a) such information has previously been made public knowledge ;or

- (b) upon express approval of the Company;
- (ii) Employees should not discuss whether among themselves or with others, within the workplace or outside the Company's premises, confidential information regarding the Company, its business partners, its customers or clients, its employees or any another confidential information except in the course or carrying out the Company'sbusiness.

## (c) Insubordination and Inefficiency

An employee shall not commit any act of willful refusal, insubordination or disobedience of any lawful and reasonable instruction of his supervisor/manager. This includes refusal to perform work assigned, being inefficient and deliberately slowing down of work causing the quality and/or the quantity of work to be adversely affected.

#### (d) Press Releases and PublicStatements

An employee should inform his immediate supervisor if a member of the media approaches him for any information, statement or opinion concerning the Company.

An employee shall not make any public statement on the policies or decisions of the Company whether orally or in writing or in any form whatsoever nor shall he circulate or cause to be circulated any such statement.

#### (e) Publications

Employees are not permitted to publish or distribute in any written or printed form, articles, books, periodicals, leaflets, brochures etc containing information relating to the Company without prior written approval of the Company.

#### (f) Conflict OfInterest

An employee is not permitted to engage directly or indirectly in any other business or occupation whether as principal, agent, servant or broker while still in the employ of the Company. He is also not permitted to engage in any activity, which can be detrimental, directly or indirectly, to the interest of the Company. Employees are required to sign the form of declaration of interest during the first day reporting to work.

An employee is 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 benefit.

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## (g) Personal Solicitation

The Company discourages any solicitation by employees during working hours as such solicitations normally disrupt business activity and work routines.

Employees are not permitted to sell, distribute or act as agent for the sale or distribution of any type of food or merchandise in the office premises whether during or outside office hours.

#### (h) Graft and Invitation to Graft

An employee shall not in any manner or form offer on behalf of the Company or receive an offer of graft or a bribe for his own benefit, or for the benefit of his relatives or his family.

### (i) IntellectualProperty

If during the tenure of employment with the Company, an employee either alone or jointly with any other persons makes or devises any invention, process of improvement, software programs, technique, method of manufacture or formula, he shall disclose truly and fully to the Company and deliver to the Company all documents, working papers, specifications, software programs or formula pertaining to the above, which may be in his control, possession or custody.

### 29. SEXUALHARASSMENT

(a) It is the policy of the Company to promote a safe and healthy working environment that foster mutual respect where individual employees irrespective of status or position are treated with dignity and free from sexualharassment.

Employees are strictly prohibited from engaging in any from of harassment, humiliation and intimidation of a sexual nature.

## (b) Definition.

Sexual harassment is defined as any unwanted conduct of a sexual nature having the effect of verbal, non-verbal, visual, psychological or physicalharassment.

- (i) That may, on reasonable ground, be perceived by the recipient as placing a condition of a sexual nature on hisemployment.
- (ii) That may, on reasonable, be perceived as a threat to his well being, but has not direct link to hisemployment.
- (c) Sexual harassment can occur between individuals of different sexes or of the samesex.

Based on the above definition, sexual harassment may be divided into two categories, namely sexual coercion and sexual annoyance.

- (i) Sexual coercion is sexual harassment that results in some direct consequence to the victim's employment. An example of sexual harassment of this coercive kind is where a superior, who has power over salary and promotion, attempts to coerce a subordinate to grant sexual favours. If the subordinate accedes to the superior's sexual solicitation, job benefits will follow. Conversely, if the subordinate refuses, job benefits are denied.
- (ii) Sexual annoyance, the second type of sexual harassment is sexually related conduct that if offensive, hostile or intimidating to the recipient, but nonetheless has no direct link to any job benefits. However, the annoying conduct creates a bothersome working environment which the recipient has to tolerate in order to continue working. Sexual harassment by an employee against a co-employee falls into this category. Similarly, harassment by a Company's client against an employee falls into this category.
- (d) Sexual harassment in the workplace includes any employment-related sexual harassment occurring outside the workplace as a result of employment responsibilities or employment relationships. Situations under which such employment-related sexual harassment may take place include, but are not limited to thefollowing:
  - (i) at work-related socialfunctions;
  - (ii) in the course of work assignments outside theworkplace;
  - (iii) during work-related conferences or trainingsessions;

- (iv) during work-related travel
- (v) over the phone; and
- (vi) through electronic media

It is essential to emphasize that sexual harassment refers to sexual conduct, which is unwanted and unwelcome to the recipient. It is also a sexual conduct which is imposed on and unsolicited or unreciprocated by therecipient.

#### (e) Forms of SexualHarassment

Sexual harassment encompasses various conducts of a sexual nature which can manifest themselves in five possible forms, namely:

- (i) verbal harassment: e.g. Offensive or suggestive remarks, comments, jokes, kidding, teasing, sounds, inquiries or discussions about sexual activities or other verbalabuse;
- (ii) non-verbal / gesture harassment e.g. leering or ogling with suggestive overtones, licking lips, holding or eating food provocatively, hand signal or sign language denoting sexual activity, persistentflirting;
- (iii) visual harassment e.g. showing pornographic materials, writing sexually suggestive letters or other written material, sexual exposure;
- (iv) psychological harassment e.g. repeated unwanted social invitations, proposal for dates or physicalintimacy;
- (v) physical harassment e.g. inappropriate touching, patting, pinching, stroking, grabbing, hugging, kissing, fondling, brushing up against the body, coerced sexual intercourse or sexual assault.

# (f) DisciplinaryAction

Since sexual harassment is a form of misconduct, all employees including supervisors and manager will be subject to disciplinary action up to and including dismissal for engaging in sexual harassment. Employees who make false and malicious complaints of sexual harassment as opposed to complaints that are made in good faith will also be subject to disciplinary action.

An independent and thorough investigation in a manner that is as confidential as possible under the circumstance will be carried out on all complaints received alleging sexual harassment.

## (g) ComplaintProcedure

Due to the sensitive and personal nature of sexual harassment complaints, the Company will pay special attention to deal specifically with such complaints.

Employees who believe they have been aggrieved under this policy are strongly encouraged to raise written complaints of sexual harassment as promptly as possible to the HRD. Delay in making a complaint of sexual harassment may make it more difficult for the Company to conduct an investigation.

As a standard practice, all cases of sexual harassment will be reported to the Police for further action.

## 30. DISCIPLINE

(a) The Company must ensure that a reasonable standard of work and conduct is maintained in the management of its business. The Company is equally concerned to ensure fair treatment for employees when disciplinary action has to be taken in the event the employees failed to meet the necessary performance standards or have committed misconduct; and such cases will be dealt with in accordance with the rules of naturaljustice.

### (b) Misconduct

A "Misconduct' is defined as any act or omission which is inconsistent with the fulfilment of the expressed or implied conditions of the contract of service. The following are some examples of misconduct and is not exhaustive:-

#### **Major Misconduct**

- (1) Willful insubordination's or disobedience whether alone or in concert with others, to any lawful and reasonable order of asuperior.
- (2) Theft, fraud or dishonesty including attempted fraud or attempted dishonesty in connection with Company's business, monies and property.
- (3) Willful damage to or loss of Company goods orproperty.
- (4) Taking or giving bribes or any illegalgratification.

- (5) Gambling or card playing, whether for money orotherwise.
- (6) Riotous or disorderly behavior or fighting in the Companypremises.
- (7) Violence, abusing, assaulting or threatening to assault or to do any injury to other employee or superior within Companypremises.
- (8) Habitual absence; absence for more than two (2) consecutive days without reasonable excuse (AWOL) or without informing or attempting to inform the employer at the earliestopportunity.
- (9) Leaving work place during working hours withoutpermission.
- (10) Habitual lateattendance.
- (11) Engaging in strikes or inciting others to strike in contravention of provisions of any written laws or regulations of Malaysia.
- (12) Habitual or culpable negligence of hisduties.
- (13) Willful slowing down of work or inciting others to doso.
- (14) Disclosing commercial secrets or design of the Company/ Company info to third party
- (15) Collection of monies or distributing of pictures, literature, leaflets or posting notices within the Company premises without the prior approval in writing of the management.
- (16) Repeated failure to meet established work standard and slackness in performance.
- (17) Failure to obey safety rules or tempering with other safetydevices.
- (18) Inefficiency or lack of skill which an employee expressly or implicitly warrants himself to know or posses.
- (19) Habitual breach of any Company rules and regulations pertaining to conduct and discipline.
- (20) Participating in unauthorized financial transaction (e.g. intentionally classifying vehicle for different toll rates) within the Company premises or TollPlazas.
- (21) Bringing and consuming alcoholic liquor within the Company premises without prior permission of the Company.

- (22) Possessing illegal drugs or narcotics within the Companypremises.
- (23) Stealing other employees' property within the Companypremises.
- (24) Committing an immoral act within the Companypremises.
- (25) Failure to give reasonable or satisfactory explanation for the presence of Company's property or products found in the employee's vehicle or in the employeepossession.
- (26) Clocking another employee's attendance on his behalf or tempering with the time clock or altering the clock card to produce a fraudulentresult.
- (27) Failure to report an infections or contagious disease affecting himself to the Company or Company PanelDoctors.
- (28) Obtaining or attempting leave or absence by falsepretence.
- (29) Failure or refusal to submit to a search when required to do so by the Company's authorized personnel within the Company's premises.
- (30) Participating in any subversive activities which affect the general behavior of other employees in the Company.
- (31) Engaging in private work or trade within the Companypremises.
- (32) Offering or accepting 'kickbacks' or bribes to grant or receivefavors.
- (33) Drinking alcoholic liquor or being under the influence of liquor whilst onduty.
- (34) Conduct within the Company, which is likely to endanger the life or safety of any person.
- (35) Refusal to accept any communication served either in accordance with the code of conduct or in the interest of discipline.
- (36) Interfering with the record of attendance or recording attendance of any other employee or falsification, defacement or destruction of any record of the Company.
- (37) Possession of any illegal or dangerous weapon in the Companypremises.
- (38) Trespassing or forcible occupation of the Companypremises.
- (39) Picketing in the Company premises except where allowed under any writtenlaw.

- (40) Willful failure to report at once to his Superior or Manager any defect which an employee may notice in any equipment connected withwork.
- (41) Willful failure to report any defect or occurrence which an employee may notice or which might endanger himself or any other employee or public users or which might result in damage to the Company's or any person's property within Companypremises.
- (42) Threaten, intimidate or instigate other employee to take any form of illegal industrialaction.
- (43) Taking part in anti-government activities prejudicial to the maintenance of law or order.
- (44) Deliberate damage and interference with or contamination of materials or equipment.
- (45) Forging or defacing medical certificates or other official documents to defraud the Company.
- (46) Sleeping while onduty.

#### **Minor Misconduct**

- (1) Absent without permission and without valid reason or excuse.
- (2) Coming late towork.
- (3) Any action contrary to office procedures.
- (4) Leaving work, workplace, etc. or leaving before the proper ending time without priorpermission.
- (5) Committing nuisance in the office or at companypremises.
- (6) Eating within working area and / or during workinghours.
- (7) Entering another department or unit in the Company otherwise in the course of duty.
- (8) Tempering or damaging or disposing the Company's uniforms.

- (9) Not taking proper care of the tools, vehicle etc. entrusted tohim
- (10) Not keeping his workplace cleans andtidy.
- (11) Posting, altering or removing any matter or bulletin boards or Company property without the permission of the Management.
- (12) Bringing friends/visitors into company premise without permission, unless on official tour of the restricted areas. Entertaining private visitors without permission.
- (13) Failure to observe the safety and health rules and regulations.
- (14) Interfering with another person's work during working hours. Not informing Department Head when leavingworkplace.
- (15) Not wearing uniform provided by the Company while atwork.
- (16) Improper use of toilets or other facilities.
- (17) Unauthorized use of Company vehicles, equipment or fire or safety devices and appliances.

## (c) Procedure on DisciplinaryAction

All disciplinary actions taken by the Company shall comply with the Company's established procedures and current legislation. Where there is any conflict between the two, the current legislation shall prevail.

- (i) For minor misconduct, the Head of Department shall, after counseling the employee concerned, issue a caution letter to the employee with a copy given to HRD for recordpurpose.
- (ii) For misconduct which warrants a warning, the Head of Department shall notify the HRD by providing all relevant details pertaining to the case to enable the HRD to take appropriate action.
- (iii) For repeated misconducts, a second or final warning letter, as the case may be, will be issued to the employee after investigation has been conducted. If the employee commits further misconducts after receipt of the final warning, stern disciplinary action including dismissal may be taken against him after dueinquiry.

The above disciplinary actions are only applicable to normal misconducts and offences. In the case where the misconduct or offence is of a fundamental nature, instant dismissal will be effected, after due inquiry. Depending on the gravity of the alleged offence(s) the Company may temporarily suspend the employee

concerned from work during the process of investigation or pending the outcome of the domestic inquiry. For cases which involve criminal breach of trust or which result in financial loss to the Company, criminal and civil actions will be instituted against the employee(s)concerned.

## (d) Inquiry

A panel appointed by the Company shall conduct all domestic inquiries. The inquiry panel shall not include a member(s) whose presence may affect the impartiality of the panel in its conduct of the proceedings and its recommendations.

The proceedings of an inquiry shall be duly recorded by the panel for submission to the HRD or to the appropriate higher authority for decision.

# e) DisciplinaryActions

- (i) Depending on the gravity of the offence committed and after due inquiry, the employee who is found guilty may subject to any one of the following punishments:
- (ii) Dismissal withoutnotice
- (iii) Downgrading
- (iv) Suspension without pay up to a maximum of two (2)weeks.
- (v) Stoppage/withholding ofincrement
- (vi) Withholding ofbonus
- (vii) Withholding of promotion
- (viii) Reduction ofsalary
- (ix) WrittenWarning
- (x) Any other form of disciplinary action as deemedappropriate.

# (f) Right of Appeal

An employee who has been imposed a disciplinary action shall have the right to appeal in writing within three (3) working days of the announcement of the decision, to the Managing Director

The decision of the Management is final and shall be submitted to the employee inwriting.

## (g) GrievanceProcedure

- (a) A grievance is defined as any discontent or dissatisfaction, whether expressed or not, arising out of anything connected with the Company that an employee thinks, believes or perceives as unfair, unjust or inequitable.
- (b) It is the desire of the Company that any grievances arising between an employee and another or between an employee and his superior, be settled as amicably, equitably and quickly aspossible.
- (c) Employees should, whenever possible try to resolve disputes and minor problems amicably and informally among themselves or together with their immediatesupervisors.
- (d) If such informal means do not bring a resolution, an employee may bring to the HRD attention any grievance or complaint within fourteen (7) days form the date of occurrence of the event. The filing of a formal grievance in writing should be done only if such complaints cannot be resolved through these informal discussions. A member of the HRD shall be assigned by the Management to attend to such grievances or complaints.
- (e) The HRD may at its discretion and depending on the seriousness of the grievances and complaints, bring the matter to the attention of the Managing Director r forconsideration.

A decision will be made within the next 5 working days which is deemed as final and binding

### h) WHISTLE BLOWING POLICY

#### **PolicyStatement**

Titijaya is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible and transparentmanner. Recognizing the abovementioned values, Titijaya provides avenue for all employees of Titijaya and members of the public to disclose any improper conduct within Titijaya

# **Objective of the Policy**

This policy is to provide an avenue for all employees of Titijaya and members of the public to disclose any improper conduct in accordance with the procedures as provided for under this policy and to provide protection for employees and members of the public who report such allegations.

This policy is designed to facilitate employees and members of the public to disclose any improper conduct (misconduct or criminal offence) through internal channel. Such misconduct or criminal offences include thefollowing:

- i. Fraud;
- ii. Bribery;
- iii. Abuse of Power;
- iv. Conflict ofInterest:
- v. Theft orembezzlement;
- vi. Misuse of Company's Property;
- vii. Non Compliance with Procedure

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under Titijaya 'Code of Conduct and Business Ethics (CCBE) or any criminal offence under relevant legislations in force.

This policy is not to invalidate the Grievance Procedure and / or the Disciplinary Action Process and Procedures(DAPP) but to provide more avenues for employees and members of the public to disclose improper conduct committed or about to be committed to the Company. The given procedures as reflected in the Collective Agreements , Employee Handbook and CCBE shall be operative based on the purpose and objective of their existence.

Applicability of the Policy Subject to the requirement of applicable local jurisdiction, this policy applies to all employees of Titijaya and its subsidiaries. This policy also applies to members of the public, where relevant.

#### **Procedure in Making a Disclosure**

All disclosures are to be channeled in accordance with the procedures as provided under this policy.

## **Protection to Whistle blower**

A whistle blower will be accorded with protection of confidentiality of identity to the extent reasonably practicable. In addition, an employee who

whistle blows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within Titijaya to the extent reasonably practicable provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistle blower is mistaken as to the facts and the rules and procedures involved.

# **Anonymous Whistle blower**

Any anonymous disclosure will not be entertained . Any employee or member of the public who wishes to report improper conduct is required to disclose his identity to the Titijaya in order for the Company to accord the necessary protection to him. However, the Company reserves its right to investigate into any anonymous disclosure.

#### **Notification**

Upon the completion of the whistle blowing process and procedures, the whistle blower will be accorded the privilege to be notified on the outcome of the disclosure.

Titijaya reserves the right to amend this policy from time to time.

### I) COMPUTER AND INFORMATION SECURITY

This section sets forth some important rules relating to the use of Titijaya 's computer and communications systems. These systems include individual PCs provided to employees, centralized computer equipment, all associated software, and Titijaya 's telephone, voice mail and electronic mail systems. Titijaya has provided these systems to support its mission. Although limited personal use of Titijaya 's systems is allowed, subject to the restrictions outlined below, no use of these systems should ever conflict with the primary purpose for which they have been provided, Titijaya 's ethical responsibilities or with applicable laws and regulations. Each user is personally responsible to ensure that these guidelines are followed.

All data in Titijaya's computer and communication systems (including documents, other electronic files, e-mail and recorded voice mail messages) are the property of Titijaya. Titijaya may inspect and monitor such data at any time. No individual should have any expectation of privacy for messages or other data recorded in Titijaya's systems. This includes documents or messages marked "private," which may be inaccessible to most users but remain available to Titijaya. Likewise, the deletion of a document or message may not prevent access to the item or completely eliminate the item from the system. Titijaya's systems must not be used to create or transmit material that is derogatory, defamatory, obscene or offensive, such as slurs, epithets or anything that might be construed as harassment or disparagement based on race, color, national

origin, sex, sexual orientation, age, physical or mental disability, medical condition, marital status, or religious or political beliefs. Similarly, Titijaya's systems must not be used to solicit or proselytize others for commercial purposes, causes, outside organizations, chain messages or other non-job-related purposes.

Security procedures in the form of unique user sign-on identification and passwords have been provided to control access to Titijaya 's host computer system, networks and voice mail system. In addition, security facilities have been provided to restrict access to certain documents and files for the purpose of safeguarding information. The following activities, which present security risks, should be avoided.

- Attempts should not be made to bypass, or render ineffective, security facilities provided by the company.
- Passwords should not be shared between users. If written down, password should be kept in locked drawers or other places not easily accessible Document libraries of other users should not be browsed unless there is a legitimate business reason to doso.
- Individual users should never make changes or modifications to the hardware configuration of computer equipment. Requests for such changes should be directed to computer support or the ExecutiveDirector.
- Additions to or modifications of the standard software configuration provided on Titijaya's PCs should never be attempted by individual users
- . Requests for such changes should be directed to computer support or the ExecutiveDirector.
- Individual users should never load personal software (including outside email services) to company computers. This practice risks the introduction of a computer virus into the system. Requests for loading such software should be directed to computer support or the ExecutiveDirector.
- Programs should never be downloaded from bulletin board systems or copied from other computers outside the company onto company computers. Downloading or copying such programs also risks the introduction of a computer virus. If there is a need for such programs, a request for assistance should be directed to computer support or management. Downloading or copying documents from outside the company may be performed not to present a security risk.
- Titijaya's computer facilities should not be used to attempt unauthorized access to or use of other organizations' computer systems anddata.
- Computer games should not be loaded on Titijaya's PCs.
- Unlicensed software should not be loaded or executed on Titijaya's PCs.
- Company software (whether developed internally or licensed) should not be copied onto thumb drive or other media other than for the purpose of backing up your hard drive. Software documentation for programs developed
- Individual users should not change the location or installation of computer equipment in offices and work areas. Requests for such changes should be directed to computer support ormanagement.

There are a number of practices that individual users should adopt that will foster a higher level of security. Among them are thefollowing:

- Turn off your personal computer when you are leaving your work area or office for an extended period oftime.
- Exercise judgment in assigning an appropriate level of security to documents stored on the company's networks, based on a realistic appraisal of the need for confidentiality orprivacy.
- Back up any information stored locally on your personal computer (other than network based software and documents) on a frequent and regular basis. Should you have any questions about any of the above policy guidelines, please contact the ExecutiveDirector.

## INTERNET ACCEPTABLE USE POLICY

At this time, desktop access to the Internet is provided to employees when there is a necessity and the access has been specifically approved. Titijaya has provided access to the Internet for authorized users to support its mission. No use of the Internet should conflict with the primary purpose of Titijaya, its ethical responsibilities or with applicable laws and regulations. Each user is personally responsible to ensure that these guidelines are followed. Serious repercussions, including termination, may

result if the guidelines are not followed. Titijaya may monitor usage of the Internet by employees, including reviewing a list of sites accessed by an individual. No individual should have any expectation of privacy in terms of his or her usage of the Internet. In addition, Titijaya may restrict access to certain sites that it deems are not necessary for business purposes.

Titijaya's connection to the Internet may not be used for any of the following activities:

- The Internet must not be used to access, create, transmit, print or download material that is derogatory, defamatory, obscene, or offensive, such as slurs, epithets(name, label), or anything that may be construed as harassment or disparagement based on race, color, national origin, sex, sexual orientation, age, disability, medical condition, marital status, or religious or politicalbeliefs.
- The Internet must not be used to access, send, receive or solicit sexually-oriented messages orimages.
- Downloading or disseminating of copyrighted material that is available on the Internet is an infringement of copyright law. Permission to copy the material must be obtained from the publisher. For assistance with copyrighted material, contact computer support or the ExecutiveDirector.
- Without prior approval of the Executive Director, software should not be downloaded from the Internet as the download could introduce a computer virus onto epithets's computer equipment. In addition, copyright laws may cover the software so the downloading could be an infringement of copyrightlaw.
- Employees should safeguard against using the Internet to transmit personal comments or statements through e-mail or to post information to news groups that may be mistaken as the position ofepithets.

- Employees should guard against the disclosure of confidential information through the use of Internet e-mail or newsgroups.
- Employees should not download personal e-mail or Instant Messaging software to epithetscomputers.
- The Internet should not be used to send or participate in chain letters, pyramid schemes or other illegalschemes.
- The Internet should not be used to solicit or proselytize others for commercial purposes, causes, outside organizations, chain messages or other non-job related purposes.
- The Internet should not be used to endorse political candidates or campaigns. The Internet provides access to many sites that charge a subscription or usage fee to access and use the information on the site. Requests for approval must be submitted to yoursupervisor.

#### **CODE OF CONDUCT & ETHICS**

- > Commitment
- > Punctuality
- Confidentiality
- > Integrity
- Insubordination and Inefficiency
- > Press Releases and Public Statements
- ➤ Conflict Of Interest
- > Graft and Invitation to Graft
- > Intellectual Property