

# **BRANDPLUS PRECISION PLASTIC SDN BHD**

(537160-P)

## **BPP HANDBOOK**

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*This document remains the property of the Company and must be returned on demand or prior to the holder leaving the Company's service*

## **I. Company Code of Conduct**

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This code of conduct (“Code”) applies to all employees of **Brandplus Precision Plastic Sdn Bhd** (“the Company”) including full time or permanent employees or employees on secondment, fixed-term contract term.

The Company is committed to conduct its business fairly, impartially and in full compliance with all applicable laws and regulations in Malaysia and in countries where the Company has operations. The Company’s professionalism, honesty and integrity must at all time be upheld in the Company’s business dealings with customers, vendors, suppliers, contractors, government, regulators, investors, the business community as a whole and in the relationship of its own employees. Employees are not permitted to be involved or engaged in practices that affect or impair the Company’s integrity, impartially or reputation and are required to promote the interests of the Company, perform their duties with skill, honesty, care and diligence, using authority in a fair the equitable manner, abide by the Company’s policies and procedures, instructions and lawful directions that relate to their employment and duties.

It is the responsibility of every employee to act in accordance with the policies detailed in the Code and any updates or amendments which may be issued from time to time by the Company. It is also the employee’s responsibility to seek clarification, to ask questions and to report suspected violations or express concerns regarding compliance with the Code. Managers have added responsibility of supporting the implementation of the Code and monitoring compliance of the Code.

The objective of the Code is to ensure that the Company’s business interactions should not in any circumstances, tainted by malpractices.

### **A. Purpose of the Code:**

The Code shall serve as documentation of our commitment in business dealings in a manner that is efficient, effective and fair. This Code is meant as a reference for all levels of employees of the Company.

It is a guide to assist the Company’s employees to live up to the Company’s high ethical business standards and it provides guidance on employees conduct when dealing with other parties that have business dealings with the Company. It also provides guidelines for the manner employees should conduct themselves at the work place, while performing their daily duties for the Company.

The Code is a guide that highlights key issues and identifies the relevant policies and procedures to help employees conduct business in line with high ethical and integrity standards and it is not a comprehensive manual that covers every ethical situation employees may encounter during the course of their work.

### **B. Responsibility and Accountability:**

#### ***Employees:***

All employees are to comply with this Code and unawareness of the existence of this Code will not be accepted as an excuse for its breach. The Company will require all employees to sign a declaration to abide by this Code and it will be continuously updated to meet the Company’s business requirements.

Managers have the added responsibility to set a good example and to lead the employees under their supervision in the application of the Code in their daily business conduct. They are also responsible for promoting open and honest two-way communication to facilitate discussions that may occur from situation where the application of the Code may not be so clear. Manager should diligently be on the lookout for indications that unethical or illegal business conduct has occurred.

For the purposes of this Code, “Managers” include people managers, line managers and persons having management responsibility.

### **C. Open Door Practice:**

If employees come across any unlawful or unethical situation or any suspected violations of this Code, they shall raise their concerns in accordance with the Whistle-Blowing Policy.

## 1. EMPLOYEE CONDUCT

### 1.1 Workplace Environment

- a. Employees shall strive to maintain a healthy, safe and productive work environment which is free from discrimination or harassment based on race, religion, political opinion, membership in political group, gender, sexual orientation, marital status, national origin, disability, age or other factors that are unrelated to the Company's legitimate business interests.
- b. Employees shall avoid any conduct in the workplace that creates, encourages or permits an offensive, intimidating or inappropriate work environment including, but not limited to:
  - Threats or comments that contain discriminatory or harassment elements;
  - Unwelcome sexual advances;
  - Violent behaviour or actions;
  - Misuse or abuse of position of authority;
  - Inappropriate dressing in violation of the dress code or policy of the Company;
  - Possession of weapons of any type; or
  - Use, possession, distribution or sale of illegal drugs, alcohol or any prohibited substance, except for approved medical purposes. The consumption of alcoholic beverages on company premises is only permitted for company-sponsored events and with prior management approval.

### 1.2 Working Attitude

- a. Employees are expected to be adaptive and optimistic with continued energy and confidence to meet global challenges.
- b. Employees are encouraged to collaborate across markets, functions and teams towards achieving one BPP's common goal.
- c. Employees shall support the establishment of centres of excellence and innovation to enable knowledge sharing and the free-flow of ideas across BPP.
- d. Employees are expected to behave in a professional and harmonious manner, by treating each other with respect, dignity, fairness and courtesy.

### 1.3 Use of Resources and Protection of BPP's Assets

- a. Employees are provided with a variety of resources and access to assets of the company, regardless of the condition of value, assets belonging to the Company shall not be misused, taken, sold, lent, given away or otherwise disposed of, or used for personal purposes to the extent that it would affect the interest of the Company.
- b. Employees shall be personally responsible for protecting the Company's assets entrusted to them. Employees shall take all necessary steps to prevent theft, loss, damage to or misuse of assets belonging to the Company, the occurrence of which shall be reported immediately to the immediate superior.
- c. The types of assets shall be protected and the responsibilities of employees are:
  - Physical Assets such as equipment, systems, facilities, supplies, etc shall be used only for conducting the Company's business or for purposes authorized by management. They shall not be used for employees' personal activities.
  - Information and Communication Systems including connections to the internet shall be used for conducting the Company's business or for other incidental purposes authorized by the management of the Company. It is inappropriate to use them in a manner that interferes with employees' productivity.
  - Proprietary Information where all information (whether in written or oral form and whether on paper or electronic form) relating to technical, product and services, financial data and projections, marketing strategies and business plans, organizational and personnel information, decisions by the Company's board of directors,

trade secrets, pricing guidelines, methodology or prices of products and services, profit sharing arrangements, customer information, databases, records and any non-published financial or other data that is not public information or if known will have an adverse effect on the Company. Such information is the result of the innovation, ideas and hard work of employees and of substantial investments in planning, research and development. It is critical that employees treat such information as confidential in accordance with the requirements of Legal policy and take all necessary safeguards to protect this information. The Company's ownership of such proprietary information shall continue even after the employee leaves the Company.

- Intellectual Property Rights where all ideas, inventions or copyright produced by employees as a result of the work performed for or on behalf of the Company in the course of employment, whether that product is protectable or otherwise. Employees shall understand their responsibility to protect the Company's intellectual property and seek advice from the Group Legal Counsel when in doubt of their obligation in this regard. The Company's ownership of such intellectual property shall continue even after the employee leaves the Company.
- d. Employees are not allowed to use the Company's assets including equipment, resources and proprietary information for any outside work. Additionally, employees are not permitted to perform non-Company related work or solicit such business on the Company's premises or while working on the Company's time.
- e. Employees shall return all the Company's assets entrusted to them upon cessation of their employment including documents which contain the Company's proprietary information. Additionally, they may not disclose or use the Company's proprietary or confidential information.

#### 1.4 Data Integrity and Data Retention

- a. Employees shall record and report all information accurately and with integrity.
- b. Records shall be managed securely in line with their importance and in compliance with legal, tax, regulatory, accounting and other business retention requirements as required by the laws in the Country and also in accordance with the requirements of the Legal policy.

## **2. BUSINESS CONDUCT**

### 2.1 Dealing with External Parties

#### *a. Vendors and Business Partners*

- The Company shall take a collaborative approach in all their partnerships ensuring that employees address the specific needs of the stakeholders, while offering products, services and solutions.
- The Company shall conduct business with vendors or business partners that share the same ethical commitment as the Company, and shall avoid conducting business with vendors or business partners who are likely to harm the Company's reputation.
- Facts shall be weighed objectively and impartially to decide on vendors or business partners.
- Employees shall not exert or attempt to exert influence to obtain privilege treatment for any particular vendor. Vendors in competition for contracts with the Company shall at all times be able to have confidence in the integrity of the Company's selection processes.

#### *b. Governments*

- Employees shall hold themselves up to the highest standards of conduct and aim to proactively engage with the government to improve the social and economic conditions.
- Employees shall be aware of and adhere to the relevant laws and regulations pertaining to relations between government employees and customers, suppliers and business partners.
- Employees shall not provide gifts to government employees or those acting on the government's behalf if doing so violates certain local laws and regulations or could be reasonably construed as an action to seek special favour.

*c. Investors, Media, Analysts and Others*

- Any employee approached by investors, prospective investors, media and analysts on confidential information shall refer such requests to Group Corporate Communication.
- Employees shall also refer any request for information on the Company's business from investigators or law enforcement officials to the Group Legal Counsel.
- Employees shall not initiate contact with the media and analysis unless it is part of their job responsibilities, and with prior management approval and knowledge. In all instances, employees shall exercise caution in their communication.

*d. Competitors*

- Employees shall compete fairly and ethically within the framework of applicable competition laws.
- Employees shall exercise caution in all business contracts and contacts with competitors, suppliers and vendors and seek advice from Group Legal Counsel if in doubt whether an action violates any competition laws.
- Employees shall disassociate themselves and the Company from participation in any possible illegal activity with competitors and avoid communicating sensitive or confidential information which includes pricing policy, contract terms, marketing and product plans and any other proprietary information.
- Employees shall not use improper or illegal means to acquire a competitor's trade secrets or other confidential information. When working with such information, employees shall use it in the proper context and for legitimate purposes such as to evaluate the merits of the products, services and marketing of the Company. Such information shall only be made available to other employees on a need to know basis.

2.2 Authority to Make Commitments

- a. Employees are expected to be aware of and adhere to the Company's defined delegation of authority guidelines and processes for key functions and commitments, limits of authority documents and supplementary procedural documents.
- b. Commitments that bind the Company shall only be made by employees who are authorized to do so and in accordance with established limits of authority guidelines. It is not acceptable for employees to make any business commitments whether oral or written that contradict established guidelines and which create a new agreement or modify an existing agreement without proper approval consistent with the limits of authority guidelines.

2.3 Money Laundering

- a. Money laundering is the process of concealing the identity of proceeds from unlawful activities to convert "dirty" money to a legitimate source of income or asset. Money laundering is an offence under the Anti-Money Laundering and Anti-Terrorism Financing Act 2001 in Malaysia.
- b. Employees shall be aware of the applicable anti-money laundering laws and shall seek to ensure they are appropriately and adequately informed of developments in the laws relating to this area.
- c. Employees are expected to be mindful of the risk of the Company's business being used for money laundering activities and to raise any suspicious transactions to their immediate superior.

2.4 Bribes and Corruption

- a. Employees shall not offer, give, solicit or accept bribes in order to achieve business or personal advantages for themselves or others or engage in any transaction that can be construed as having contravened the anti-corruption laws.
- b. Employees shall be cognizant of the fact that bribes may be in any form, monetary or otherwise including but are not limited to unauthorized remuneration such as referral fee, commission or other similar compensation, material goods, services, gifts, business amenities, premiums or discounts of an inappropriate value or of an unreasonable level or that are not generally offered to others or that are prohibited by law or may reasonably be viewed as having crossed the boundaries of ethical and lawful business practice.
- c. Prior to giving or accepting any business amenity or other gifts (in whatever form or value), employees shall assess the appropriateness of their actions by assessing if the action could influence or could reasonably give the appearance of influencing the business relationship of the Company with that organization or individual or any business decision arising out of that business relationship.

2.5 Gifts, Entertainment and Others

- a. As a general rule, employees are discouraged from giving or accepting gifts, entertainment and other benefits to or from business partners. Notwithstanding this, the Company recognizes that the occasional acceptance or offer of modest gifts and entertainment may be a legitimate contribution to good business relationships.
- b. Generally, all invitations to business luncheons or dinners may be given or accepted by the employees. Employees receiving or giving the gifts, entertainment and other benefits is responsible for assessing whether it is appropriate and within the boundaries set out in this Code. The following rules and guidelines shall be observed:
  - The purpose of the gifts, entertainment and other benefits shall never influence business decision-making processes or cause others to perceive an influence.
  - The situation in which the gifts, entertainment and other benefits is received or given shall not be in connection with contractual negotiations of similar situations.
  - Such gifts declared shall be deemed to be the Company's assets and shall be treated in accordance to the guidelines set out in section "use of the Company's assets".

**3. CONFLICT OF INTEREST**

3.1 Competing against BPP

- a. Employees shall not engage in activities that have conflict with the business interests, even in their own time, including commercially marketing products or services in competition with the current or potential offerings of the Company.
- b. Employees are not allowed to provide any form of assistance to organizations that market products or services in competition with the Company regardless if they receive any direct or indirect remuneration of any kind for the assistance provided. Accordingly, employees shall not work for the competing organization in any capacity as an employee, consultant or as a member of its board of directors.

3.2 Supplying to BPP

- a. Employees shall not supply to the Company, represent a supplier, work for a supplier or be a member of the supplier's board of directors during your employment with the Company.

3.3 Personal Financial Interest and Borrowings

- a. Employees shall not have a financial interest in any organization that the Company conduct business with or compete with if that interest results in or appears to present a conflict of interest situation for the employees with the Company. Employees shall disclose such if it will cause or result in a conflict of interest situation.
- b. Employees shall consider the following factors when assessing if an inappropriate interest exists:
  - If the organization employees invest is competing with the Company.
  - The size of employee's investment relative to their salary or household income, and if the investment is significant enough to motivate employees to take actions to protect or enhance their investment.
  - The nature of employee's job in the Company would allow them to act in a manner that affects the value of their investment in other organization.
- c. Employees are prohibited from borrowing from any organization that the Company conduct business with or compete with, unless the organization is a legal financial institution and the loans are granted at rates that are available to the general public. Additionally, employees are also prohibited from borrowing from representatives of any organization that the Company conduct business with or compete with, regardless of the nature of business of the organization concerned.

3.4 Political and Charitable Contributions

Employees shall not use the company's funds and resources to make contributions to any political campaign, political party, political candidate or any of employee's affiliated organizations unless otherwise authorised by the Company's board of directors.

## II. Recruitment

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### 1. Purpose

The purpose of this **Recruitment Policy** is to ensure that **BRANDPLUS PRECISION PLASTIC** recruit employees in a fair, ethical, and transparent manner in compliance with the **Responsible Business Alliance (RBA) standards**. This policy aims to prevent discrimination, ensure equality in recruitment processes, and uphold human rights in the workplace.

### 2. Scope

This policy applies to all recruitment processes within **BRANDPLUS PRECISION PLASTIC**, covering the hiring of permanent employees, contractors, temporary staff, and interns. The policy also applies to recruitment across all departments, job levels, and locations in which **BRANDPLUS PRECISION PLASTIC** operates.

### 3. Compliance standards

**BRANDPLUS PRECISION PLASTIC** is committed to the **Code of Conduct**, which sets forth expectations for ethical recruitment practices. In line with the RBA, our recruitment process adheres to the following principles:

- **No Forced, Coercive, or Child Labour:** We ensure that our recruitment processes do not use forced, bonded, or involuntary labour. We also comply with legal age requirements for hiring and strictly prohibit child labour.
- **Non-Discrimination:** We ensure that recruitment is free from discrimination based on race, ethnicity, gender, sexual orientation, age, disability, religion, or any other characteristic protected by local, national, or international laws.
- **Fair Compensation:** We ensure that compensation offered aligns with legal wage standards and is sufficient to meet employees' basic needs. Compensation also complies with local labour laws and any collective agreements.
- **Freedom of Association:** We respect the right of employees to join, form, or not to join unions, and to engage in collective bargaining.
- **Safe and Healthy Working Conditions:** We commit to ensuring that all recruitment is aligned with providing a safe, healthy, and respectful working environment.

### 4. Recruitment Principles

**BRANDPLUS PRECISION PLASTIC** follows a set of guiding principles to ensure a fair and transparent recruitment process:

- **Transparency:** All job advertisements, job descriptions, and hiring decisions will be made transparently and will clearly reflect the company's requirements, job expectations, and responsibilities.
- **Equal Opportunity:** We are an equal opportunity employer and will recruit individuals without discrimination, ensuring the process is fair and accessible to all, regardless of personal characteristics.
- **Clear Communication:** Candidates will be provided with clear information about job roles, compensation, benefits, and working conditions.
- **Respect for Local Laws:** Our recruitment practices are in full compliance with applicable local, national, and international labour laws and standards, including those related to age, work hours, and health and safety.

### 5. Recruitment Process

The recruitment process is designed to be inclusive, fair, and aligned with standards. It typically involves the following steps:

- **Job Advertising:** All open positions will be advertised through appropriate channels, ensuring the advertisement is clear, transparent, and accessible to all potential candidates.
- **Application Process:** Applicants will submit their resumes, and we may require additional documentation depending on the role. All candidates are expected to provide accurate and truthful information.

- **Selection and Interview:** Our recruitment team will evaluate candidates based on skills, qualifications, and experience relevant to the job position. Interviews will be conducted in a professional, respectful, and unbiased manner.
- **Background Checks:** In accordance with RBA standards, we will conduct legal and fair background checks, including verification of education, employment history, and criminal records (if applicable), as per local regulations. All background checks will be conducted with the consent of the candidate.
- **Offer and Acceptance:** Once a suitable candidate has been selected, a formal offer will be extended. The candidate will be provided with a written employment contract outlining the terms and conditions of employment, including salary, benefits, work hours, and expectations.

## 6. Prohibited Recruitment Practices

In alignment with standards, **BRANDPLUS PRECISION PLASTIC** strictly prohibits the following recruitment practices:

- **Forced Labour:** **BRANDPLUS PRECISION PLASTIC** will not engage in any recruitment practices that involve forced, bonded, or involuntary labour. All employment must be voluntary.
  - **Bonded labour:** Forced labour resulting from debts owed to an employer or another party.
  - **Human trafficking:** The illegal trade or recruitment of people for forced labour.
  - **Involuntary servitude:** Work performed under threat or coercion, where the worker is not free to leave.
  - **Withholding of documents:** Confiscation of identification documents, work permits, or passports to limit a worker's freedom of movement.
  - **Coercion through debt bondage:** Circumstances where workers are subjected to excessive debt or exploitative conditions that prevent them from leaving their employment.
- **Child Labour:** We strictly adhere to the local minimum age laws regarding employment, ensuring no individuals below age of 18 are hired.
  - **No children under 18** may be employed or engaged in any work or service that is part of the company's operations.
  - **Children aged 17-16** may only be engaged in **light work** in non-hazardous environments. In accordance with the **Employment (Minimum Wages) Act** and local regulations for aged 13-14 may engaged in light work in non-hazardous environment.
  - **No work is permitted during school hours** for children aged 15 and below.
- **Recruitment Fees:** We prohibit any form of recruitment fee or charge being imposed on candidates, whether directly or indirectly. All recruitment costs will be borne by **BRANDPLUS PRECISION PLASTIC**, and candidates should not be required to pay for job placement or recruitment services.
- **Discrimination:** Discriminatory practices based on race, gender, nationality, religion, disability, or other characteristics unrelated to the candidate's qualifications and job performance are prohibited. We promote diversity and strive to build an inclusive workforce, including **fair representation of women, persons with disabilities, and migrant workers.**
  - Employees who experience or witness discrimination or harassment are encouraged to report it through the following channels:
    - Speak directly with your supervisor or manager
    - Contact the **Human Resources Department**
    - Submit a report through the anonymous grievance box or hotline: 07-8616286 ext : 260/267 or email : [Admin1@bpp.com.my](mailto:Admin1@bpp.com.my) / [may.teo@bpp.com.my](mailto:may.teo@bpp.com.my)

All complaints will be handled **confidentially**, investigated promptly, and without retaliation.

## 7. Employee Rights and Freedom of Association

**BRANDPLUS PRECISION PLASTIC** ensures that recruitment processes respect and uphold employees' rights to freely associate and engage in collective bargaining specifically:

- **Right to Join Unions:** Employees have the right to join or form a union of their choosing without interference or fear of retaliation.

- **Right to Participate in Collective Bargaining:** Employees may participate in collective bargaining activities to negotiate terms and conditions of employment.

## 8. Compliance with International Standards

**BRANDPLUS PRECISION PLASTIC** aligns its recruitment practices with international labour standards, including the **International Labour Organization (ILO) conventions**, ensuring:

- Fair wages that meet or exceed the legal minimum standards.
- Safe and healthy working conditions for all employees.
- The promotion of workers' rights in line with global labour rights standards.

## 9. Anti-Corruption and Fair Practices

We adhere to the principles of integrity and ethical business conduct in all recruitment activities. **BRANDPLUS PRECISION PLASTIC** prohibits any form of corruption, bribery, or unethical influence in the recruitment process. We ensure that our recruitment processes are fair and transparent at all levels.

## 10. Monitoring and Reporting

To ensure compliance with this policy, **BRANDPLUS PRECISION PLASTIC** will:

- **Monitor Recruitment Practices:** Regular internal audits and reviews of recruitment processes will be conducted to ensure adherence to standards and local laws.
- **Encourage Reporting:** Employees and candidates are encouraged to report any violations of this policy, including the use of recruitment fees, forced labour, or discriminatory practices, to the Human Resources Department or via an anonymous reporting channel.
- **Remediation:** Any violations of this policy will be investigated thoroughly, and corrective action will be taken, including the termination of business relationships with third-party recruitment agencies that violate this policy.

### III. Working Hours & Rest Day

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#### 1. Purpose

The purpose of this **Working Hours & Rest Day Procedure** is to establish clear guidelines regarding the working hours, break times, and rest days for employees at **BRANDPLUS PRECISION PLASTIC**. This procedure ensures compliance with local labour laws, promotes employee well-being, and helps maintain a balanced work-life environment.

#### 2. Scope

This procedure applies to all employees of **BRANDPLUS PRECISION PLASTIC**, including full-time, part-time, temporary, contract, and intern staff across all job roles and departments.

#### 3. Working Hours

Working hours refer to the time during which employees are required to be at work to perform their duties. The company adheres to the following guidelines:

##### 3.1 Standard Working Hours

- **Full-Time Employees:** The standard working hours are 9 hours per day, 5 days per week. Specific working hours will be communicated to employees based on their role and department needs.
- **Shift Workers:** For employees working in shifts, the work schedule may vary. Shift schedules will be communicated to employees in advance.
- **Flexibility:** **BRANDPLUS PRECISION PLASTIC** may offer flexible working arrangements, such as flexible start and end times or remote work, subject to the nature of the job and management approval.

##### 3.2 Overtime

All overtime must be **voluntary** and shall not be coerced or forced.

- **Overtime Definition:** Any work performed beyond the standard working hours is considered overtime and will be compensated in accordance with local labour laws and company policy.
- **Overtime Authorization:** Overtime must be pre-approved by the employee's supervisor or department head. Unauthorized overtime will not be compensated unless required in emergency situations.
- **Overtime Pay:** Employees will be compensated for overtime at a rate established by local labour laws or company policy.
- **Total Overtime Hour:** There is a maximum cap of 104 overtime hours per month to ensure employees are not overburdened with excessive work in line with labour laws.

##### 3.3 Breaks During Working Hours

- **Meal Breaks:** Employees working for more than 5 hours per day are entitled to a 1-hour or 30 mins breaks, subject to the nature of the job and management approval. Meal breaks are typically scheduled at the midpoint of the working day.
- **Rest Breaks:** Employees are entitled to a 30-minute rest break before continued their Overtime work. Breaks are scheduled to allow employees a chance to rest, refresh, and ensure productivity.

##### 3.4 Maximum Working Hours

- **Daily Limit:** In accordance with local labour laws, employees are not to exceed 10 working hours per day, including overtime.
- **Weekly Limit:** Employees are not to exceed 45 working hours per week, unless explicitly authorized under exceptional circumstances and in compliance with legal requirements.

#### 4. Rest Days

Rest days refer to the scheduled days when employees are not required to work. **BRANDPLUS PRECISION PLASTIC** ensures that employees receive adequate rest days in line with labour laws and industry best practices.

##### 4.1 Regular Rest Days

- **Standard Rest Day:** Employees are entitled to 1 rest day per week. Typically, may vary depending on the operational needs of the company.

##### 4.2 Public Holidays

- **Observed Public Holidays:** Employees are entitled to paid leave on public holidays observed by **BRANDPLUS PRECISION PLASTIC**, in accordance with local labour laws. If an employee is required to work on a public holiday, they will be compensated according to the overtime or holiday pay provisions in their contract or in line with labour laws.
- **Substitute Rest Day:** Employees working on a public holiday may be entitled to a substitute rest day (e.g., the following Monday), depending on the jurisdiction and company policy.

##### 4.3 Shift Workers and Rest Days

For employees working in shifts, rest days will be scheduled to ensure compliance with labour laws and to provide adequate recovery time between shifts. Shift workers may have varying rest days depending on their shift schedule.

#### 5. Special Considerations

Certain roles may require special scheduling considerations, such as:

- **Emergency or On-Call Work:** In situations where employees are required to be on-call or respond to emergencies, the company will ensure compliance with labour laws concerning compensation and rest periods.
- **Flexible or Remote Working Arrangements:** Where applicable, employees may be offered flexible working arrangements (e.g., remote work, flexible hours) based on the nature of their job and the department's needs.

#### 6. Compliance with Local and International Labour Laws

**BRANDPLUS PRECISION PLASTIC** is committed to complying with local, national, and international labour laws related to working hours and rest days. This includes adhering to maximum working hours, minimum rest periods, and providing rest days as required by law.

- **Overtime Compliance:** The company ensures that overtime is compensated according to legal standards, and employees are not required to work excessive hours without proper compensation.
- **Work-Life Balance:** We recognize the importance of work-life balance and aim to provide employees with a healthy and sustainable working schedule that respects their right to rest and recovery.

#### 7. Monitoring and Reporting

- **Tracking Working Hours:** Employee working hours will be monitored to ensure compliance with this procedure. Employees are required to accurately record their working hours, including overtime, on timesheets or via an electronic time-tracking system.
- **Reporting Violations:** If employees feel that their working hours or rest days are not being respected, they are encouraged to report the issue to their supervisor or HR department. The company will investigate any reports of non-compliance with this procedure.
- **Corrective Actions:** Any violations of the working hours or rest days procedure will be addressed promptly. Corrective actions may include changes to scheduling, compensation adjustments, or other measures to ensure compliance.

## IV. Wages & Benefits Procedure

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### 1. Purpose

The purpose of this **Wages & Benefits Procedure** is to establish clear and transparent guidelines for how wages and benefits are determined, administered, and communicated to employees at **BRANDPLUS PRECISION PLASTIC**. This procedure ensures that all employees receive fair compensation for their work and that benefits are managed in a way that supports employee well-being, in alignment with company policies, local labour laws, and best practices.

### 2. Scope

This procedure applies to all employees of **BRANDPLUS PRECISION PLASTIC**, including full-time, part-time, temporary, contract, and intern staff, across all departments and job roles.

### 3. Wages Procedure

Wages are determined based on a variety of factors, including role requirements, local labour market conditions, the individual's qualifications, experience, and performance. The company ensures that all wages comply with applicable local and national labour laws.

#### 3.1 Wage Structure

- **Salary Determination:** Salaries are determined based on the employee's role, level, and responsibilities, in line with **BRANDPLUS PRECISION PLASTIC**'s compensation structure.
- **Regular Pay Cycle:** Employees are paid on a regular cycle - monthly, with payments made by Direct Banking.
- **Overtime:** Where applicable, overtime will be paid according to local labour laws. Employees are entitled to overtime pay for hours worked beyond the standard working hours, as per company policies and applicable labour regulations.
- **Wage Transparency:** Employees are informed of their base salary, any applicable bonuses, and incentive structures at the time of hire or promotion. Employees should also receive written confirmation of their wages and any changes to them.
- **Minimum Wage Compliance:** The company ensures that wages meet or exceed the minimum wage requirements set by local and national labour laws.

#### 3.2 Payment of Wages

- **Pay Dates:** Pay dates are scheduled within 7 days after the cut-off date, and employees are informed in advance of any changes to the pay cycle.
- **Deductions:** Any deductions from an employee's salary (e.g., taxes, benefits premiums, social security, pension contributions) will be made in accordance with applicable laws and regulations.
- **Salary Increases:** Salary increases may be provided as part of performance reviews, promotions, or adjustments for inflation. These increases will be clearly communicated to employees, with justification based on performance, market trends, and company financial performance.

### 4. Benefits Procedure

**BRANDPLUS PRECISION PLASTIC** offers a comprehensive benefits package to its employees that aims to support their health, well-being, and work-life balance. The specifics of the benefits package may vary based on role, location, and length of employment.

#### 4.1 Types of Benefits

- **Paid Time Off (PTO):** Employees are entitled to paid time off, which includes annual leaves, sick leave, hospitalization leave, compassionate leave, marriage leave and public holidays. The amount of PTO granted may vary depending on the employee's role and tenure with the company.

- **Annual Leave:** Employees will accrue vacation days based on their length of service, with the total amount specified in the employee contract.
  - **Sick Leave & Hospitalization Leave:** Sick leave & Hospitalization leave is provided as per local labour laws. Employees must notify their supervisor as soon as possible when they are unable to work due to illness.
  - **Maternity Leave:** Any Female employee covered under the **Employment Act 1955** (as amended in 2022) have worked for the employer **for at least 90 days** in the 9 months immediately before expected confinement are entitled to 98 consecutive days of maternity leave. Maternity leave may begin up to 30 days prior to the expected confinement date and must begin no later than the day of delivery.
  - **Paternity Leave :** Any Male employee who have been **legally married** to the mother of the child and employed for 12 months or more are entitled to 7 consecutive days of paternity leave and notify the employer about the pregnancy at least 30 days before the expected confinement, or as soon as possible after the birth
  - **Compassionate Leave :** Employees will be entitled for the Compassionate leave as per company policy
  - **Marriage Leave :** Employees will granted Marriage Leave in alignment with company policy.
  - **Public Holidays:** **BRANDPLUS PRECISION PLASTIC** observes yearly Public Holidays, with paid time off provided for these holidays.
- **Retirement Benefits:** Employees are provided with retirement or pension benefits in accordance with local laws and the company's retirement plans. This may include company matching contributions or other retirement savings plans.
  - **Bonus & Incentive Programs:** Employees may be eligible for performance-based bonuses, incentives, or profit-sharing schemes, depending on their role and contribution to the company's success. These will be clearly outlined in the employee's contract or job offer.
  - **Training & Development:** Employees may be entitled to professional development benefits, including training programs, courses, and certifications, as per the company's policies and budget.
  - **Other Benefits:** Additional benefits may include shift allowance, transportation allowances, flexible working arrangements, depending on the role and local laws.

#### 4.2 Enrolment and Eligibility

- **Eligibility:** Eligibility for benefits is determined based on employment status (full-time, part-time, temporary) and duration of employment. New employees will be provided with a benefits package detailing their eligibility and enrolment instructions.
- **Enrolment:** Employees will be required to complete enrolment forms for benefits such as health insurance, retirement plans, and other applicable benefits during the onboarding process or at the time they become eligible for such benefits.

#### 4.3 Changes to Benefits

- Employees will be notified of any changes to the benefits package or eligibility criteria in advance, such as plan renewals, policy changes, or changes to the company's benefits offering.
- Changes to employee benefits may also occur due to changes in local laws or regulations that affect the provision of benefits.

#### 5. Communication and Documentation

- **Employee Handbook:** All employees will receive a copy of the **Employee Handbook**, which includes details about the company's wages and benefits, including eligibility, enrolment instructions, and the procedures for making claims or changes to benefits.
- **Wage and Benefits Statements:** Employees will receive a payslip outlining their wages, deductions, and benefits on a regular basis. This payslip will include clear details on wages, overtime, and benefits contributions.
- **Access to Information:** Employees will have access to information about their wages, benefits, and any changes via internal platforms such as the HR department, or direct supervisor.

## 6. Compliance and Legal Obligations

**BRANDPLUS PRECISION PLASTIC** ensures that all wages and benefits comply with local, national, and international labour laws, including but not limited to:

- **Minimum Wage Laws:** Adherence to legal minimum wage requirements.
- **Taxation Laws:** Compliance with all relevant tax regulations, including withholding taxes from wages.
- **Benefits Entitlement Laws:** Compliance with statutory benefits laws, such as Perkeso, KWSP contributions, and EIS.
- **Non-Discrimination:** We ensure that wages and benefits are offered in a fair and equitable manner to all employees, irrespective of their gender, race, ethnicity, or any other characteristic.

## 7. Monitoring and Auditing

**BRANDPLUS PRECISION PLASTIC** will regularly monitor the implementation of the wages and benefits procedure to ensure that all employees are fairly compensated and that benefits are being properly administered. Audits will be conducted periodically to confirm compliance with relevant laws and internal policies.

## 8. Dispute Resolution

If employees have concerns regarding their wages or benefits, they should first attempt to resolve the issue through their immediate supervisor or HR representative. If the issue remains unresolved, employees may follow the company's grievance procedure to ensure that concerns are addressed fairly and transparently.

## V. Disciplinary Procedure

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### 1. Purpose

This procedure outlines the steps to be taken in the event of employee misconduct, ensuring fairness, consistency, and compliance with Malaysian labour laws.

### 2. Scope

This procedure applies to all employees (permanent, contract, temporary, and probationary) within **BRANDPLUS PRECISION PLASTIC**.

### 3. Principles

- All disciplinary matters will be handled fairly, consistently, and promptly.
- Employees will be informed of allegations against them and given the opportunity to respond.
- Investigations and disciplinary actions will comply with the **Employment Act 1955**, **Industrial Relations Act 1967**, and the **Code of Conduct for Industrial Harmony 1975**.

### 4. Types of Misconduct

#### A. Minor Misconduct

No.	Misconduct	Description
a.	Tardiness / Late Attendance	Frequently arriving late for work without valid reason or notification.
b.	Absenteeism (Without Prior Notice)	Taking leave without approval or informing the supervisor.
c.	Extended / Unauthorised Breaks	Taking longer breaks than permitted or unauthorized meal/rest breaks.
d.	Failure to Follow Instructions	Minor instances of not following supervisor's instructions or work procedures.
e.	Dress Code Violation	Not wearing uniform, PPE, or other required attire while on duty.
f.	Carelessness / Negligence	Minor mistakes or lapses that do not result in serious damage or injury.
g.	Disruptive Behaviour	Talking loudly, gossiping, or causing distraction to others during work.
h.	Use of Mobile Phone on Production Floor	Using mobile phones in restricted areas or during working hours without permission.
i.	Smoking in Non-Smoking Areas	Violating company smoking policies.
j.	Failure to Clock In/Out Properly	Not recording attendance via punch card or digital system as required.

Disciplinary Actions for Minor Misconduct. Progressive discipline is recommended for minor misconduct:

- First Offense** – Verbal Warning
- Second Offense** – Written Warning
- Third Offense** – Final Warning
- Repeated Offense** – May lead to suspension or escalation to major misconduct depending on severity

#### B. Major Misconduct

No.	Misconduct	Description
1.	Theft / Fraud	Stealing company property, tools, inventory, or falsifying records for personal benefit.
2.	Violence / Fighting	Physical assault, threats, or any form of violent behaviour towards colleagues or supervisors.

No.	Misconduct	Description
3.	Gross Insubordination	Deliberate refusal to obey legitimate instructions or defying authority in a hostile manner.
4.	Harassment	Sexual, verbal, or physical harassment, bullying, or discrimination of any kind.
5.	Substance Abuse	Being under the influence of alcohol or drugs during work hours or on factory premises.
6.	Sabotage	Intentional damage to machinery, tools, raw materials, or production processes.
7.	Gross Negligence	Serious carelessness causing injury, loss, or production disruption.
8.	Breach of Safety Rules	Wilful violation of critical safety protocols endangering life or property.
9.	Confidentiality Breach	Sharing trade secrets, production data, or internal communications with unauthorized parties.
10.	Falsification of Documents	Altering attendance records, forging signatures, or manipulating reports.
11.	Criminal Conduct	Any act that violates Malaysian law, whether on or off duty, affecting the company's reputation.
12.	Sexual Misconduct	Unwelcome physical contact, lewd comments, or inappropriate behaviour in the workplace.

## 5. Disciplinary Process for Major Misconduct

### Step 1: Preliminary Investigation

- Supervisor reports the alleged misconduct to HR.
- A preliminary investigation is conducted.
- Statements from witnesses and related documents are collected.

### Step 2: Show Cause Letter

- A formal *Show Cause Letter* is issued.
- The employee must respond in writing within **3–5 working days**.

### Step 3: Domestic Inquiry (if applicable)

- Form a panel (3 impartial members).
- Ensure:
  - Employee receives notice of inquiry.
  - Right to be heard and call witnesses.
  - Transparent hearing and fair documentation.
- Record findings and recommendations.

### Step 4: Decision & Action

Based on findings:

- Based on DI findings and company policy:
  - Verbal / Written / Final Warning
  - Suspension (with or without pay)
  - Demotion / Transfer
  - **Dismissal (only with just cause or excuse)**

**The disciplinary actions shall not include monetary penalties or deductions from wages as a form of punishment.**

### Step 5: Appeal

- The employee may appeal in writing within **5 - 7 working days**.
- Senior Management or appeals panel will re-evaluate the case and communicate the outcome.

## VI. Harassment Policy

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### 1. Purpose

**BRANDPLUS PRECISION PLASTIC** is committed to maintaining a workplace is free from harassment and discrimination. This policy aims to create a safe, respectful and productive environment for all employees, where everyone is treated with dignity and fairness. Harassment of any kind, whether based on race, gender, religion, sexual orientation, or other personal characteristics, is not tolerated. This policy outlines our commitment to preventing harassment and ensuring appropriate actions are taken if harassment occurs and thorough investigation of any reported incidents.

### 2. Scope

This policy applies to all employees, contractors, interns, vendors, visitors, and anyone else who interacts with **BRANDPLUS PRECISION PLASTIC** in the course of its business operations, regardless of location. It covers both in-person and virtual interactions in the workplace, at work-related events, and through any communication channels used by the company (e.g., email, social media, video conferences).

### 3. Definition of Harassment

Harassment is defined as unwelcome conduct that creates an intimidating, hostile, or offensive work environment. It can occur through verbal, non-verbal, physical, or online behaviour, and it may involve conduct based on one's :

- Race or ethnicity.
- Gender, gender identity, or sexual orientation.
- Religion or belief.
- Disability or medical condition.
- Age.
- National origin or citizenship.
- Other protected characteristics as defined by local, regional, or national law.

It includes but is not limited to:

- **Verbal harassment:** Offensive jokes, slurs, threats, or derogatory comments
- **Physical harassment:** Inappropriate physical contact, such as touching, patting, hugging, or any other physical intimidation.
- **Sexual Harassment:** Unwelcome sexual advances, comments or inappropriate behaviour of a sexual nature.
- **Non-verbal harassment:** Gestures, offensive images, or lewd behaviour.

### 4. Prohibited Behaviour

**BRANDPLUS PRECISION PLASTIC** prohibits all forms of harassment, including:

- **Sexual Harassment:** Unwelcome sexual advances, requests for sexual favours, or other verbal or physical conduct of a sexual nature.
- **Racial Harassment:** Discriminatory or offensive behaviour based on an individual's race or ethnicity.
- **Gender Harassment:** Comments or actions that disparage an individual based on their gender, gender identity, or sexual orientation.
- **Religious Harassment:** Disrespect, mockery, or exclusion based on an individual's religious beliefs or practices.
- **Disability Harassment:** Discriminatory comments, jokes, or behaviour directed at a person's physical or mental disabilities.
- **Bullying:** Repeated mistreatment of an individual that may include verbal abuse, offensive conduct, or behaviours that cause emotional or physical harm.

### 5. Responsibilities of Employees

- **Respect:** Every employee is expected to treat others with respect and dignity. No employee should engage in any form of harassment, whether intentional or unintentional.
- **Reporting:** Employees are encouraged to report any incidents of harassment they witness or experience. Reporting can be done directly or through a confidential channel, such as a designated HR contact or whistle blower hotline.
- **Support:** Employees should support colleagues who report harassment, ensuring they understand their rights and are treated fairly throughout the process.

## 6. Reporting Harassment

Employees who believe they have experienced harassment or witnessed it should report the issue promptly. Reports can be made to any of the following:

- **Human Resources:** 07- 8616286 ext : 260/267
- **Supervisor or Manager**
- **Confidential Hotline/Email:** [Admin1@bpp.com.my](mailto:Admin1@bpp.com.my) or [may.teo@bpp.com.my](mailto:may.teo@bpp.com.my) for anonymous reporting].

Reports will be treated confidentially to the extent possible, and employees are encouraged to report incidents as soon as they occur, even if they are unsure whether the behaviour qualifies as harassment.

## 7. Investigation and Resolution

Upon receiving a report of harassment, **BRANDPLUS PRECISION PLASTIC** will take the following steps:

- **Investigation:** We will promptly investigate any reported incident of harassment, ensuring a fair and impartial review of the situation. This will include interviewing the involved parties, reviewing evidence, and providing an opportunity for both the complainant and the alleged harasser to present their side.
- **Confidentiality:** All harassment complaints and investigations will be handled confidentially, with information shared only on a need-to-know basis to ensure a thorough investigation.
- **Outcome:** If the harassment claim is substantiated, appropriate corrective action will be taken, which may include counselling, training, suspension, or termination of employment, depending on the severity of the incident.

## 8. Non-Retaliation

**BRANDPLUS PRECISION PLASTIC** has a **zero-tolerance policy for retaliation**. Employees who report harassment or participate in an investigation will not face any adverse actions, including dismissal, demotion, or any form of mistreatment. Any employee found to have retaliated against someone who has reported harassment will face disciplinary action, up to and including termination.

## 9. Corrective Actions and Consequences

If an employee is found to have engaged in harassment, the company will take appropriate corrective action, which may include:

- **Verbal or written warning.**
- **Counselling or training.**
- **Suspension from work.**
- **Termination of employment** in the case of severe or repeated harassment.
- **Legal action**, where applicable.

The severity of the action will depend on the nature and impact of the harassment.

## VII. Anticorruption Policy

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### 1. Policy Statement

BPP conducts all of its business in an honest and ethical manner and in full compliance with the law. When doing business anywhere in the world, neither BPP nor its affiliates, nor any entity or person associated with BPP, shall offer, promise, pay, authorize, request, accept or agree to receive a bribe, kickback or other illicit payment or benefit in violation of the Malaysia Law or the anticorruption laws of any other country in which we do business.

### 2. Scope

"This policy applies to BPP and its direct and indirect subsidiaries, joint ventures and affiliates (collectively the ""Company""), all officers, directors and employees of the same. The Policy prohibits corrupt payments made directly by the Company, as well as indirect payments made on behalf of the Company by sales agents, distributors or any other third party (collectively referred to as ""Third Parties"").

### 3. Administration of the Policy

BPP's Compliance Officers shall be responsible for administering and interpreting the policy, in accordance with the BPP Code of Ethics, under the oversight of the Business Ethics and Compliance Committee ("BECC") and the Audit Committee. The Compliance Officers shall provide reports to the BECC and the Audit Committee of the Board of Company's effort to ensure compliance with this Policy, the SPRM and other anticorruption Directors on the laws.

### 4. Anticorruption Policy Requirements

- a. **Bribery Prohibited.** All BPP employees and Third Parties must comply with the SPRM, Malaysia Law and all applicable anticorruption laws.
  - i. BPP employees and Third Parties shall not offer, pay, promise or authorize any bribe kickback or illicit payment or benefit of any kind, to any government official
  - ii. No BPP employee shall request, accept or agree to receive any bribe, kickback, or illicit payment or benefit of any kind, from any customer, supplier, or any other person or entity.

An improper payment or offer can be anything of value, including gifts, travel, entertainment, and money given to influence another party's actions. Examples of improper actions under the anti-bribery provision of this Policy include, but are not limited to, the following :

- i. Payment or offer payment to influence a Government Official's decision to award a contract or other business opportunity to BPP ;
  - ii. Payment or offer of payment to influence a Government Official's decision to issue any government authorization or documentation, such as any approval, permit or licence;
  - iii. Payment or offer of payment to influence a Government Official's decision to relieve BPP of otherwise required government obligations, such as paying taxes, passing inspections and obtaining required permits; and
  - iv. Payment or offer of payment to influence a Government Official to influence legislation or any judicial proceeding.
- b. **Books, Records, Internal Controls and Transactions.** All Company books and records must be maintained in an accurate and complete manner that records all payments in a way that does not conceal their true nature. Failure to do so is an independent violation of this Policy and the law. The law also requires that we establish a system of internal accounting controls to provide reasonable assurance to management of the type of financial transactions undertaken by the Company and its employees. This requirement applies to all BPP transactions, but employees should take special care to ensure that any transaction of BPP funds related to any Government Official is authorized and accurately documented, regardless of the amount of such transaction.

In addition to the SPRM, the Company and its employees should be in compliance with other anticorruption laws and regulations. In the event local anticorruption laws or regulations are stricter than the SPRM or BPP policies, then local law or regulations must be followed.

Examples of improper actions under the books and records provision of this Policy include, but are not limited to :

- i. Off-balance sheet or otherwise unrecorded funds established for any purpose; and
- ii. An accounting record or document that falsifies or disguises the true nature of a transaction.

## 5. Government Officials

- a. **Broad Definition of “Government Officials”.** This Policy applies to payments to any Government Official, Government Official, regardless of rank or position, and payment to family members, business associates, business entities, charities, or other individuals/entities who receive payments on behalf of a Government Official is also prohibited by the policy.

The definition of a Government Official is very broad and includes but is not limited to :

- i. Any employee of any federal, state, provincial, country or municipal government or government department or agency;
- ii. Any officer or employee of any commercial enterprise that is owned or controlled by a government, including employees of government-run hospitals;
- iii. Any officer or employee of any public international organization, such as the international Monetary Fund, the European Union, and the World Bank; and
- iv. Any person action in an official capacity for any government, agency, enterprise or organization identified above or otherwise.

## 6. Dealing with third parties

- a. **Indirect Payments Prohibited.** The Company and its employees may be held liable for indirect offers, promises or payments to Government Officials to obtain or retain business, direct business to any person or gain any improper business advantage. Consistent with the SPRM and other applicable laws, the Company prohibits corrupt activities through Third Parties. The Company shall take reasonable precautions to ensure that Third Parties comply with this Policy, including through the exercise of Due Care, as defined below, in entering into contractual relationships with Third Parties to ensure they are reputable, honest, and qualified for their roles, and monitor activity when deemed necessary.

- b. **Due Care.** The definition of Due Care when dealing with Third Parties for purposes of the Policy includes, but is not limited to using written contracts which :

- i. Contain confirmation that the Third Party will comply with anti-corruption laws;
- ii. Describe the services rendered in detail;
- iii. Set forth the payment terms; and
- iv. Have reviewed and approved by the BPP Legal Department

Additionally, the Company requires periodic written acknowledgement of anticorruption compliance from Third Parties

- c. **Wilful Blindness Prohibited.** In dealing with any Third Parties, Company employees must be aware of any indication that such Third Party may be making corrupt payments. Any such indication must be reported in accordance with this Policy. Under no circumstances may employees of the Company ignore signs that any Third Party may be making corrupt payments in connection with any venture, transaction or activity in which the Company is involved or has any interest. Common red flags that you should be aware of include, but are not limited to :

- i. Third-party agents with poor reputations;
- ii. Distributors or agents who refuse to certify compliance with anti-corruption laws;
- iii. Unusual payment terms that may be indicative or corruption :
  1. Upfront Payments
  2. Cash payments
  3. Abnormally high pricing or commissions
  4. Involvement of third parties or shell entities

- d. **Acquisition Due Diligence.** To the extent BPP pursues the acquisition of an entity with any operations or activities outside of the Malaysia, the risk based due diligence approach associated with the proposed acquisition shall include, to the extent possible, an appropriate review of the target's compliance with anticorruption laws. On or after the completion of the acquisition, the target shall be integrated into the Company's Compliance Program.

## **7. Facilitation Payment Prohibited**

"Facilitation payments" are small payments made to low-level Government Officials to secure a routine governmental action. Such payments are not permitted under this Policy.

## **8. Gifts and Hospitality**

- a. Gifts and hospitality shall not be given, directly or indirectly to Government Officials to improperly influence or reward an official act or decision or as an actual or intended quid pro quo for any benefit to the Company.
- b. Gifts and hospitality promised, offered or provided on behalf of the Company to a Government Official must be modest in value, in accordance with customary courtesies, and lawful under applicable laws, including SPRM and local law.
- c. Gifts must comply with the following standards :
  - i. Cash or cash equivalents may never be given;
  - ii. Items given must be less than RM100.00 in value unless approved in writing by the Legal Department
  - iii. Items given must be related to a health care provider's practice, benefit patients, or serve a genuine educational function.
- d. Hospitality must comply with the following standards :
  - i. Entertainment or recreational events or activities may not be provided or paid for;
  - ii. Hospitality in the form of modest meals or refreshment may be provided if incident to a legitimate business or scientific discussion such as a medical educational presentation or a business meeting. Hospitality must be provided in a manner that is conducive to the business or scientific discussion.

## **9. Political Contributions**

BPP's Code of Ethics prohibits the contribution of Company funds to Government Officials. Employee's involvement and participation in the political process must be on an individual basis, on their own time and at their own expense.

## **10. Charitable Donations**

The Company only makes charitable donations that are legal under the SPRM and applicable local laws. Charitable donation requests must be made in writing and submitted to Managing Director for approval.

## **11. Penalties and Discipline**

Employees and Third Parties who violate this Policy or applicable anticorruption laws will be subject to discipline, up to and including termination of employment or services. Additionally, employees and Third Parties who violate this Policy or applicable anticorruption laws may be personally subject to severe criminal and civil penalties, imprisonment, and/or fines which are not reimbursable by the Company.

## **12. Training and Communication**

The Company, from time to time, shall provide appropriate anticorruption training to employees and designated Third Parties through a risk based approach.

## **13. Reporting Violations**

Employees are required to report actual or suspected violations of this Policy, the SPRM and other applicable anticorruption laws by any employee or Third Party on behalf of BPP. Employees may not be subjected to retaliation for good faith reports of suspected violations. Any violation may be reported to the BPP Legal or Internal Audit departments, the Compliance Officers.

## VIII. Escalation Policy

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### 1. Introduction

Brandplus Precision Plastic Sdn Bhd Ethics and Conduct Guide, BPP Compliance Manual and Human Resource policies (collectively “BPP Policies”) comprise the framework under which BPP and its associates (“Associates”) conduct business. Associates are responsible to comply with the terms and spirit of these BPP Policies, to report incidents or violations as specifically indicated in the BPP Policies and to participate in any subsequent reviews deemed necessary.

### 2. Policy Statement

BPP has created this Escalation Policy (“Policy”) to assist Associates with their reporting requirements under the various BPP Policies and to ensure proper evaluation and escalation of identified incidents or violations.

For external or internal incidents or violations that are not contemplated by existing policy, procedure or guidance, BPP Safety & Health Committee (“Committee”) has been charged with the responsibility of addressing these other issues. Upon an issue being reported, the Committee will perform a brief assessment to determine the appropriate channel and resources for further evaluation, management and remediation. Once that determination has been made, the Committee will coordinate remediation of the issue, with all relevant information, to the appropriate parties. Issues escalated according to this Policy will be treated as sensitive and will be discussed on a need-to-know basis with business unit management and BPP Compliance, Legal and Human Resources Departments, as appropriate.

### 3. Procedure

Requirements:

- Associates should review and consult the applicable BPP Policies related to the area of concern and follow any specific escalation requirements detailed within those documents.
  - Associates should follow the requirements specifically indicated within the relevant BPP Policy. If a BPP Policy does not clearly identify or contemplate how to escalate a specific incident or violation, Associates should contact the Compliance Subject Matter Expert or policy owner noted on the policy.
- If an Associate is unsure as to how to best escalate a particular incident or violation, the Associate should :
  - Contact his/her Manager (If the issue to be escalated is related to wrongdoing or misconduct, in which an Associate believes his/her manager is involved, the associate should contact his/her manager’s manager, BPP Human Resources Department or Compliance Department directly). Managers, in turn, are responsible for escalating issue reported which are beyond the scope of their responsibilities and/or expertise or have potential firm-wide implications, to the Committee or other BPP contact. Managers are also responsible for informing their management of issues that other Associates may raise.
  - Associates are encouraged to report incidents or violations as described above, however, Associates may also use Ethics Point, the Compliance and Ethics Reporting Tool. Ethics Point provides for online or telephone reporting to HRA department. Associates can contact their manager or a member of BPP Compliance, Legal and Human Resources Department for assistance.

Associates may exercise their rights to directly contact any regulatory authority, government agency or entity, to report possible violations of law or make other disclosures under applicable whistle-blower laws. Nothing in this policy is intended or should not be construed to restrict, discourage or interfere with communications or actions protected or required by state or federal laws or regulations. Associates do not need prior authorization of BPP or their management to make any such reports or disclosures and will not be retaliated against for making such reports or disclosures.

### 4. Conflict Resolution and Escalation Process

Associates should immediately report any issues they believe are a potential or actual breach of this Policy to their relevant business unit management and Director. The Director or designee will review the matter and determine whether the issue is an actual breach and whether to grant an exception, and/or the appropriate course of action. When making such determination, the Director may as part of his/her review, discuss the matter with relevant business unit management, members of the Senior Management Team, governance committees.

The Compliance Department can grant exceptions to any provision of this Policy so long as such exceptions are consistent with the purpose of the Policy and applicable law, are documented and such documentation is retained for the required retention period.

**IX. Others**

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**Review and Amendments**

The terms and conditions in this handbook will be reviewed, amended, or supplemented at the Company's discretion from time to time to ensure continued effectiveness and compliance with applicable laws. Employees will be informed of any changes, and updates will be communicated through official company channels.

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**PERSONAL IDENTIFICATION (ID) CONSENT FORM**

**Date:**

**Name of Individual:** \_\_\_\_\_

**ID Type (e.g., Passport, National ID, Driver’s License):** \_\_\_\_\_

**ID Number:** \_\_\_\_\_

**Issuing Country:** \_\_\_\_\_

**Date of Expiry:** \_\_\_\_\_

**Purpose of Collection:**

This information is being collected for the purpose of:

- Identity verification
- Employment / recruitment processing
- Background checks (if applicable)
- Legal and compliance purposes
- Recordkeeping in accordance with applicable laws and regulations

**Consent Statement:**

I, the undersigned, hereby give my **explicit consent** to **BRANDPLUS PRECISION PLASTIC SDN BHD** to:

- Collect, store, use, and process my personal identification information for the purposes stated above.
- Retain a copy of my ID document(s) as required by law or internal company policy.
- Share my ID details only with relevant third parties (e.g., government authorities, background check providers) when legally necessary or with my further written permission.

I understand that my personal information will be handled confidentially and securely in accordance with data protection laws

I also understand that I may withdraw my consent at any time by notifying **BRANDPLUS PRECISION PLASTIC SDN BHD** in writing, subject to legal or contractual obligations.

**Signature :** \_\_\_\_\_

**Full Name :** \_\_\_\_\_

**Date :** \_\_\_\_\_

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**Company/Organization Use Only**

Received by : \_\_\_\_\_

Position : \_\_\_\_\_

Date Received : \_\_\_\_\_


 **Worker Grievance Form**

Company Name: **BRANDPLUS PRECISION PLASTIC SDN BHD**

Department / Location: \_\_\_\_\_


Date of Submission: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

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 **1. Worker Information** *(Optional – may be anonymous)*

- **Name (optional):** \_\_\_\_\_
- **Employee ID (if applicable):** \_\_\_\_\_
- **Contact Number (optional):** \_\_\_\_\_

I wish to remain anonymous

 **2. Nature of Grievance**

(Please tick the relevant category)

- Salary / Wages
- Overtime / Working Hours
- Discrimination / Harassment
- Supervisor / Management Treatment
- Dormitory / Housing Issues
- Safety / Health Hazards
- Food / Canteen
- Leave / Time-off
- Others: \_\_\_\_\_

 **3. Details of Complaint**

Please describe the issue in detail (include dates, names, locations, etc. if known):

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 **4. Have You Reported This Before?**

- Yes
- No

If yes, to whom? \_\_\_\_\_

When? \_\_\_\_\_

Was any action taken?  Yes  No

If yes, what was the result? \_\_\_\_\_

 **5. Suggested Resolution (Optional)**

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**For HR / Management Use Only**

<b>Action Taken</b>	<b>Description</b>
Date Received	
Investigation Conducted?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Investigation Findings	
Action Taken	
Date of Resolution	
Feedback Given to Worker	<input type="checkbox"/> Yes <input type="checkbox"/> No
Case Closed	<input type="checkbox"/> Yes <input type="checkbox"/> No

**Handled By (Name/Position):** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_ / \_\_\_\_ / \_\_\_\_

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**Confidentiality Note:**

This grievance will be handled confidentially. Retaliation against any worker submitting a complaint is strictly prohibited and may result in disciplinary action against the offender.