



# Code of Conduct & Ethics

**Issued by:** Matchlink Sdn Bhd

**Applies to:** All employees, contractors, and personnel deployed under Matchlink, including those stationed at client sites

# Purpose

This Code of Conduct & Ethics sets the behavioral, legal, and ethical expectations for all employees representing Matchlink, including those operating at client premises. It ensures all employees act with integrity, professionalism, and accountability, preserving the reputation and trust of both Matchlink and its clients. This Code is not exhaustive, and Matchlink management reserves the right to interpret, amend, or enforce additional standards where necessary.

## Core Values

Matchlink personnel are expected to uphold the following guiding principles:

- **Integrity:** Be honest, fair, and transparent in all dealings. Never misrepresent facts or act with hidden motives.
- **Respect:** Treat clients, colleagues, superiors, and subordinates with dignity, regardless of race, gender, role, or background.
- **Responsibility:** Own your tasks, mistakes, and professional growth. Do not shift blame or evade accountability.
- **Professionalism:** Demonstrate competence, punctuality, proper attire, and courteous communication at all times.
- **Confidentiality:** Protect company, client, and stakeholder information. Do not disclose or misuse confidential material.
- **Compliance:** Follow all applicable laws, Matchlink policies, and client-specific regulations and instructions.

# General Conduct

All employees are required to maintain a high standard of professional and ethical behavior, especially when representing Matchlink at client sites. Your actions must reflect positively on both **Matchlink Sdn Bhd** and the **designated client** you are deployed to. The following expectations apply:

- **Act lawfully, ethically, and respectfully** at all times, both on and off duty.
- **Comply fully** with instructions, policies, and procedures issued by Matchlink and the designated client.
- **Preserve the reputation** of both Matchlink and the designated client through responsible behavior, language, and appearance.
- **Dress professionally** in accordance with the environment and expectations of the client site.
- **Avoid toxic conduct**, such as gossiping, backbiting, or spreading negativity in the workplace.
- **Do not misuse company or client resources** (e.g. vehicles, phones, systems) for personal gain or unauthorized purposes.
- **Uphold a cooperative and respectful attitude**, especially when working in cross-functional or multicultural teams.

This list is not exhaustive. Management reserves the right to determine what constitutes misconduct or inappropriate behavior.

# Workplace Behavior

The following are **strictly prohibited** and may result in disciplinary action, including termination. This list is **not exhaustive**, and Matchlink reserves the right to determine what constitutes unacceptable behavior based on the context and severity:

- **Verbal abuse, threats, or intimidating behavior** toward colleagues, supervisors, clients, or vendors
- **Sexual, racial, religious, or any form of harassment or discrimination**
- **Persistent lateness, absenteeism, or failure to notify supervisors of absence**
- **Insubordination or refusal to follow reasonable instructions** from Matchlink or the designated client
- **Theft, misappropriation, misuse, or vandalism** of company/client property — including digital tools and data
- **Use of vulgar, profane, or offensive language or gestures**, whether verbally or in written communication
- **Spreading rumors, false information, or engaging in malicious gossip** that disrupts workplace harmony
- **Excessive or disruptive personal phone use**, including loud calls, social media browsing, or watching videos during work hours
- **Accessing restricted areas or systems** without permission or proper clearance
- **Deliberate sabotage, tampering, or damaging company/client systems or assets**
- **Working while under the influence of alcohol, drugs, or any intoxicating substance**, or bringing such substances to work
- **Falsifying records or documents**, such as timesheets, medical certificates, or work reports
- **Abuse or misuse of leave policies**, including feigning illness or using emergency leave for personal leisure
- **Unauthorised removal, copying, or sharing of confidential documents or proprietary data**
- **Using company/client credentials to access external platforms or for personal benefit**
- **Engaging in fighting, physical altercations, or unsafe horseplay** on work premises
- **Using client or Matchlink branding without approval**, including in personal social media
- **Posting defamatory, misleading, or disrespectful content** on social media that targets Matchlink, clients, colleagues, or the nature of the assignment
- **Sharing confidential or internal information** — including photos of client offices, sensitive correspondence, or proprietary systems — on social media or any public platform

- **Engaging in activities that create a conflict of interest** or damage trust with clients
- **Failure to adhere to safety protocols**, endangering self or others

All employees are expected to behave in a way that promotes a respectful, safe, and professional work environment — online and offline. If uncertain whether a behavior or post is appropriate, consult HR before proceeding.

## Conflict of Interest

Employees must avoid any personal, financial, or relational circumstances that could compromise — or appear to compromise — their ability to make fair, unbiased decisions in the best interest of Matchlink and its designated clients. Employees must remain **independent in thought and action**, and maintain professional integrity at all times.

**A conflict of interest may arise when:**

- **Personal interests interfere with work duties**, responsibilities, or decision-making.
- **Outside relationships** or financial ties influence how you interact with vendors, clients, or colleagues.
- **You use your position** at Matchlink or the client site to benefit yourself, family, or friends.

**Examples of prohibited or questionable conflicts:**

- Running a **side business or freelance work** during office hours or that drains your focus or energy from assigned tasks.
- Working **part-time, freelance, or consultatively** for a **direct competitor, client, or vendor** without written approval from Matchlink.
- Having **close personal, family, or romantic relationships** with individuals from vendors, competitors, or within client companies where you have influence or oversight.
- **Making business decisions** that benefit someone you have a personal relationship with, including awarding contracts or recommending vendors.
- **Accepting personal discounts, expensive gifts, tickets, or entertainment** from a vendor, supplier, or client without declaration and approval.
- **Investing in or holding shares** in a company that does business with, or competes against, Matchlink or its clients — especially if your job gives you access to inside information.

### Disclosure Requirement:

All employees are required to **promptly disclose** any actual, potential, or perceived conflict of interest to HR or their direct supervisor. Early disclosure helps prevent any misunderstanding, disciplinary action, or legal implications.

Failure to disclose a conflict may lead to disciplinary measures, including termination

Employees must remain **independent**, avoid biased decision-making, and **disclose** all potential conflicts to Matchlink HR for evaluation and approval.

## Confidentiality & Data Protection

As a Matchlink employee — especially when deployed to client sites — you are entrusted with sensitive and confidential information. This includes, but is not limited to, business strategies, client records, financial data, HR and payroll information, internal communications, project plans, vendor agreements, and proprietary technology or processes.

It is your **ethical and legal duty** to protect this information at all times. Breaches of confidentiality can cause severe reputational damage, legal consequences, or loss of business for both Matchlink and its clients.

### You must:

- **Not disclose** any confidential information to unauthorized parties — including family members, friends, ex-employees, or unrelated colleagues — whether during or after your employment.
- **Avoid casual discussion** of sensitive topics in public places such as lifts, cafes, taxis, or public transport.
- **Never copy, download, save, or transfer** company or client files to personal email accounts, USB drives, external cloud storage, or personal devices — even for convenience.
- Only use **authorized, company-approved devices, platforms, and software** when accessing, storing, or transmitting confidential data.
- Immediately **report any data breaches**, unauthorized access, misplaced devices, or suspicious emails to Matchlink HR and/or the client's IT/security department.
- Take all reasonable precautions such as using strong passwords, locking your computer screen when unattended, and avoiding use of unsecured public Wi-Fi networks.
- Comply fully with the **Personal Data Protection Act (PDPA)** and any **client-specific data protection or cybersecurity protocols** — including NDA clauses, data access restrictions, and document handling procedures.

**Prohibited Actions Include:**

- Sharing screenshots or documents from internal systems.
- Discussing client projects on social media or messaging apps.
- Sending files or data to personal messaging platforms (e.g., WhatsApp, Telegram).
- Uploading work-related content to personal drives (e.g., Google Drive, Dropbox).

**Violation of confidentiality** — whether intentional or through negligence — is a serious offense and may result in immediate termination and legal action.

## Use of Company Resources

All tools, equipment, and digital infrastructure provided by **Matchlink** or our **designated clients** — including but not limited to workstations, laptops, mobile devices, software, email accounts, access cards, internal systems, and internet connections — are the property of the company or client and must be used **exclusively for authorized business purposes**.

Misuse of these resources may compromise security, breach trust, or violate laws, and will be subject to disciplinary action.

**Employees must:**

- **Use all hardware and software responsibly**, ensuring it is used only for work-related functions, and not altered or tampered with.
- **Keep login credentials secure** and never share passwords with anyone, including colleagues, friends, or family.
- **Report lost, damaged, or stolen devices or access cards** immediately to both Matchlink and the client (if issued by them).
- **Access only the systems, files, or tools necessary for your role** — do not explore restricted folders, confidential emails, or databases not relevant to your assignment.
- **Keep company-issued devices clean and in working condition**, and return them upon resignation, contract end, or reassignment.

**Strictly Prohibited Actions Include:**

- Installing unauthorized software, plugins, games, or third-party apps on any company/client device or system.
- Using work email for personal communication, online shopping, job hunting, or forwarding non-work-related content.

- Accessing or viewing inappropriate content, including pornographic, gambling, hate speech, or extremist material.
- Connecting personal devices (e.g., USB drives, smartphones) to the network or machines without approval.
- Sharing, lending, or transferring company/client resources to any non-employee — including ID cards, laptops, email accounts, or work phones.
- Using any system or device to run a **side business**, conduct freelancing, or perform non-authorized paid work.

All digital activity conducted using company or client systems is subject to **monitoring and audit**, and users have **no expectation of privacy** when using these resources. Any misconduct or violation may lead to disciplinary action including termination and, if applicable, criminal prosecution.

## Anti-Bribery, Gifts & Gratification

Matchlink enforces a **strict zero-tolerance policy** against all forms of bribery, corruption, or unethical inducement. Employees, including those deployed at client sites, must uphold the highest standards of honesty and impartiality in every business interaction.

Bribery — whether direct or indirect, in the form of cash, gifts, favors, or anything of value — is not only a serious violation of company policy but also a potential criminal offense under the **Malaysian Anti-Corruption Commission Act (MACC Act)**.

**Employees must not:**

- **Offer, promise, or give bribes**, commissions, personal benefits, or any form of "under-the-table" arrangement to any person or entity for business advantage.
- **Solicit or accept any personal gain**, including cash, gift cards, entertainment, or favors, from suppliers, clients, or third parties in exchange for preferential treatment or confidential information.
- **Engage in any activity** that may create a perception of favoritism, undue influence, or conflict of interest.

**All gifts, hospitality, or benefits — regardless of intent or value — must:**

- Be **declared in writing to HR** immediately.
- Receive **written approval from HR** and, where applicable, the designated client.
- Be recorded for transparency, audit, and compliance purposes.



**If you are unsure:**

- Always **seek guidance from Matchlink HR** before accepting or giving anything of value in the course of your duties.
- If a situation arises where a gift cannot be declined (e.g., cultural norms), report it promptly and surrender it to HR for appropriate handling.

**Consequences of non-compliance:**

- Any employee found engaging in **bribery, corruption, or concealment of such acts** will be subject to **immediate disciplinary action**, including **termination of employment**.
- Legal prosecution may follow under the MACC Act or other applicable laws, potentially leading to **finances, imprisonment**, or both.

Ethical conduct is not just a policy — it's a reflection of Matchlink's integrity. Any action, even unintentional, that could be seen as corrupt must be avoided.

## Compliance with Law & Policies

You are required to:

- Abide by the **Malaysian Employment Act**, client regulations, safety laws, and any site-specific instructions.
- Submit documents or reports when requested by auditors, HR, or legal authorities.
- Follow COVID-19 SOPs or other health & safety protocols if applicable.

Ignorance of the law or policy is **not an excuse** for non-compliance.

# Social Media & Public Statements

Employees are strictly prohibited from misusing social media or any public communication platform in a way that could harm the reputation, confidentiality, or operations of **Matchlink Sdn Bhd** or its designated clients. As representatives of the company — even when off-duty — your actions online can carry serious professional consequences.

## Employees must:

- **Never post photos, videos, work-related updates, or comments** about their job, workplace, client premises, or Matchlink **without prior written consent** from management or HR.
- **Avoid tagging Matchlink, clients, or client locations** in personal social media posts unless explicitly authorized.
- **Refrain from sharing confidential or sensitive information**, including:
  - Screenshots of internal systems, chats, emails, or documents
  - Project details, HR matters, or client data
  - Any images or content that reveal internal operations or locations
- **Do not comment publicly** on any business-related issue that involves Matchlink or clients, especially during disputes, investigations, or legal proceedings.
- **Avoid posting content that may be perceived as offensive, discriminatory, or inflammatory**, even in personal accounts — as this may reflect poorly on your role and employer.
- **Do not use Matchlink's or the client's logo, name, or branding** on personal platforms without written permission.
- **Use official HR channels** such as direct reporting lines, HR email, or whistleblowing mechanisms to express concerns or complaints — **never post grievances on social media, blogs, or online forums**.

## Consequences:

- Violations of this policy may be considered **serious misconduct** under company disciplinary procedures.
- Matchlink reserves the right to **conduct investigations**, request takedowns, or take **disciplinary action**, including suspension or termination.
- Legal action may be taken for breaches of confidentiality, defamation, or reputational harm.

As a general rule: **"If in doubt, don't post."** Always treat online activity as public and permanent, even on private accounts.

# Workplace Substance Use

Employees must:

- Not possess, consume, or distribute alcohol, illegal substances, or non-prescribed drugs at work.
- Not report to work under the influence of any such substance.
- Avoid using or possessing vape, cigarettes, or alcohol where prohibited by the client.

Violations may result in **immediate termination** and legal escalation.

## Dress Code & Professional Appearance

Matchlink expects all employees to:

- Follow client dress codes, including uniforms, PPE, or professional attire as applicable.
- Avoid revealing, offensive, or extremely casual outfits (e.g., shorts, slippers) unless approved.
- Maintain personal cleanliness and hygiene.

Repeated violations may result in denial of worksite access.

## Attendance, Punctuality & Reliability

Employees must:

- Follow designated client working hours.
- Observe all attendance policies — including clock-in/clock-out or biometric systems.
- Notify supervisors/HR of any lateness or absence immediately.
- Be present on-site unless on approved leave or emergency basis.

Repeated offenses may be reported by the client and treated as **insubordination**.

# Compliance & Enforcement

Maintaining professional conduct is essential to the reputation and operational integrity of **Matchlink Sdn Bhd** and its designated clients. Any violation of this Code, employment terms, client policies, or Malaysian labor laws may result in disciplinary action.

**Matchlink reserves the right to take the following disciplinary measures, depending on the severity of the misconduct:**

- **Verbal Warning:** For minor infractions, a verbal reminder will be issued and documented. Repeated minor misconduct may escalate to formal written warnings.
- **Written Warning:** A formal written notice will be issued for more serious or repeated misconduct. This will be recorded in the employee's file and may affect future employment considerations.
- **Suspension (With or Without Pay):** The employee may be suspended temporarily, pending investigation or as a consequence of misconduct. Suspension terms will be communicated in writing.
- **Demotion or Reassignment:** In cases where the employee's behavior affects their suitability for a role, Matchlink may reassign or downgrade the employee to a different position, location, or project, subject to operational needs.
- **Termination of Employment:** For gross misconduct, repeated violations, or breaches of trust, immediate dismissal may be enforced without notice.
- **Referral to Legal or Regulatory Bodies:** Where laws have been broken (e.g. fraud, harassment, data breaches, bribery), Matchlink may refer the case to relevant authorities or regulatory agencies.

## **Important Notes:**

- **Client-Initiated Reports Are Binding:** If a client raises a concern, coaching note, warning, or disciplinary notice to Matchlink regarding a deployed employee, it will be **treated as a formal report**. Matchlink will act on these reports with the same seriousness as if the incident had occurred directly under Matchlink's management.
- **Matchlink does not require duplication of warnings** issued by the client. Any client-issued verbal or written warnings — if documented via email or official communication — shall be considered valid and enforceable by Matchlink.
- **Investigation and Due Process:** All reported violations will undergo a fair investigation process. Employees will be given an opportunity to respond to allegations before any final decision is made.
- **Zero Tolerance for Retaliation:** Employees are protected from retaliation when reporting misconduct. However, false or malicious reports will themselves be considered misconduct.

This policy ensures transparency, fairness, and alignment with Malaysian labor law, while also respecting the authority of our designated clients who oversee deployed employees day-to-day.

# Whistleblow

Matchlink Sdn Bhd encourages all employees, especially those deployed at client sites, to report any misconduct, unethical behavior, or violations of law or company policies. However, as many employees operate under the supervision of our designated clients, all whistleblowing must be handled through the appropriate and ethical channels **established by the client organization**.

## What Can Be Reported

You are encouraged to report serious matters such as:

- Harassment, bullying, or abuse at the workplace
- Discrimination or unfair treatment
- Fraud, bribery, or corruption
- Breach of client-specific or legal policies
- Data breaches or confidentiality violations
- Unsafe work conditions or unethical conduct

This list is not exhaustive.

## Proper Reporting Procedure

- All complaints or reports **must be submitted through the designated client's official reporting or whistleblowing channels** (e.g., email, hotline, HR portal).
- Employees must also **notify Matchlink HR once a report has been filed** so that we are aware and can monitor the process if required.
- Reports must be made **professionally and in good faith**, without slander, exaggeration, or malicious intent.
- **Do not use social media, public platforms, or informal discussions** to raise concerns — doing so may be considered a breach of confidentiality and company policy.

## Confidentiality & Ethics

- Whistleblowing must be done ethically and confidentially.
- If the issue involves a sensitive matter (e.g., retaliation, illegal activity), you may request anonymity through the client's whistleblower program.
- Matchlink will cooperate with the client's investigation but cannot override their internal protocols.

## Protection Against Retaliation

- You are protected under the law and client policies from retaliation or victimization for whistleblowing in good faith.
- Matchlink will advocate on your behalf if retaliation is suspected, but **employees must cooperate fully with the client's investigation process**.

## Important Notes

- Matchlink does not have enforcement authority at the client's site but can assist in facilitating a fair process.
- Frivolous, false, or unethical accusations made with intent to harm others may result in disciplinary action.
- Use discretion, avoid gossip, and never post internal matters online.

Whistleblowing is a serious and protected act — but it must be done through the right channels, with integrity and professionalism.

# Acknowledgement & Awareness

All employees must:

- Sign a formal **Acknowledgement Form** confirming receipt and understanding of this Code
- Understand that this Code may be updated periodically, and compliance is mandatory
- Recognize that this Code **does not replace** the designated client's own Code of Conduct or employee manual

Employees are responsible for obtaining and complying with the client's handbook or SOPs on their **first day** of deployment.