

B E S H O M

Human Resource Online System

职员手册（2025年二月更新）

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简介

此职员手册包含全体海鸥集团职员所须遵守之雇用条例、规章和程序。职员必须遵守手册里所规定之条例、规章和程序，塑造一个健康和谐，有纪律及有效率的工作环境。

1. 此职员手册之雇用条例、规章和程序将取代之前所发布的。
2. 公司可按情况作出必要的调整及更改雇用条例、规章和程序。有关更改将通过有关管道传达给职员，例如：布告栏、电子邮件、公司网络和更新手册等。
3. 此手册是公司财产及有关主管部门必须保管好以便让员工可随时取阅。
4. 若职员对此手册有不明之处可向人力资源部询问。

集团结构

海鸥控股有限公司

批发部	<ul style="list-style-type: none">□ 海鸥企业有限公司□ 海鸥药业有限公司□ 凯源有限公司□ Grand Brands (M) Sdn Bhd□ 益成茶行有限公司□ Yan Ou Holdings (M) Sdn Bhd
零售部	<ul style="list-style-type: none">□ 海鸥中心有限公司□ 北京同仁堂（马）有限公司
直销部	<ul style="list-style-type: none">□ 海鸥直销有限公司□ PT Hai-O Indonesia
制药生产及实验部	<ul style="list-style-type: none">□ SG Global Biotech Sdn Bhd□ QIS Research Laboratory Sdn Bhd

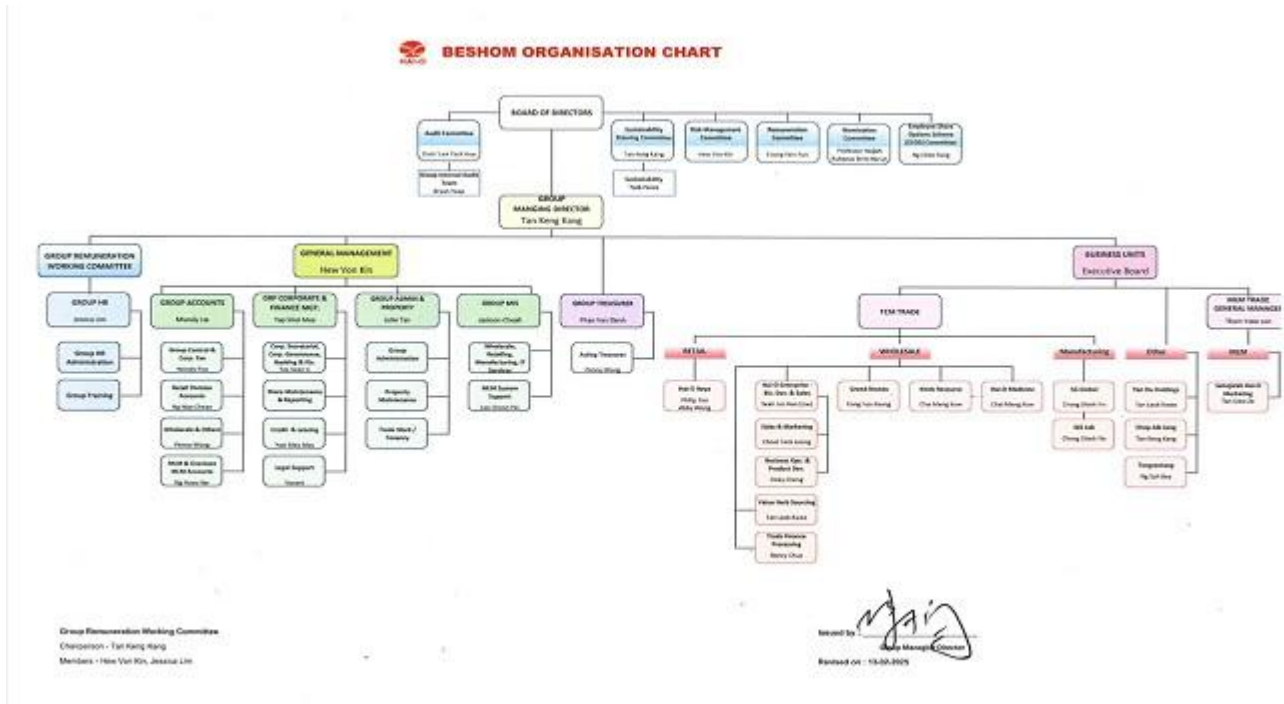
其他

- 海鸥信贷有限公司
- Sri Pangkor Credit & Leasing Sdn Bhd
- Hai-O Properties Sdn Bhd

- 子公司
- 合资公司

海鸥基金

组织图



放大

人才观

海鸥重视“人才”，因为我们坚信人力资本是企业主要的资产和财富。我们的三大人力资源核心价值是：归宿感、团队精神与平等待遇。我们鼓励员工力求卓越，脱颖而出，并灌输他们将BESHOM的职业生涯视为自身事业的理想。我们贯彻团队友爱精神，群策群力把每份工作做到最好。每个员工拥有同等的机会和空间，各自发挥所长，为公司做出贡献，并享受应得的奖励与表扬。在“以人为本”的理念下，公司承诺不断培育与提升员工，共同为企业创造价值，达至双赢。

配合公司的人力资源理念，我们的薪酬配套与福利符合了最低工资法律法规，并会依时做出适当的调整，以满足员工的需求。另外，公司也设立以下的奖掖鼓励员工

- 最佳员工奖、最佳营业员奖、最佳公司奖和长期服务奖
- 公司提供各种内外培训帮助提升员工素质

- 除了有表现花红外，公司也设有丰厚额外奖励金给员工达成业绩指标的员
- 实现公司关键指标(KPI)的额外奖励；本地或海外旅游奖励；公司提供员工认购股票计划，让员工增加归属感
- 公司以特别优惠的利息，提供各项贷款给员工以解财务负担
- 公司提供集体意外保险，住院医疗保险，医疗和牙科福利
- 公司设有亲善会，组织各项团康活动如家庭日，旅游等，以加强员工，家庭和社区之间的关系。

我们致力于秉持及维护劳工道德标准，包括避免和防止所有形式的童工、强迫劳工和贩卖劳工以及过长的工作时间。我们不会因种族、宗教、性别、年龄、残疾和国籍而歧视任何人。员工也不受限制参与任何社团的自由及任何集体谈判。

座右铭

品牌故事

我们坚信千里之行，始于足下，“**最佳生活 · 始于家元**”。BESHOM 秉持着海鸥自 1975 年创立以来的优秀传统文化和理念，继续昂首翱翔，这是我们为提升人民健康福祉，开启美好生活质量的使命。何为人民健康福祉？

以人为本

我们为每个人提供便捷可信的健康保健产品，这个承诺永不改变。

安居乐业

我们精心设计一应俱全的平台，为您提供支援，替您创造机会，让每一个人享受安居乐业的成果。

高瞻远瞩

通过崭新的医疗保健科技，改善人类健康，勇于创新，未来可期。

继往开来

建立一个融合信任，价值、诚信和永续发展概念的企业，继往开来，承先启后、延续美好。

理念与使命

理念

我们致力成为马来西亚最卓越的保健企业，为顾客、商业夥伴、员工及股东带来最高的价值与荣耀。

使命

弘扬保健文化，创造幸福生活。

企业文化



1. 雇用条规及规章

1.1 职前医药检查

若有需要公司可要求新加入职员在公司指定诊疗所进行医药检查，以确定健康状况。

1.2 试用期

新进职员须经过以下试用期，并以雇用日期开始计算：

职等	试用期限
1-11	六 (6) 个月
12-15	三 (3) 个月

考核未合格者，公司可保留权利延长试用期3个月。在试用期间双方职员与公司欲结束雇用关系，须要给予书面通知或以通知期限的同等薪金赔偿代之。考核合格者，公司将发出正式录用信通知。

1.3 正式录用通知

工作表现卓越者可提前或在试用期到期，公司将发出正式录用信通知被录取。考核未合格者，公司有权利不录用有关职员。

1.4 职员识别证（只适用于海鸥中心门市职员）

公司将发出职员识别证给新职员，在工作地点必须戴上此识别证。识别证遗失或损坏必须马上向海鸥中心人力资源部申请补发，另征收RM10.00 的补发费。

1.5 穿著准则

1.5.1 衣著

职员在工作时间里的穿著必须整齐端庄。在办公室里或周日不可穿牛仔裤，T恤及拖鞋。

女职员不可在办公室里穿裤裙、短裤、热裤或暴露服装。以下是穿著准则：

男职员—衬衫、领带和 / 或套装

女职员—上衣、裙和 / 或套装或正式套装

1.5.2 鞋子津贴

正式录用的货仓员工每年可享有一双防护鞋。

1.5.3 制服

下图是制服提供及穿著说明，公司将向职员征收抵押金。职员必须时时刻刻保持制服整洁。职员离职必须归还制服，公司将退还抵押金。若离职没有归还制服，押金将被没收当作制服赔偿金。

职别（正式录用）	制服提供	穿著说明
经理级职员	1 套量身订做的套装 及1 件海鸥T-恤	在指定活动必须穿上
货仓及生产部职员	3 件海鸥T- 恤	在工作日必须穿上

办公室职员	1 件海鸥T- 恤	在指定活动必须穿上
门市职员	3 件海鸥连锁店T-恤	在工作日必须搭配黑色或深色长裤

所有门市职员若要改造制服，必须事先获得公司批准，改造费用由该职员承担。

1.6 薪金

职员必须在以下银行开户口以方便薪金可以直接汇入他的户口。公司发出之薪金必须先扣除法定缴交项目，如公积金、社险、就业保险、所得税及其他法令规定。

办公室职员	OCBC Bank (Malaysia) Berhad
其他	Public Bank Berhad

1.7 工作表现评估

工作表现评估 / 评估面谈将在以下情况进行：

- 正式录用职员
- 晋升评估
- 年度绩效评估

以下是各组别的评估表格及考核内容：

表格	被评估者(组别)	工作考核	培训要求	同事考核	客户考核	业绩考核	主要任务	门市考核表
A	子公司 / 营业经理	10%				90%		
	经理级	10%					90%	
C	执行员 (职等7-9)	35%	5%				60%	
D	非执行员 (会计部) (职等12-15)	40%					60%	
	主任 (职等10 及11)	40%					60%	
	货仓职员	40%					60%	
E	营业员	40%				60%		
F1	门市负责人 (店长//副店长/代店长)	10%	10%			60%	20%	
F2	草药头手	10%	10%			60%	20%	
F3	储备干部 (见习员/二线: 副店长)	30%	10%			30%	30%	
G	草药助理, 零售助理	70%	10%			20%		
H	非执行员(业务兼客户服务部)	20%			20%		60%	

I	被提升为执行人员或经理	100%						
J	直销分行职员	40%					60%	

1.8 调动

调动职员是公司的特权，不应有争论异议。每位职员都可被调动部门，公司，或因公司业务上需要而被调动去某地区。

调动前，有关职员必须进行正式工作交接程序。

1.9 培训

培育人才是公司“以人为本”的方针。公司针对员工工作及职途发展的需要提供培训给职员，以提升工作素质及态度。鉴此，如职员被选或被派往培训都必须掌握学习机会。

培训部或被委任职员将会在新进职员开始工作后安排迎新交流，以帮助新职员更快适应新环境及加强团结与归宿感。

公司将在适当时安排内部培训给职员。若工作上需要，职员可能会被安排派外受训。公司可决定是否在派外受训後，有关职员须为公司服务一段时间。

若受训後服务合约期限不足，离职时需全数退还有关课程费用给公司。

职员可向培训部查询有关培训条规及程序。

职员必须在每个财务年度按照以下列表等级和时数完成培训时数：

等级	时数
经理	16 小时
执行人员	8 小时
销售人员	8 小时

1.10 离职终止雇用

凡职员欲请辞或公司欲终止雇用该职员都须提前给以下所需书面通知期限：

职等	试用期限	录用后
1-7 (经理)	7 天至14天	2个月
7-11	7 天至14天	1个月至2个月
12-15	24小时至14天	1个月至2个月

注：离职通知将根据其职位或工作需求而改变。

若无书面通知则须赔偿预告不足的薪资。任何触犯或违反雇用条规被解雇者不须给於通知。

1.11 离职面谈

员工因故不能继续服务，自动辞职者得依员工离职申请规定处理。门市职员须填写离职申请表呈交有关部门主管核准後，按照移交办法规定办妥一切的离职移交手续。

员工离职必须参与离职面谈④填妥离职调查卷，目的是让公司了解离职原因。

1.12 离职移交手续

辞职员工尚在职期间必须归还所有公司资产④填妥归还公司资产单。

有关辞职者上司将负责确保办妥离职移交手续，若职员没办妥，公司将从职员尚剩薪金里扣除有关费用。

1.13 离职尚剩之年假

职员给於离职通知後，任何尚剩有薪年假须提出申请及批准方才可替代有关通知期限。

公司鼓励离职职员在通知期限里清完有关年假，除了特别情况需要有关职员服务，公司将付尚剩年假之有薪年假。

1.14 退休

职员在达60岁就自动退休。

若工作上需要并双方同意下，公司将以期限合约方式雇用。若有需要，公司也可要求退休职员在指定的医疗所进行健康检查，以确定健康状况。

1.15 资遗办法

本公司所属单位员工凡有下列情况之一者，得经由预告终止雇用关系，并办理资遗，

- 歇业或使转让时
- 亏损时
- 业务性质变更，有减少员工人数的必要时

资遗费将按1980年劳工法令里（终止和解雇福利）处理。

1.16 重新加入

公司将考虑重新聘请自愿请辞或纪律和表现佳的离职职员的工作申请。

- 重新加入
 - 离职期3个月内，允许继续相关的服务期和福利。
 - 离职期3个月以上，将视为新职员。

工作时间表

2.1 工作时间

公司正常工作及休息时间如下：

地点	星期一至星期五	星期六	休息时间
巴生办公室	9.00am - 6.00pm	OFF	1.00pm - 2.00pm
货仓	8.30am - 5.30pm	8.30am - 1.30pm	12.00pm - 1.00pm
幼料部	8.30am - 5.30pm	8.30am - 1.30pm	12.00pm - 1.00pm
生产部	8.30am - 5.30pm	8.30am - 1.30pm	12.00pm - 1.00pm
吉隆坡办公室	9.00am - 6.00pm	OFF	1.00pm - 2.00pm

管理层保留权利按工作特性或工作需要而修定以上工作及休息时间。

零售店

门市每周上班时间是45小时（不含用膳时间），上下班时间视各门市商圈特性与排班情形而定。门市职员周休日须介於星期一至星期五之间。原则上星期六与星期日门市职员不得休假。

2.2 公共假期

每位办公室，货仓及生产部职员享有公司所订之16天公共假期。一旦公共假期落在休息日（星期天），下一个工作日将是替代休假日。

门市职员享有13天有薪公共假期。由於服务业之故，所有公共假期门市都安排职员上班。公司仅对所订13天假期付以有薪假期，其余者均不被列为公司承认之有薪假期。

2.3 超时/特别任务

在正常工作日，休假日或所订公共假期加班，则视为超时。

工作上的需要，公司可安排职员在工作日，休假或公假加班。无合理解释者，职员不可拒绝做超时。

职员在工作上需要超时则必须事先向有关部门经理或主管申请核准後方可加班。

超时津贴申请者资格如下（计算方法按1955年劳工法令第60A）：

- a. 月薪RM4,000或以下的职员
- b. 月薪RM4,000或以下的生产部及货仓主管，执行员和经理
- c. 月薪RM4,000或以下的生产部劳动员及货仓的劳动员工

月薪超过RM4,000之非执行员及执行人员和月薪超过RM4,000的生产部及货仓主管，执行员及经理若有需要加班，公司将提供以下特别津贴或以假期代替：

工作日 / 休日 / 公假	津贴
加班最少1小时	RM12/=
1 小时过后加班的每半小时	RM 6/=
加班10小时或以上	RM 120/=

加班费申请以直属上司批准为依据。

营业员、执行人员（职等7）及经理级职员不可享有加班补贴。假期代替可视情况，由上司批准。

培训视为提升职员职业发展，故在工作日过后或休息日或公假被安排上课则不享有加班补贴及假期替代。

3. 出勤

3.1 出勤记录

所有职员必须在上、下班或进、出海鸥大厦打卡纪录。

代同事打工作卡或让同事打工作卡则视为触犯条规及将被受纪律处分。

一个月迟到三天或以上的职员，名字将会记录在迟到的名单。

每累积迟到二个月的职员，将会收到一封警告通知。

收到三封警告信之职员，公司将冻结其奖励金及年终花红，且年度加薪也会受影响。

若职员还是继续重复以上迟到行为，公司将采取更严格纪律惩罚，包括直接将有关职员开除 / 解雇。

3.2 缺勤

连续2天缺勤，并未申请假期 / 未能提供良好理由 / 未通知或设法通知部门主管缺勤之原因，职员将视已违反雇用条例。

在没申请年假期及合理原因的情况下缺勤一天，公司将发警告信给有关职员。第二次触犯将发收到第二封警告信。再犯第三次，最後警告信。

若职员还是忽视有关警告，继续缺勤第四次，公司可直接开除有关职员。

4. 假期及公假

4.1 年假

职员正式录用後方享有申请年假福利。第一年加入者是以该年服务的月数计算年假比例。

职员享有年假天数依年资的长短分类：

年资		当年享有年假天数	
超过或同于	少于	办公室 / 货仓	零售店
1	2	14 天	10 天
2	5	18 天	14 天
5	-	22 天	18 天

备注

职员可以把尚剩年假累积至下个年度，最高累积年假为 5 天。

所累积年假必须最迟於下个年度4月30日清完。若无，余剩的累积年假将於4月30日之後自动取消。

当年新进职员可允许把尚剩年假累积到下一年。

职员不可在当年申请下一年之年假。

除紧急事件，职员请假须於 3 天前提出申请。

职员因临时有紧急事故没能上班，必须在当天通知部门经理或主任。隔天上班时需补申请年假，如年假已申请完则申请无薪假④证实有关紧急假。

公司可按情况批准或不批准有关假期申请。

若工作上需要，公司可要求有关职员回来上班或取消有关假期申请。

4.2 无薪假

若职员用完享有之年假或没有年假者可申请无薪假，惟须三天前在年假网上系统申请或填写年假表格。

4.3 病假

以下情况职员可享有如下图所示病假。

公司指定医生证实有关职员生病或受伤，不能工作。

根据1971年牙科法令，牙医证实有关职员不能工作。公

司将按以下情况批准非公司指定医生发出的病假单：

- 紧急情况
- 指定医生是否有营业？例如星期日或公假，或指定医疗所休业。
- 距离及合理往返时间

年资		当年享有病假天数
超过或同于	少于	
1	2	14 天
2	5	18 天
5	-	22 天

当医生或牙医给於职员病假，有关职员必须马上通知部门经理或主管，并在48小时内呈

上病假证明。若职员未通知或超过48小时仍未呈上病假证明，则当旷职论。

若职员经常拿病假，公司可要求有关职员进行体检，以确定健康状况。如被证实身体健康有问题，公司可终止雇用合约。身体健康正常，公司将给予辅导。若无改善，将对有关职员采取纪律处分。

职员在上班时间看诊而医生无给予病假者必须回来工作岗位，否则当旷职论。职员同时也须呈上“看病时间单”给部门经理。

4.4 住院病假

以下情况职员享有住院病假：

- 职员有住院
- 医生证实职员生病或其他原因需要住院

凡有职员住院可享有有薪病假60天（包括休日，公假及已申请的病假在内）。

4.5 长期病假

若职员不幸患上癌症、血癌、肿瘤或其他类似疾病，公司可保留再延长无薪病假长达3个月（若住院病假已拿完了）。

延长病假将视公司医生之专业意见，职员痊愈之机率。此延长病假在公司服务期间只限一次。若长期病假申请完后未能来上班，有关职员的雇用合约将自动取消。

若职员在服务期间发生意外或患上疾病，公司没有义务提供另外工作代之。这将视当时是否有合适空缺及公司医生证实身体状况可以继续工作。有关薪金及相关雇用条例将以所提供职位及职等为根据。

4.6 产假

女职员工作最少90天将享有连续98天包括休假及公假在内之有薪产假。此有薪产假不得早于生产前30天开始或不得迟过生产后的第二天开始。

女职员只可享有五个生存孩子之有薪产假，第六个孩子以上将不享有此福利。

有薪产假申请必须在预产日前30天向雇主提出并附上医生证明。若没通知，公司将延迟并在得到有关通知后才会发出产假津贴。

自然或人工流产不视为产假，以病假论。

在公司的同意及医生允许下，不享有产假津贴者可在产假期间提前回公司上班。

4.7 公共假期

以下是公司所订之有薪公共假期：

办公室、货仓、生产部	16天 / 年
零售店	13天 / 年
全职销售员	11天 / 年
兼职销售员	7天 / 年

公共假期列表将于每年年头前贴在公司布告栏和更新在人力资源网上系统。除此之外，公司也会跟随任何中央政府宣布的额外假期。若公司认为该日期不合适放假，将以其他日期代替或增加一天年假给职员。

有薪公假如巧遇周假日， 则於隔日自动补假。

职员在公假前或後缺勤， 并未得到公司同意或未能提供良好理由将不享有有关的有薪公假。

4.8 支付有薪年假政策

公司没有支付有薪年假（**Paid Leave**）的政策，如： 年假或补假。管理层将不受理任何有关延长年假或补假有效期限的要求申请。

4.9 年假转移 -职员辞职

离职员工不能使用转移年假提早离开公司：

在一月至四月提呈辞职	当提呈辞职信的那天开始， 将不享有剩余的转移年假。
在五月至十二月提呈辞职	经理/管理层有权决定是否允许员工提前离开公司。

5. 员工福利

5.1 公积金

公司将按照公积金局所提供之缴交额表为职员及公司缴交法令指定的基金。

5.2 社险（SOCSO）

雇主和雇员均须缴交社险。社险缴交率是以雇员每月的收入来按照社险据所规定的缴交率扣除。社险缴交率最高数额是以月入RM 6000/=为最高限额。

5.3 就业保险（EIS）

所有年龄介于18岁至60岁的雇员需缴交就业保险（EIS）。雇主与雇员均须缴交。 保费的缴交率是按照社险局所规定的缴交率为准。

5.4 保险计划

5.4.1 集体个人意外保险计划（GPA）

公司会为全职职员投保"GPA"，除了合约性质的全职促销员。 利益是因意外造成死亡或永久性伤残将获得赔偿。此保障为全天24小时。投保类别及数额以职等为准：

职等	数额 (RM)
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1	500,000
2 - 3	300,000
4 - 5	250,000
6 - 7 (经理)	180,000
7 - 9	150,000
10	120,000
11 - 12	80,000 或 120,000*
13 - 15	50,000 , 80,000 或 120,000*

(*职员时常出坡者将投保最高数额)

公司的义务只是为职员缴交保费。若职员发生意外受伤，公司将协助有关职员或职员的合法代表向保险公司申报。有关利益以公司为职员所投保之数额为准。

若职员发生意外，公司预先缴付有关医药费、丧礼费和遣送回国费，公司有权从保险赔偿金里扣除以上费用。

5.4.2 集体住院及手术保险计划 (GHS)

公司会为正式录用职员投保“GHS”，利益是入院及 / 或需要手术治疗将可获得索赔。

住院及手术保险有附属医药卡。公司将分发医药卡给所有正式录用的职员。

若职员遗失医药卡，必须立即通知人力资源部，并支付 RM10/= 的行政费用。

离职/退休或在任何情况下离开公司的职员，必须归还医药卡给人力资源部。

以下是投保类别：

职等	投保类别 (食宿)
1 - 3	A1 (RM350)
4 - 6	B1 (RM250)
7 (经理)	C1 (RM220)
7 - 9	D1 (RM200)
10 - 11	E1 (RM150)
12 - 15	F1 (RM100)

公司也开放此GHS给职员投保家属利益。若职员想家属被列入GHS，这是职员的责任，必须提供相关家属资料给公司及通知公司若有任何变动。职员也必须自费承担为他们家属覆盖范围的全部保费。

5.5 医药福利

5.5.1 公司医生

公司指定医疗所将提供职员免费医药福利。可在附件里参考指定医疗所名单。职员必须预先向部门经理或人事单位索取公司提供的医生纸方可享有免费治疗。

若没有公司提供的医生纸，职员必须自付医药费。有关申报则全权由公司决定。

5.5.2 非公司医生

在非公司医生诊所看诊，医药费索偿将全权由公司决定及按以下情况处理：

- 紧急事故
- 公司医生是否有营业？例如星期日或公假，或指定医疗所休业。
- 距离及合理往返时间

非公司医生医药费索偿也包括以下事项：

- 中医师（仅限在海鸥连锁店和北京同仁堂驻诊的医师）
- 普通牙诊（只限一年四（4）次）
- 健康检验（只限一年一（1）次和须呈交健康报告）

公司将按照收据补还非公司医生的医药费，索偿最高数额以职员的职等为准。每月公司最多承担两（2）次的费用和只限于一天一张医药收据。所有医药费索偿必须附上正本收据。

职等	每笔最高数额
1 - 3	RM140/=(包括直属家人*)
4 - 5#	RM140/=
6 - 8	RM120/=
9 - 15	RM100/=

#直系亲属的医药索偿只限于总经理，副总经理和公司的负责人

*直系亲属是指配偶和年龄不超过18岁的孩子。

5.5.3 医药治疗

医药福利只限时病如流行性感冒、咳嗽、发烧、喉咙痛、普通牙诊（只限一年四次）及其它。公司不负责以下所列之费用：

- 吸毒、因毒品引起的病症、酒精及其他物质引起之治疗费
- 性交感染之疾病、爱滋病或其他相关疾病
- 怀孕、生产或流产引起之费用
- 手术、牙医费用（牙齿矫正或相关美容用途）
- 美容、整容及整形手术
- 割包皮手术
- 精神病例
- 自残、打架、犯罪、行为不检、参与危险运动 / 活动、不节制或不健康生活引起受

伤。

- 任何在还未加入公司已存在的病症或疾病

5.5.4 医药检查

经理级职员（职等1 – 7）医药检查，每隔一年一次。

所有的费用申报必须提交于人事部并附上正本收据和医疗报告。公司将依收据补还的数额限制如下：

职等1-5	职等6-7
每次医疗检查以RM500/= 为准	每次医疗检查以RM400/= 为准

5.6 住院关怀礼

为了表示对正式录用住院员工的关怀，公司将给於住院员工以下关怀礼品, 分娩和流产及相关因素除外。

- 花篮/水果篮价钱不超过 RM150/=
- 公司产品价值不超过 RM120/=

5.6.1 产后调理礼品

为了感谢女性员工在公司的付出和迎接新生命的到来，公司将送出价值不超过RM100/=的产后调理礼品给生产后的正式录用女性职员。

5.7 丧假

直属家人逝世（父母、配偶父母、配偶、子女、兄弟姐妹、祖父母、外祖父母），正式录用职员享有连续3天工作日的有薪丧假来处理有关事项。

申请者必须附上证件及必须於当天通知部门经理或直属上司。

若职员的家属逝世	殡丧援助金(RM)
配偶，子女及父母	RM200
配偶父母，兄弟姐妹，祖父母，外祖父母	RM100
员工在公司服务少于一年	RM1000
员工在公司服务一年或一年以上	RM1000 + 2 个月工资

5.8 殡丧援助金

若职员或职员的家属逝世，公司将依据以上列表给於帛金。

试用期之职员不享有殡丧援助金，惟可享有1天的有薪丧假。必须附上复印死亡证明。

5.9 特别有薪假

公司将依据以下情况给於正式录用职员特别有薪假期：

- 婚假（第一次合法婚姻） — 连续3天工作日假期
- 喜假（男性职员孩子出世）
 - 符合条件的男性职员将享有连续 7 天的有薪喜假, 无论配偶人数多少, 不超过 5 次分娩。
 - 相关职员必须在配偶生产前至少 30 天或生产后立刻通知雇主(公司)。
 - 职员须呈交孩子的报生纸给人力资源部为证明以申请该假期

5.10 结婚红包

公司将给於正式录用职员第一次合法婚姻RM500红包以示心意。试用期之职员则无结婚红包，但是公司将给於1天婚假。

必须附上证件以享有以上福利。

5.11 学习/考试假

职员被公司派外受训或继续深造将享有学习假及考试假。私自参加者可申请无薪学习假期。所有申请都必须附上资料证明，惟可否获批准则全权由管理层决定。

5.12 长期服务奖

为了表扬职员之长期服务，公司提供以下奖项：

10 年服务奖—现金 RM1,500 及奖杯一个

20 年服务奖—现金 RM3,000 及奖杯一个

25 年服务奖—现金 RM4,000 及奖杯一个

30 年服务奖—现金 RM6,000 及奖杯一个

35 年服务奖—现金 RM8,000 及奖杯一个

40 年服务奖—现金 RM10,000, 奖杯一个及手表一个或价值RM2000/=的海鸥现金礼券或智能产品

45 年服务奖—现金 RM12,000 及奖杯一个

50 年服务奖—现金RM13,000, 奖杯一个及价值RM2,000的海鸥现金礼券或智能产品

5.13 贷款计划

正式录用职员可向海鸥信贷有限公司及 Sri Pangkor & Credit & Leasing Sdn Bhd 申请贷款（购入资产贷款 / 个人贷款），并享有特惠利息。

贷款条件及详情可向有关公司了解。

5.14 汽油卡、交通及电话补贴

汽油卡发放及补贴金额 / 交通补贴 / 电话补贴全权由公司决定及按职员工作需要为依据。任何申报都必须附上正本单据。

5.15 交通补贴

使用私人交通工具或乘坐公共交通出差的职员可申请交通补贴，惟须预先得到部门经理核准。

拥有汽油卡/交通津贴的员工（除了营业员）不享有交通补贴。

下表是交通补贴及来回里程：

交通类别/来回里程	补贴率
汽车	RM0.60/公里
摩托车	RM0.35/公里
公共交通	根据实际单据或部门经理核准款额或视何项为低
海鸥大厦与Wawasan Hai-O	6 公里
海鸥大厦与Menara Hai-O	75 公里

职员也可在“每个月头”呈交上个月的收据申报泊车费及过路费。逾期呈交的补贴将会被拒绝。

5.16 过路费索偿

要申请过路费索偿的职员须通过网上注册过路费卡 (Touch n Go) 账户，并打印有关的过路收费记录以作证明。

5.17 住宿房价及外坡津贴

因公出差到外坡的职员可申请住宿津贴。

住宿申报以实际消费单据为准或以以下建议房价。若房价超出了建议范围，须给予合理理由并得到上司核准。

职员类别（营业员除外）	住宿房价（双人房）
经理级	RM150-RM200
执行人员	RM100-RM150
非执行人员	RM80-RM120

总经理，副总经理和1-3职等的员工享有本地和海外出差的单人房住宿福利。

外坡津贴是根据下表类别来支付，惟不適用於职员职等1、2及3。

职员类别	津贴
销售人员	RM110/晚
货仓员工 (只限工作日)	RM 63 每趟及不享有超时津贴
- 办公室员工	早餐RM17/=
- 货仓员工	午餐RM23/=

(只限星期六非工作日，星期日及公共假期)

晚餐RM23/=

注：此津贴不适用于职等1, 2 及3 的职员

备注：

营业员享有外坡津贴必须符合以下条规：

- a. 里程从营业员地址必须超过70公里。
- b. 必须附上销售/收账报告方可申报。
- c. 驻在外坡的营业员来总部开会或培训则不算在内。
- d. 公司保留绝对权利拒绝没有提供合理理由。

5.17.1 补贴/津贴申报期限

员工必须在每个月的第五天把上个月的申报表呈上。不允许呈交累积超过一个月的申报表。

5.18 出国费用申报

任何职员出国公干必须填写出国公干申请表（BESHOM/GP/FORM12）并先得到董事经理或执行董事的批准。若职员没有附上正式批准的海外出差申请表格，会计部将不处理任何有关海外出差的索偿。

5.18.1 舱位

被派遣出国公干的职员可乘坐经济舱位。公司允许来回机场乘搭德士。

申请于ASEAN（东南亚）国家出差的经理们，必须乘坐廉价的航空班机。若经理们需要乘坐非廉价的航空班机，经理们须提供适当的理由及得到上司的批准。

5.18.2 住宿申报

若职员因公干需要在海外过夜，可申报住宿费用。有关酒店必须得到公司的核准方可住宿。

当超过一位职员因公干需要在海外过夜，基本上是以两人一房之安排。同时公司可保留权利核准职员一人一间房。

5.18.3 膳食及交通

职员（等级2至15）被安排国外公干，如参观海外展览或类似活动，将享有一天RM80/=包含三餐之海外膳食津贴。此膳食津贴包括休息日及公共假期。职员享有此海外膳食津贴不允许另外分开申报膳食补贴，反之亦然。申请膳食补贴必须注明出席午/晚餐的客人/供应商的资料。

如果职员一天只申报一餐，即午餐或晚餐，有关职员只可享有一天RM40/=之海外膳食津贴。

除了食物之外，职员也可申报交通补贴，惟有关的申报必须以单据为准及有上司的核准。

5.18.4 洗熨开支

职员可申报洗衣费，若逗留时间超过5晚。

5.18.5 现金预支

职员因出国公干可享有每旅程不超过RM3,000之现金预支。全部核准申报费用必须先扣除此现金预支及尚剩现金（若有）必须归还给公司。全部申报费用必须在每次旅程回国後的一星期内呈上。

5.18.6 出入境签证（VISA）

若需要出入境签证，有关费用可申报。

5.18.7 休息日及公共假期

职员被分派到展览会工作，若工作日是休息日及公共假期则享有申请超时津贴或补假。若有关分派是参观展览会，就不享有申请超时津贴或补假。

5.19 应酬 / 款待费用

通常款待费用是局限於洽谈生意。此费用申报只适合营业经理，公司负责人或资深业务负责人。任何跟客户或业务无关之款待费用则必须预先得到董事经理、执行董事或财务集团总监的核准。

任何一次款待费用超过RM1,000必须预先得到执行董事或集团财政核准。

生意上之款待费用必须附有单据并注明原因。若有关申报超过合理数目，公司保留权利不核准及有关职员必须自行承担有关费用。

此费用将会显示在各部门的预算。

任何申报必须填写在费用补贴表(BESHOM/GP/FORM 5)。有关费用补贴表格必须预先呈交给有关上司（如上所示）核准有关申报。

5.20 年度加薪

年度加薪全权由公司决定，视公司的整体盈利表现评估，个人表现以及酬薪委员会之批准。

5.21 年度花红

年度花红之发放全权由公司决定，视公司盈利表现及职员本身表现和对公司的贡献。公司发出花红之前已呈辞者，将不享有获得花红权力，即使此员工有服务於花红之计算年度。

5.22 职员奖励制度

符合规定条件的员工也有资格参与公司职员奖励制度。此奖励制度与各别公司业绩表现直接挂钩。公司将每年检讨有关的合格条件如销售目标、盈利等，提呈集团董事经理批准。

奖励是通过现金、礼券或职员股票认购的方式发出，以每财务年度计算。奖励的分配是

依照职等，个人表现与贡献以及公司整体的业绩状况为准。只有正式录用的职员，在检讨财务年内服务至少4个月或以上方可参与此项奖励制度。

职员奖励制度的细节可参阅於2007年12月31日的编订本。

5.23 职员采购

每名职员将享有同等优惠的折扣率购买海鸥商品。公司将不会根据职员等级的区别给予不同的折扣率，而是一律给予平等和标准的折扣率。职员采购必须以现金交易，不可赊账。

同时公司将会免费分发职员海鸥之友卡给正式录用职员，此卡可以在全马海鸥连锁店使用。

5.24 运动及消遣活动

海鸥亲善会由职员成立，并提供一系列运动及消遣活动让职员在工作之余注入活力。此亲善会扮演积极角色促进全体海鸥集团职员之间关系。

会员将缴交象征性的月费给海鸥亲善会。月费率如下：

执行董事	RM25
经理及执行人员	RM8
其他	RM5

公司也会缴交同等月费给海鸥亲善会，即每月1:2之标准。

5.25 最佳员工奖

此奖公开给全体职员参加。由上司或同事推荐并呈上推荐表格。公司将邀请不同部门的经理及职员投票评选。每两年评选三位最佳员工，即每类别一位最佳员工。

最佳员工分为三个类别：

1. 经理级
2. 非经理级
3. 门市（海鸥连锁店及海鸥直销分行）

筛选标准以有突出表现或贡献的员工，或高度发挥企业精神，作为其他同事学习的典范为准。

最佳员工将获得奖杯、RM 3,000/=现金和以下的其中之一(1):

- i. 由公司安排之免费海外旅游
- 选择参与海外旅游的获奖者须以书信通知人力资源部，人力资源部将为员工报名。
- ii. 价格不超过RM 2,500/=电脑或智能设备产品

iii. 价值RM 2,500/=海鸥现金礼卷

5.26 最佳营业员奖

此奖公开给全体营业员。每年只有一位营业员将会被选为最佳营业员。

筛选标准以在业绩评估部分取得最高分数的营业员及在客户服务方面有优异表现为准。

最佳营业员将获得奖杯、RM 3,000/=现金和以下的其中之一(1):

- i. 由公司安排之免费海外旅游
- 选择参与海外旅游的获奖员工须以书信通知人力资源部，人力资源部将为员工报名。
- ii. 价格不超过RM 2,500/=电脑或智能设备产品
- iii. 价值RM 2,500/=海鸥现金礼卷

管理层将保留权力按情况取消、修改或更改以上奖项内容。

6. 公司固定资产

6.1 发放及管制

以下为公司发放给因工作需求的有关职员的固定资产

- a. 公司汽车
- b. 汽油卡
- c. 手提电话
- d. 手提电脑
- e. 工具及设备

收到后必须保管好，直至归还公司。若有关固定资产遗失，损坏或被偷，职员必须立刻通知管理层。若是因疏忽或保管不当所致，职员必须赔偿有关损失。

职员离职时必须归还公司固定资产。

6.2 公司汽车 / 车辆

使用公司车辆职员必须负责照顾，保持车辆清洁以及小心驾驶。

任何交通罚款将由当事人自行负责。

若发生意外，不见或损坏，职员必须立刻通知公司及如有需要，向警察局报案。若是驾驶员之疏忽而导致，将根据以下处理：

第一次

- 记录在案

- 职员必须自行承担交通罚款，若有
- 维修费赔偿则免

第二次

- 记录在案
- 职员必须自行承担交通罚款，若有
- 维修费赔偿不超过RM300

6.3 汽油卡

指定职员将被分发汽油卡并由执行董事批准。此卡只是限给有关职员添汽油而已。添油收据必须收好并呈交给公司。

6.4 手提电话

电话费补贴因个别工作需求，补贴费限额不超过RM80至RM200。所有补贴费须呈上正式单据。

6.5 手提电脑

手提电脑只提供给指定职员，但必须获得执行董事/董事经理批准。

任何手提电脑申请必须填写在指定表格并通过集团电脑部处理。

6.6 工具及设备

若工作上需要，职员可被供应有关工具及设备以执行任务。

工具及设备采购必须根据采购程序。除非得到授权，否则职员不可自行购买工具。

7. 安全及整洁管理

7.1 安全工作坊所

维持工作坊所安全是全体职员及公司的责任。职员可配合并采取以下预防方法：

- a. 严格遵守安全措施
- b. 谨记使用安全设备及仪器
- c. 立刻向公司报告任何不安全及会引起火灾情况
- d. 立刻向部门经理或上司，人事部报告任何公司产业损坏

7.2 吸烟

为了公司及职员安全，严禁在禁止吸烟地点（例如办公室、货仓及洗手间）抽烟。

7.3 火灾

若发生火灾，立刻报告部门负责人，④有秩序疏散在场人员。

7.4 电流故障

若发生电流故障，职员必须继续例行工作直至部门负责人的另行通知。

7.5 整洁

每位职员都必须保持工作环境的整齐与清洁。一个整齐清洁的环境将让人感觉舒适及健康。

8. 戒备

8.1 戒备检查

为了保护公司的财产，采取的措施有：

- a. 保安员被授权检查进出公司的职员及车辆
- b. 若有需要，公司有权向任何职员进行搜身检查

全体职员必须给於公司保安员充份的合作及配合。

若职员犯下以下情况，将不允许进入或将会被指示离开公司：

- a. 携带手枪或任何危险武器或物质
- b. 任何影响他人健康及工作的不卫生穿著/ 仪表
- c. 被停职
- d. 任何损坏公司商誉或触犯条规之可疑行为

8.2 公司货物或财物

任何欲带出公司之公司货物或财物都必须有授权之文件。例如：呈上交货单或报效表格给保安员验证。

8.3 机密

职员严禁参与任何与公司或工作有利益冲突之活动 / 业务。

任何会影响公司， 顾客或任何人与公司有接洽之交易、资料、商业事务，职员都必须保持机密。

未经部门经理许可， 职员不可带走公司机密文件或自行复印有关文件。

职员资料和薪金视为机密。职员不可泄漏给他人知道。

8.4 照相 / 电视录像 / 新闻发布

除非获得董事经理授权，任何照相 / 电视录像 / 新闻发布都不允许。

其他未列出详细守则，请参考及遵守“道德与商业行为准则”。

8.5 电子邮件使用

全体职员必须遵守电脑部规定的电子邮件规则（请参考附件）。

9. 纪律

9.1 纪律处分

全体职员都限制於雇用条例及其他公司条规及规章。触犯或违反者，公司将采取纪律处分。

请参考附件之纪律条规。其他未列在纪律条规的过失，公司有权按其严重性给於处理。

公司可按情况需要，**④** 不时调整及更改此纪律条规。

当有凭证理由时，公司可在调查後采取以下纪律处分：

1. 不需通知，直接开除该职员
2. 降职
3. 无薪暂时被停职不超过2星期
4. 依其情况执行较轻微惩罚，如警告信，延後 / 扣留有关花红或加薪，降薪

纪律处分之类别将依据其严重性给於处理。管理层拥有绝对的权力按各别案例情况给予适当的处分。

当公司需要进行调查 / 安排调查期间，公司可以半薪暂时停职该职员不超过2星期。若证实该职员无罪 / 无触犯任何条规，公司会补发扣留之薪金给职员。

9.2 禁止性骚扰之规章

性骚扰是一种不当的行为，这种行为一方强制和主动/ 受者不会回应。

公司管理层禁止公司范围内发生任何形式的性骚扰，并且致力于确保公司是免於性骚扰的一个工作场所。

公司非常严正看待性骚扰，**④** 认为构成违反公司政策的行为。任何雇员一旦犯下性骚扰，将受行动对付包括开除。

公司的经理和主任级人员具有责任推广和执行相关政策，展示良好的领导力。任何具有性骚扰的行为，是通过口头、非口头、视觉、心理或身体的骚扰。

- a. 这种行为也许出於合理的解释，由受者感悟此乃上司加诸於他 / 她工作的一个性质的条件，（性胁迫通常是一位具有加薪权力和升级的主任，企图胁迫一位下属同意性要求）或
- b. 也许出於合理的解释，受者感悟到这是一种冒犯或屈辱或威胁到他 / 她的幸福，但对他 / 她的工作没有直接连系（性骚扰如一位雇员对一位同僚或公司顾客对一位雇员）。

工作场合的性骚扰是与工作相关的，在工作场合内外发生，包括在下列情况发生：

1. 与工作有关的社交活动

2. 在工作场合外执行任务期间
3. 与工作相关的会议或培训课程
4. 与工作相关的旅行
5. 通过电话
6. 通过电子媒体

性骚扰表现在下述五个可能形式：

- a. 口头的骚扰
例如冒犯性或暗示性的讲话、批评、笑话、戏谑、嘲笑、声音、询问。
- b. 非口头或姿态的骚扰
例如具有过度暗示的媚眼秋波、舐唇、大动作手抓或嚼吃食物、手势或显示性活动的语言，一再的调情。
- c. 视觉的骚扰
例如展示春宫材料、绘画性图或书写有关性的信件、性动作。
- d. 心理骚扰
例如重复无谓的社交邀请，没有顾及感受的要求约会或肢体亲密。
- e. 肢体骚扰
例如不适当的触摸、拍打、渐进移动、抚摩、拨弄身体、拥抱、吻嘴、爱抚、性攻击。

9.3 投报性骚扰之程序

受害人或指控者可直接向人力资源部负责人报告。

人力资源部将要求受害人提出一份详细报告。受害人 / 指控人在投诉前须尽可能搜集证据。因对案情的调查十分有帮助。例如视觉骚扰的证据的信件、绘图、录像带、在口头或心理骚扰的录音证据，在非口头或姿态骚扰或肢体骚扰的证人声明。

根据冒犯严重程度，受指责者也许会被停职以待调查。如果有需要，将会进行调查或进行一场审理。

如果在调查时发现受指责者有罪，基据冒犯的严重程度，他 / 她将会面对纪律行动包括开除。

然而，如果指控人或任何一方提供伪证或证据，他们将会面对纪律行动包括开除。

9.4 投诉和抱怨之处理程序

公司将努力在最低的可能层面进行处理任何投诉或抱怨。

如果一位雇员有投诉或抱怨，应与直属上司讨论。

如果投诉或抱怨未获解决，最高层的上司有责任参与讨论，并向相关部门的经理汇报。

如果在此层面还是没获得满意的解决方案或答案，应向人力资源经理报告，人力资源经理将会和公司执行董事磋商。

执行董事对该问题的裁决将是最终的决定。

10. 其他

10.1 个人状况

为了让公司拥有最新的职员个人资料，若职员的信息有更新必须立刻通知人力资源部。有变动情况如下：

- a. 地址或电话更改
- b. 婚姻状况及配偶资料
- c. 孩子资料
- d. 考取到新的教育水准或专业资格

若有需要，职员必须复印有关证件以证实有关更新。

10.2 储物柜

职员可向公司申请储物柜，提供储物柜视情况而定。

储物柜必须时时刻刻保持清洁。若职员损坏储物柜将被纪律处分及必须承担维修费。

公司有权在没事先通知的情况下检查任何储物柜。

职员必须自行保管好放在储物柜里的财物，公司将不负责的遗失或损坏。

公司将提供钥匙。若遗失或损坏必须立刻通知人力资源部及得缴交RM10补发费。

离开公司（调动、退休、终止服务等）须将钥匙交回人力资源部。

10.3 布告栏

重要提醒，通告及其他与职员有关的重要资讯将会粘贴在公司的布告栏。因此职员必须常常参阅布告栏。

部门经理核准之通告方可粘贴在布告栏。

10.4 意见箱

管理层在海鸥大厦低层设立一个意见箱。此意见箱目的是让职员提供建设性意见或投报任何违反条规 / 利益的事件给公司。职员无需透露名字，但公司鼓励写下姓名以方便在需要更详细的资料时可联络有关职员。

全体职员鼓励善用此设备。职员的身份及资料绝对保密。公司将会奖赏提供好建议的职

员。

10.5 回教徒祈祷室

公司有祈祷室设备让穆斯林职员祈祷。穆斯林职员必须在允许的休息时间里祈祷。

职员必须时时刻刻保持祈祷室整洁。

10.6 泊车

拥有私人汽车之职员可在海鸥大厦用指定泊车位泊车。

经理级及高层则可泊车在公司前面的泊车位。

为了方便管理及检验，职员必须向行政部索取一张海鸥标志汽车贴纸。离职时需退还公司。

10.7 拨私人电话

职员应减低拨私人电话及私人电话只限紧急或重要事件而已。通话以简单及明确为准。

10.8 抽奖政策

公司对其他机构所举办的抽奖活动政策，如：供应商，研讨大会或其他。若有员工代表公司出席参与相关的活动，并从幸运抽奖环节中（如有）获得奖品，请注意以下事项：

奖品的价值	备注
RM1000或以下	员工可获得有关的奖品（包括旅游配套）。
RM1000以上	员工必须把奖品交给公司。公司将奖励相关员工。

公司保留修改和调整以上政策的

附件

海鸥反贿赂政策

1. INTRODUCTION

Beshom Holdings Berhad (“BESHOM” or the “Company”) and its subsidiaries (the “Group”) are committed to conducting its businesses in a lawful and ethical manner and maintaining high standards of ethics and integrity.

Beshom has established this Anti-Bribery Policy (“Policy”) to set out the Company’s expectations for internal and external parties working with, for and on behalf of the Group in upholding the Group’s zerotolerance stance against bribery.

This Policy shall form the keystone for the Group’s Anti-Bribery Framework and the relevant policies that constitute the Anti-Bribery Framework.

2. SCOPE

This Policy is generally applicable to the Group's Directors, Employees, suppliers, Distributors, Business Associates, and any third parties acting on the Group's behalf, unless otherwise is stated in the specific policies.

This Policy shall be applicable to all business operations of the Group regardless of country of operation.

3. WHAT IS BRIBERY?

"Bribery" refers to the act of corruptly giving, agreeing to give, promising, offering, soliciting, receiving, or agreeing to receive any gratification. Gratification can take various forms, including monetary, nonmonetary, services, favours, or any form of benefit or advantage.

[See *Section 5: Definitions* of this Policy for the legal definition of "gratification"]

A gratification that is given or received with a corrupt intent, including to induce or reward the improper performance of a party, or to obtain or retain business advantage, is considered a bribe.

The Malaysian Anti-Corruption Commission Act 2009 ("MACC Act 2009") prohibits a person or a commercial organisation from giving and receiving bribes, including via agents or associates.

[Refer to *Section 16, Section 17, and Section 17A* of the MACC Act 2009]

4. OUR ANTI-BRIBERY STANCE

- I. The Beshom Group adopts a zero-tolerance approach towards bribery and will not pay bribes to anyone for any purpose.
- II. The Group takes the upholding of its anti-bribery stance across the Group's business seriously and expects the same from stakeholders internal and external to the Group's businesses, extending to all the Group's business dealings and transactions in all countries in which it operates.
- III. Directors, Employees, suppliers, Distributors, Business Associates, and any third parties working with, for or on behalf of the Group shall adhere to and observe the Group's anti-bribery stance and relevant provisions, policies, and procedures established by the Group.
- IV. The Group treats any violation of this Policy seriously and will undertake necessary actions, including, but not limited to, review of employment or appointment, disciplinary actions, dismissal, cessation of business relationship, and reporting to the authorities, consistent with the relevant laws and regulations.
- V. The Group is committed to comply with the relevant anti-bribery laws and regulations, breaches or violation of which may cause great damages to the Group which may include reputational damage, legal fines, or even jail sentences.

5. DEFINITIONS

The following definitions and interpretations shall apply in this Policy:

- i. "bribery" refers to the act of corruptly authorising, giving, agreeing to give, promising, offering, soliciting, receiving, or agreeing to receive any gratification;
- ii. "gratification" shall have the meaning as defined in the Malaysian Anti-Corruption Commission Act 2009, i.e.:
- iii. where this Policy refers to the act of "giving" or "paying" a bribe it also refers to actions amounting to the act of agreeing to give, promising, or offering a bribe;
 - a. money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
 - b. any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
 - c. any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
 - d. any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;

- e. any forbearance to demand any money or money's worth or valuable thing;
- f. any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and
- g. any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f);

- iv. where this Policy refers to the act of "receiving" a bribe it also refers to actions amounting to the act of soliciting or agreeing to receive a bribe;
- v. "facilitation payments" shall have the definition consistent with that provided by Transparency International, which is: a small bribe, also called a 'facilitating', 'speed', or 'grease' payment, made
- vi. to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement;
- vii. "Employees" include full-time, part-time, probationary, contract and temporary employees;
- viii. "Service Providers" include the Group's contractors, sub-contractors, consultants, distributors, agent representative, or any parties performing work or services for or on behalf of the Group;
- ix. "Business Associates" include the Group's joint-venture entities, joint-venture partners, associate companies, and business partners, as well as Service Providers;
- x. "Officer of a Public Body" shall have the definition as provided in the MACC Act 2009; and
- xi. "Foreign Public Official" shall have the definition as provided in the MACC Act 2009.

6. BRIBING OF AN OFFICER OF A PUBLIC BODY OR A FOREIGN PUBLIC OFFICIAL

The bribing of an Officer of a Public Body or a Foreign Public Official is an offence under the MACC Act 2009 and is likely to be an offence under the local laws in the Group's countries of operations. Directors, Employees, suppliers, Distributors, and Business Associates of the Group who has dealings with any Officer of a Public Body or Foreign Public Official shall exercise extra care to not engage, directly or through a third party, in any activity or transaction that may constitute, or perceived to constitute, an attempt to bribe an Officer of a Public Body or Foreign Public Official.

7. GIFTS, ENTERTAINMENT AND HOSPITALITY

While the giving and receiving of gifts, entertainment, and hospitality is not prohibited, they must not be made with the intention to, or perceived to be able to, influence any business-related decisions or outcome.

Gifts, entertainment, or hospitality which may influence, or perceived to be able to influence, any business-related decisions or outcome may be construed as a bribe. Directors, Employees, Suppliers, Distributors, and Business Associates of the Group must avoid giving or receiving gifts, entertainment, or hospitality which may be construed as a bribe.

As a general principle, to avoid situations where there could be actual or perceived conflict of interest, gifts, entertainment, and hospitality shall not be given to any auditor, regulator, government department, agency, authority, or their officers (generally referred to as the "Authorities") or entities directly related to the Authority, if:

- the Group is expecting to be audited by, or to apply, obtain, or renew a licence, permit, approval, audit report or any other types of clearance (generally referred to as the "Clearance") from the Authority in the near future; or
- the Group has just applied, obtained, or renewed a Clearance (including the issuance of an audit report) from the Authority in the recent past.

All gifts, entertainment, hospitality provided by the Group or received by the Group's Directors and Employees shall be authorised, processed, and recorded in accordance with the Group's internal policy.

8. THIRD-PARTY TRAVEL

Third-Party Travel refers to travelling-related expenditures, such as travel, meals, or accommodations, incurred for legitimate business activities, such as an audit or factory visit, which is incurred by a business counterpart and paid for by the Group, or vice versa.

Inappropriate, excessive, or unnecessary Third-Party Travel poses a bribery risk, especially when the business activity in question involves a material interest of a specific party, e.g. an audit, and shall not be provided or received. For the same reason, Third-Party Travel shall not be provided or accepted for persons not relevant for the performance of the work or task in question.

All Third-Party Travel provided by the Group or received by the Group's Directors and Employees shall be authorised, processed, and recorded in accordance with the Group's internal policy.

9. FACILITATION PAYMENTS

The Group, its Directors, Employees, suppliers, Distributors, and Business Associates are prohibited from, directly or through a third party, giving or receiving facilitation payments. Directors, Employees, suppliers, Distributors, and Business Associates shall comply with the Group's **Policy on Facilitation Payments**.

Facilitation payments include unofficial and improper payments or benefits, including gifts or entertainment, provided to secure or expedite a routine or necessary action to which the Group is legally entitled. Facilitation payments are bribes and they could be small in value and solicited by both public and private sectors.

10. DONATIONS AND SPONSORSHIPS

The Group has developed internal policy on donation and sponsorship to establish the guiding policies and procedures for donations and sponsorships made by the Group.

As a general principle, to avoid situations where there could be actual or perceived conflict of interest, the Group shall not make contributions or donations to, or sponsor any events of an Authority, or entities directly related to the Authority if:

- the Group is expecting to apply, obtain, or renew a Clearance from the said Authority in the near future; or
- the Group has just applied, obtained, or renewed a Clearance from the said Authority for the Group's business activities in the recent past.

The Group has no political affiliations and it shall not make any political contribution or donations to, or sponsor any events of, political parties, unless approved by the Company's Board of Directors. Whilst Directors and Employees are not prohibited to make personal political contributions or donations to political parties, the said contributions or donations shall never be associated with the Group and must always be made under the Director and Employee's personal capacity.

11. BUSINESS INCENTIVES

Doing business or establishing new business opportunities may involve the use of business incentives, such as commissions, rebates, and referral fees, for promotional and marketing purposes or for referral to new business relationships or opportunities. That said, certain business incentives may be of questionable nature or may constitute a bribe formulated with the intention to obtain or retain undue business advantage.

The Group shall not provide business incentives which are questionable in nature or are contradictory with anti-bribery laws and regulations.

Business incentives provided by the Group are generally documented and known to all relevant personnel in the Group.

12. BUSINESS DEALINGS WITH SUPPLIERS AND BUSINESS ASSOCIATES

The Group, in selecting its suppliers and Business Associates, such as agents, consultants, distributors, or joint venture partners, places great emphasis on integrity and ethical business practices. The Group has established internal procedures which requires due diligence checking to be performed on suppliers and Business Associates before appointment or engagement.

Suppliers and Business Associates are highly encouraged to have in place adequate procedures to prevent the conduct of bribery activity, especially when performing a work or service on behalf of the Group. For business arrangement or business activity which bears a higher bribery risk, as assessed and determined by the Group from time to time, the Group may require the supplier or Business Associate involved to have in place policies and procedures to prevent the conduct of bribery activities.

13. COMPLIANCE AND SUPPORT

Directors, Employees, suppliers, Distributors, and Business Associates of the Group are expected to refuse to give or receive a bribe when solicited or offered one. The Group is committed to ensuring that no one suffers any detrimental treatment for refusing to give or accept a bribe.

Compliance with this Policy by the Group, its Directors, Employees, suppliers, Distributors, and Business Associates is mandatory. Any violation of this Policy will be dealt with seriously by the Group and may lead to, but not limited to, review of contracts, employment, or appointment, disciplinary actions, dismissal, cessation of business relationship, and/or reporting to the authorities, consistent with relevant laws and regulations.

Directors, Employees, suppliers, Distributors, or Business Associates of the Group with any concerns or queries or requiring support and advice pertaining to compliance with this Policy shall consult with their respective internal reporting lines or the Group Managing Director, the Group Executive Director cum Chief Financial Officer, or the Anti-Bribery Compliance and Support team.

If there is a suspected violation or potential violation of this Policy, such cases shall be reported via the Group's whistleblowing mechanism, as outlined in the following section.

14. REPORTING OF VIOLATIONS OF THE POLICY

Any person, including the general public, who knows of, or suspects, a violation of the Policy is encouraged to report the concerns through the whistleblowing mechanism set out under the Group's **Whistle-Blowing Policy**.

No individual will be discriminated against or suffer any sort of retaliation for raising genuine concerns or reporting in good faith on violations or suspected violations of the Policy. All reports will be treated confidentially.

15. REVIEW OF THIS POLICY

This Policy is approved by the Board of Directors of Hai-O on 28 May 2020.

This Policy shall be reviewed by the Company periodically or at least once in three years.

海鸥举报政策

1. INTRODUCTION AND OBJECTIVE

Beshom Holdings Berhad ("BESHOM" or the "Company") and its subsidiaries (the "Group") are committed to conducting its businesses in a lawful and ethical manner and maintaining high standards of ethics and integrity.

This Whistle-Blowing Policy is established to provide employees, stakeholders (e.g. shareholders, customers, distributors, suppliers, and the public) an avenue to raise genuine concerns about wrongdoings, misconduct, illegal acts, or unethical business conduct that is taking place, has taken place, or may take place in the future ("Disclosure").

2. WHAT CAN BE REPORTED?

All stakeholders, including employees, distributors, the public, etc., are encouraged to disclose any information or raise a genuine concern about serious wrongdoings, misconduct, illegal acts, or unethical business conduct including but not limited to fraud, corruption, malpractice, financial irregularities, dishonesty, criminal activities, personal misconduct, and serious breach of the Group's internal policies, procedures, or applicable codes (e.g. Code of Ethics) (generally summarised as the "Wrongdoing").

This Policy does not cover complaints or grievances relating to employment or other business with the Group, which shall

be dealt with in accordance with other existing procedures of the Group, unless they involve wrongdoings, misconduct, illegal acts, unethical business conduct.

This whistle-blowing system is not intended to be used for the following:

- general complaints about the Group’s products or services;
- matters which are trivial or frivolous or malicious or vexatious in nature or motivated by personal agenda or ill will;
- matters pending or determined through any tribunal or authority or court, arbitration, or other similar proceedings.

Any Disclosure should be based on good faith with a reasonable belief that the information and any allegation in it are substantially true. Any abuse of the whistle-blowing system will be viewed seriously and treated as a gross misconduct.

3. MAKING A DISCLOSURE

- a. A whistle-blower may make the Disclosure either in writing (including email) or orally.
- b. A whistle-blower shall include the basis or reasons for his/her concerns including as many details as possible in relation to the Disclosure. However, A whistle-blower is not expected to obtain substantial evidence of proof beyond reasonable doubt when making a Disclosure.
- c. The whistle-blower has the right to remain anonymous when making a Disclosure. However, it is usually easier to conduct a more effective and fair investigation if he/she could identify himself/herself and disclose as much information as possible within his/her knowledge.

d. First Contact Point

- i. If the whistle-blower is an employee of the Group, his/her first contact point shall be his/her direct superior or line manager. However, for any reason, if it is believed that this is not possible or not appropriate, he/she may report to the Head of Group HR, as follows:

Head of Group HR: Jessica Lim
Office No.: +(603) – 3342 3322 ext. 513
Email: jessicalim@beshom.com

- ii. If the whistle-blower is a distributor of the Group, he/she shall make the Disclosure to the SHOM Compliance Unit, via the following email: COE@shom.com.my.
- iii. If the whistle-blower is neither an employee nor a distributor of the Group, he/she shall make the report to the Head of Group HR.

e. Prescribed Persons

If a whistle-blower believes that it will be inappropriate to report to the First Contact Point, the whistleblower can make the Disclosure to any of the Prescribed Persons, as follows:

Prescribed Persons	Group Managing Director	Group Executive Director
Name	Mr. Tan Keng Kang	Mr. Hew Von Kin
Office No.	+(603) - 3342 3322, Ext:518	+(603) -3342 3322, Ext:515
Email	GrpDir@beshom.com	

For any Disclosures made via email to the Prescribed Persons, the email shall be addressed to the dedicated whistle-blowing email provided above, which is accessible by all Prescribed Persons.

For any Disclosures made via phone calls, orally, or in writing, the Prescribed Persons are generally required to inform each other of the Disclosure.

If the Disclosure issue involves any of the Prescribed Persons or any Directors, it shall be made to the Independent Directors of the Group, in accordance with **Item 3(f) below**.

f. In the case where making a Disclosure to management is a concern, then the report may be made directly to the Chairman or the Audit Committee Chairman, who is an Independent Director of Beshom, as follows:

	Chairman, Senior Independent Director	Audit Committee Chairman
Name	Mr. Ng Chek Yong	Dato' Lee Teck Hua
Email	ngcy@beshom.com	leeth@beshom.com

g. Any persons who receives a verbal Disclosure in accordance with **Paragraph 3(d), (e), or (f)** above shall put in writing the Disclosure and its details which is to be confirmed by the whistle-blower.

4. ACTIONS IN RELATION TO THE DISCLOSURE

- a. In addressing any Disclosures, depending on the seriousness of the alleged Wrongdoing, the relevant authorities within the Group shall decide on how the Disclosure shall be handled, including investigation, enquiries, and deliberations on the outcome.
- b. All alleged Wrongdoings involving fraud or bribery shall be notified to the Audit Committee, who shall have the authority to designate any person, within the Group or external to the Group, to oversee and conduct relevant investigation.
- c. All alleged Wrongdoings involving a Director or a Prescribed Persons shall be escalated to the Audit Committee, who shall handle the Disclosure, including investigation, enquiries, and deliberations on the outcome.
- d. In general, an independent party, which may be the internal audit, an external independent auditor or professional, or an Independent Director, shall always be involved in an investigation process.
- e. Any person, including Directors if any, who are related to or involved in the alleged wrongdoing concerning the Disclosure shall be excluded from the investigation, recommendation, and deliberation procedures to ensure the objectivity and independence of the Disclosure handling process.
- f. All Disclosures received and handled by the First Contact Point and Prescribed Persons are required to be summarised in a report to the Executive Risk Committee, at least once in a year.

5. BEING INFORMED AND HAVING THE OPPORTUNITY TO BE HEARD

- a. A whistle-blower shall be informed of the status of his/her Disclosure, including the outcome of the deliberation, as far as reasonably practicable, in writing.
- b. The alleged wrongdoer, which may include the whistle-blower in the event the whistle-blower is implicated or discovered to be involved in the allegation, may be asked to attend a meeting to discuss the allegations and he/she shall take all reasonable steps to attend the meeting. He/she shall be given an opportunity to answer the allegations at the meeting which shall be minuted.
- c. If an investigation is conducted on a whistle-blower who is implicated or discovered to be involved in the allegation, it shall not be treated as a reprisal against the whistle-blower but a facilitation of factfinding and decision making.

6. WHISTLE-BLOWER'S PROTECTION

- a. Every effort will be made to protect and keep confidential a whistle-blower's identity, subject to relevant legal constraints.
- b. A whistle-blower shall be protected from reprisal within the Group as a direct consequence of a Disclosure made in good faith. A reprisal refers to any disciplinary actions, which may include a warning or letter or reprimand, demotion, loss of merit, loss of bonus, suspension without pay, or termination of employment. Any such reprisal against the whistle-blower shall be consider a serious breach of this Policy.
- c. If a whistle-blower reasonably believes he/she is being subjected to harassment, victimisation, reprisal as a direct consequent of having made a disclosure under this Policy, he/she may reach out to higher authority as provided in **Paragraph 3(e) or (f)** above. Essentially, the complaint shall be processed in a similar manner as a whistle-blowing

Disclosure.

7. REVIEW OF THIS POLICY

This Policy is approved by the Board of Directors of Hai-O on 28 May 2020.

This Policy shall be reviewed by the Company periodically or at least once in three years.

道德与商业行为准则

1. INTRODUCTION

Beshom Holdings Berhad and its subsidiaries (the "Company" or "Group") is committed to conducting its businesses in a lawful and ethical manner and to driving and upholding Beshom Group's corporate values. Similarly, Beshom Group also expects the same level of integrity, honesty, openness, and transparency being upheld by the Group's Directors, Employees, Distributors, Suppliers and Business Associates when dealing business with Beshom Group.

This Code of Ethics and Business Conduct explains the standard of behaviour that Beshom expects in your daily work. The Code cannot foresee every situation that might arise in a complex business world. Rather, it identifies guiding principles to help you make decisions consistent with Beshom's values and reputation. You should also familiarize yourself with various corporate policies that provide more detailed guidance on specific issues that may affect your work. From time to time, changes in the business context or regulatory environment will create a need for new guidelines. As a result, the Code is subject to change as and when necessary.

This Code is written in English and Chinese editions. However, the English version prevails whenever there are differences in context among the 2 versions.

2. WHO MUST FOLLOW THE CODE

This Code is applicable at all times, without exception, to all members of The Board of Directors and all Beshom employees, business associates as well as third parties (such as agents, consultants) if duly authorized by Beshom when dealing or acting on behalf of Beshom are also expected to adhere to the Code.

3. COMMITTING TO THE CODE

Newly-hired employee must sign an acknowledgement that they have read and understood the Code upon commencement of his employment. All members are also required to acknowledge if there are any changes to the Code or on cases where applicable. A soft copy of the Code will be updated and posted on the intranet for viewing by any employees and directors.

4. POLICIES AND PROCEDURES OF THE CORPORATION

Each business group, division or department issues its own set of policies and procedures, in line with Beshom's corporate policies. Employees have an obligation to follow those policies and procedures in addition to those described in this Code.

5. THE RESPONSIBILITY OF EMPLOYEES

As a member of the company, you are expected to:

- Act honestly, diligently and in good faith when discharging and performing duties and responsibilities;
- Act honestly, diligently and in good faith when discharging and performing duties and responsibilities;
- assist company to promote and maintain a good, safe and healthy working environment;
- Contribute towards achieving the Company's objectives to the best of your abilities, while making decisions consistent with the Code;
- consult your superior or HR department manager if you have any questions about the Code.

If you are aware of a possible breach or violation of the Code, you are expected to:

- act promptly and in good faith by raising it with your superior and such breach or violation remain confidential

- before a full investigation is conducted. The authorized personnel will investigate the matter promptly;
- take your concern beyond your superior to Managing Director or Executive Directors if the suspected breach you have reported was not resolved;
 - report directly to Group Chairman if the possible breach involves any member of the Board and keep Audit Committee informed;
 - be prepared to cooperate in the investigations regarding violation of the Code.

6. WHISTLE-BLOWING POLICY

The whistle-blowing policy is to provide employees an avenue to raise concerns without fear of reprisal and to promote the highest possible standards of ethical and legal business conduct. The objective of having the policy is also to deter serious malpractice and to avoid crisis management, thereby promoting the best practice of corporate governance at workplace.

As an employee, you are encouraged to disclose any information or raise a genuine concern about serious breaches of Code. Any concerns about malpractice should always be raised internally in the first instance. Such breaches of code or violation of law include but not limited to fraud, corruption, malpractice, financial irregularities, dishonesty, criminal activities and personal misconduct.

- his/her immediate supervisors/ managers or higher authorities along his/her reporting line; or
- the Head of Group HR, the Group Executive Director cum Chief Financial Officer, or the Group Managing Director if the supervisors/ managers mentioned above are not applicable or contactable.

If a supervisor/ manager or higher authorities within the Group is contacted for advice and was unable to assess or determine the correct action for the situation, he/she shall further seek advice from his/her superior, as so on, or from the Group Executive Director cum Chief Financial Officer or the Group Managing Director.

Whistle-blowing is not for use to raise grievances concerning personal employment or as appeals against decisions of management unless they involve fraud. Such private grievance related to personal employment matters should be directly reported to Group HR Department. Any abuse of the whistleblowing system through raising unfounded allegations shall be subject to a disciplinary offence.

If you report a possible breach of the Code, you have the right to remain anonymous and confidentiality will be maintained. Every effort will be made to protect the whistle-blower or complainant's identity, subject to relevant legal constraints. However, it is usually easier to conduct a full and fair investigation of your concerns if you could identify yourself and disclose as much information as possible within your knowledge.

7. THE RESPONSIBILITY OF MANAGEMENT

The responsibilities of Beshom managers and directors include and go beyond those of other employees. You are expected to:

- lead by providing a model of high standards of ethical conduct, creating a positive work environment reflecting the content and the spirit of the Code;
- be vigilant in preventing, detecting and responding to any violations of the Code;
- protect those who report violations.

8. CONFLICT OF INTEREST

All members of the company shall act in the best interests of the Company whilst carrying out his or her responsibilities. Employees should not be involved or engaged in anyway with any activities which materially interferes with the proper performance of his or her duties or obligations to the Company, whether such activities are related to the Company's business or not.

The Company's code of ethics requires that all employees to avoid any conflict between their own interests and the interest of the Company. A conflict of interest will arise where an employee's ability to perform his or her Company duties may be

adversely affected by an outside appointment, relationship or activity. Employees shall not have personal or family financial interest or own shares in other companies which compete with the Company's business with the exception of the publicly traded companies or with the prior written consent of the Company.

Employee should not take improper advantage of their position as employees of the Company or of any information obtained in the course of their employment to secure personal advantage. Any action or omission by any employee for the purpose of gaining personal advantage (including for the benefit of his family or friends) as a result of knowing that the Company is contemplating or has decided upon a course of action is totally prohibited.

9. GIFTS & ENTERTAINMENT

The giving and receiving of gifts, entertainment, and hospitality could be a common business practice in managing business relationships, especially in certain countries or cultural background.

9.1 Receiving Gifts & Entertainment

An employee or his relatives should not accept cash, commission, expensive gifts, extravagant entertainment or benefits-in-kind of free or at very low costs from any company or individual doing or seeking to do business with the Company. Such personal favour might induce the employee to favour the third parties and affect the judgement as to what is the best for the company and could be considered as a bribe.

Sometimes it is a business custom and practice to receive gifts and entertainments. To avoid conflict of interest, you should follow the guidelines set as below:

- All gifts and entertainment given or received shall be in accordance with the Group's Policy on Gift, Entertainment, and Hospitality.
- You may accept gifts that are appropriate to the business relationship.
- When you receive gifts, you should report to your superior or may be required to handover the gifts to the Group Admin Department for company use or as a lucky draw gifts for staff whichever purpose that may deem fit. And such receipt shall be properly recorded by Group Admin Department.
- Customary business entertainment such as lunch, dinner, or sporting events, is appropriate if it is made known to the superior and of a reasonable nature, and its purpose is conducting business discussions or fostering better business rapport.

In cases where employee nominated by Company to attend the event or convention (with lucky draw) organised by external party such as suppliers, business partners or trade / non-trade associations, the employee shall notify the Group HR Department if they entitled to lucky draw and won the prize. Employee may take ownership on the winning prize if the value is RM1,000 and below. Employee must surrender the winning prize to Company if the prize is valued above RM1,000. The Company reserves the absolute rights to change the policy or prize limit as and when deemed fit / necessary.

9.2 Giving of Gifts & Entertainment

Entertainment expenditures may be incurred in the business. It is applicable to Sales Manager, Company Heads, or Senior Officers. Any entertainment expenses that are non-sales related should be pre-approved by Group Executive Director or Group Managing Director. The employee concerned shall refer to the Gift, Entertainment and Hospitality Policy issued by the Group for more details.

Expenses incurred for such business entertainment must be supported by receipts stating those entertainment and purpose (for those without bill, explanations must be given in writing and must sought superior's signature). Claims, which are found to be excessive or unjustifiable will not be reimbursed and the employee concerned will have to bear the cost.

A claim shall be made, appropriately with bills, through Expenses Reimbursement Form (HAIO/GP/FORM5) devised for the purpose. The Expenses Reimbursement Form shall first be submitted to the assigned superior/ higher authority, who shall subsequently verify and approve the claims.

10. CONFIDENTIAL INFORMATION

Employees are to maintain strict confidentiality of all data or information concerning the Company, or any of its associates/related companies. The data or information such as corporate proposals /exercises, costing, salary, trade secrets, processes, methods, decisions, advertising or promotional programs, distributor network structure and bonuses, customer and supplier list, business forecasts and discoveries and financial reports which have not been officially announced or are all regarded as confidential in nature. Under no circumstances should the employee divulge to any person or firm the secrets of the Company, and especially not to reveal our supplier's and customers' details to any third party, unless requested by any financial institutions, government bodies and properly authorized by the Group MD/ED and Group CFO. This provision shall be applicable even after the termination of employment with the Company.

Employees should also exercise caution to avoid misusing or unintentionally disclosing confidential information, this includes:

- Keeping electronic and paper documents and files containing confidential information in a safe place;
- Not discussing confidential matters where they could be overheard, for example, in public places such as elevators, hallways, restaurants, etc.
- Transmitting confidential documents by fax or e-mail, only when it is reasonable to believe this can be done under secure conditions;
- Restrict from using confidential documents as recycled papers; and
- Shredding off documents instead of disposing in dustbin once the documents need to be discarded.

Directors and key personnel who have access to such data and information are required to sign off a Confidentiality Statement with terms that will take effect after the cease of employment or directorship.

Non-Disclosure Agreements (NDA) shall be extended to consultants, vendors or contractors or any external party to protect and restrict the use of business information if it is required to disclose to the other party for a potential business undertaking. The NDA shall be signed off between the parties before or upon commencement of the potential business transactions.

Dealing in Listed Securities (Beshom listed shares)

The directors, principal officers (as defined under 14.02 (i) of the Bursa Main Market Listing Requirements (MMLR) are required to comply with the Bursa requirements, in relation to dealing Beshom listed shares.

An affected person must not deal in the listed securities of the company as long as he is in possession of price-sensitive information relating to the company. However, who is not in possession of pricesensitive information relating to listed securities may engage in dealings with such listed securities during a closed period provided that he / she complies with the procedures set out in paragraph 14.08 of the MMLR.

"Closed Period" means a period commencing 30 calendar days before the targeted date of announcement up to the date of the announcement of its quarterly results to the Exchange.

The company may extend the obligation to observe the requirements on dealing of Beshom listed shares to employees who though not the principal officers as defined under the MMLR but may have access to the price sensitive information in any form of sources. The named employees (the name list is at the discretion of the Company and who will be officially notified by HR Dept) are free to trade during open period and are required to practice the procedure notifying his/her intention to trade and inform the company (Group Finance Department) via a prescribed form (Notification On Dealing Of Shares During Closed Period) the details of shares purchased/sold during closed period within 3 market days immediately after the transactions, if any.

11. PUBLIC ANNOUNCEMENT

Employees are not allowed to make public statements regarding the affairs and corporate news of the Company unless it is authorized by the Board of Directors of the Company.

12. RELATED PARTY TRANSACTION

Neither the employee nor his/family shall, whether directly or indirectly, enter into any contractual arrangement or business transaction with the Company (other than employment contracts and normal staff purchase) or any of its current or prospective suppliers or customers for the purchase, sale, lease or supply of products services or others that may create a conflict of interest.

If a related party transaction (RPT) is unavoidable and base on the ground of fair competition, the employee is required to fill in a declaration form and to submit to the Group Internal Audit Department and to be approved by the Group RPT Committee. In the event the transaction involves a company director, Group Internal Audit Department shall submit the declaration form as received or compiled to Audit Committee for review and approval.

If the transaction if of material value, there is equals or above 5% of the Group Net Tangible Asset value, the related party transaction (whether involves employee or director or person connected to them) should get the prior approval from the Board of Directors and from the shareholders (if the case need so) subject to the Bursa Securities Listing Requirements.

The Company will also report all material related party transactions as required by Bursa Securities or any other regulatory bodies.

13. INSIDER TRADING

Non-public information which might influence the market price of the Beshom shares shall be kept in strict confidence until publicly released by the Board of Directors or Managing Director who is authorized by the Board of Directors. Furthermore, employees who have sensitive information which could influence the price of Beshom shares and related rights, must refrain from directly or indirectly executing transactions in Beshom shares and related rights and revealing such information to others.

14. COMPLIANCE OF GOVERNMENT RULES

Notwithstanding anything to the contrary, an employee shall not do or omit to do any act which would result in the contravention of any law in Malaysia and other rules, regulations and by laws of the States which might be applicable. The company and its employees and partners should also be aware of complying with the legal and contractual obligations in dealing with the foreign governments and regulatory agencies with which they are in contact.

15. COMPANY PROPERTY & INTELLECTUAL PROPERTY

Company property should only be used for legitimate business purpose. Employees are expected to take good care of company property and not expose it to loss, damage, misuse or theft. Company chop and any pre-printed documents bearing the Company's logo must be kept in a safe place. Similarly, employees have a duty to protect Company's intellectual property such as trademarks, domain names, patents, industrial designs, copyrights and trade secrets. Any inventions, discoveries, IT programmes, design or ideas by employees during the course of their work shall be deemed fully & completely by the Company's property.

16. PURCHASING CODE OF ETHICS

The purchasing code is a code that applies to all employees involved in the purchasing process within the Company. The purchasing employees are expected to:

- To give first consideration to the objectives and purchasing policies of the Company;
- To strive to obtain the maximum value for each ringgit of expenditure;
- To support the principle of fair competition as a basis for selecting suppliers and awarding business to suppliers (minimum two quotations must be sought for making fair comparison);
- To fully comply with the internal purchasing process of purchase requests and purchase orders when awarding business to a supplier. No purchase will be done without a properly authorized Purchasing Order;
- To authorize Purchasing Order within the approved purchase limit;
- To make every reasonable effort to negotiate an equitable and mutually agreeable settlement of any controversy with a supplier.

The above-mentioned policies are part of the purchasing policies and standard practices, purchasing employees are obliged to refer and comply with the full and detailed set of the purchasing policies apart from the Code.

17. FINANCIAL CODE OF ETHICS

As a public listed company, it is of critical importance that corporate filings and disclosure of material information to Securities Commission, Bursa Malaysia and other relevant government bodies be accurate, clear, timely and complete. The Finance & Accounts Departments bear a special responsibility to the Company. Because of this special role, all members of Finance & Accounts Departments are bound by following Financial Code of Ethics:

- Act honestly, professionally and in good faith when discharging and performing duties and responsibilities;
- Ensure due diligence is observed when disseminating financial or relevant information that is accurate, complete, timely and understandable in reports and documents that Beshom files with, or submits to, government agencies, securities commission, Bursa Securities and in other public communication;
- Refrain from directly or indirectly taking any action to fraudulently influence, coerce, manipulate or mislead persons preparing the financial statements or to otherwise take any action directly or indirectly that would cause such financial statements to be materially incorrect or misleading;
- Ensure that the company's accounts and reporting complied with applicable approved accounting standard in the country it operates;
- Give due consideration to assessing the quality of financial controls, including internal controls over Financial reporting, as well as to implementing control improvements;
- Ensure that the professional competences and skills are maintained at a level that is consistent with the responsibility of their job, with due observance of requirements from professional bodies.

18. ANTI-BRIBERY AND ANTI-CORRUPTION

This Code makes reference Beshom Group's Anti-Bribery Policy and collectively promote good and sustainable business practices (extract of this policy is available on Beshom's corporate website at www.beshom.com).

The Company and its group of companies have adopted a zero-tolerance approach to bribery and will not pay any bribes to anyone for any purpose. All employees are prohibited from soliciting, accepting, offering, or giving any form of bribes in the conduct of the Company's businesses. All employees shall refer to, understand, and comply with the Group's Anti-Bribery Policy, including the specific policies referred therein.

When faced with any attempted bribery or bribery conduct, an employee who is offered a bribe or being solicited for a bribe must refuse the offer or solicitation and report to any member of the Anti-Bribery Compliance and Support team (ABCS).

Any employee who is involved in a bribery conduct, whether as a giving or receiving party, will be dealt with seriously by the Company, including any appropriate disciplinary actions, as well as reporting to the relevant authorities.

19. HEALTH & SAFETY AND ENVIRONMENT

All employees shall take reasonable measures to minimise the impact of business operation through strengthened efforts towards protecting the environment.

The Company Safety Policy is committed to a strong safety program that protects its staff, its property and the public from accidents.

- Our objective is to conduct our business in the safest possible manner consistent with the Occupational Safety & Health Act, and any other applicable legislation.
- Employees at every level, including management are responsible and accountable for the Company's overall safety initiatives.
- Complete and active participation by everyone, everyday in every job is necessary for the safety among all workers on the job site.
- An injury and accident-free workplace is our goal.

Creating a healthy and accident-free workplace is our commitment. We believe that all accidents can be prevented and that all employees have a common responsibility to care each other and environment. The full co-operation and support from

all employees are necessary to ensure the Safety Policy and initiatives are implemented effectively.

**BESHOM HOLDINGS BERHAD AND GROUP OF SUBSIDIARIES
("BESHOM GROUP" OR THE "GROUP")
INTEGRITY AND BACKGROUND DECLARATION FORM
FOR EMPLOYEES**

Name of Person ("I"):

Position:

1. I have read and fully understood the contents of Beshom Group’s Code of Ethics & Business Conduct, including the Group's Anti-Bribery Policy and specific policies referred therein.
2. I shall at all times comply with Code of Ethics & Business Conduct laid down being essential for the proper conduct of my employment with the Group.
3. I shall continue to abide on the code of confidentiality (item 10) of the Code of Ethics & Business Conduct after termination of my employment with the Group.
4. I declare that, to the best of my knowledge: *(tick whichever is applicable)*
 I am not aware of any conflicts that I have with the Group, its personnel, or its business.
 apart from the conflicts declared below, I am not aware of any other conflicts that I have with the Group, its personnel, or its business.

	Name of Conflicted Party (actual, potential, and perceived)	Relationship with Conflicted Party	Nature of Conflict of Interest Situation with the Beshom Group and Detailed Description (e.g. shareholdings, directorships, or close family member relationship)
(i)			
(ii)			
(iii)			
(iv)			

I agree to notify the Beshom Group, as soon as practicable, on any emerging or new actual, potential, or perceived conflict of interest situations arising.

5. I declare that: *(tick whichever is applicable)*
 I have never been convicted of any crimes or offences, other than traffic offenses (if any).
 I have been convicted of the following crimes or offences, other than traffic offenses (if any).

6. Failing to comply with the Clauses 2, 3, and 4 above, the Group has the right to undertake any disciplinary action

against me for serious misconduct including suspension or dismissal or even legal actions.

Note:

You are required to disclose any conflict of interest situations with the Group, which may include, but not limited to, the following (i.e. Close Relationship - family members or related party as defined under Chapter 1 of Bursa Malaysia Securities Berhad’s Main Market Listing Requirements):

- *a director or employee of the Group having a Close Relationship with an external stakeholder of the Group, such as a supplier, distributor, customer, or a person with authority at a regulator, government agency, department, or authority which the Group is required to deal with substantially, etc.;*
- *a director or employee of the Group having a Close Relationship with another director or employee of the Group;*
- *a director or employee of the Group having a Close Relationship with a recipient of donation or sponsorship made by the Group; and*
- *a director or employee of the Group having a Close Relationship with a key competitor of the Group*

(Note: Close Relationship – "family members" or "related party" as defined under Chapter 1 of Bursa Malaysia Securities Berhad’s Main Market Listing Requirements)

I declare that all information provided in this Form is, to the best of my knowledge and belief, true, complete, and accurate. I understand that if any information is untrue, incomplete, or inaccurate, the Beshom Group reserves the right to review my employment with the Group including but not limited to contracts, employment or appointment, which may lead to disciplinary actions, dismissal, and even reporting to the authorities.

Name : _____

NRIC No./ Passport Number : _____

Signature : _____

Date : _____

APPENDIX I: CONTACT DETAILS FOR BREACH OF CONDUCT

First Contact Point	Jessica Lim (Head of Group HR)	12, Jalan Selasih Off Jalan Teluk Gadong, 41100 Klang Selangor Email: jessicalim@beshom.com
Prescribed Persons	Tan Keng Kang (Group Managing Director)	1, Jalan Kelawar, 6/4H, 40000 Shah Alam, Selangor Office No: 03-3342 3322 Ext: 518 Email: tankk@beshom.com
	Hew Von Kin (Group Executive Director)	11, Jalan SS1/2, Kampung Tunku, 47300 Petaling Jaya, Selangor

		Office No: 03-3342 3322 Ext: 515 Email: hewvk@beshom.com
Chairman	Ng Chek Yong (Group Chairman, Senior Independent Director)	No. 1D6, Block D, Lorong F, Village Grove Condominiums, Taman Satria Jaya, BDC Stampin, 93350, Kuching, Sarawak Email: ngcy@beshom.com
Audit Committee Chairman	Dato' Lee Teck Hua (Independent Director of Beshom)	No. 15A, Jalan Batu Tiga Lama, Kawasan 16, Taman Rashna, 41300, Klang, Selangor. Email: leeth@beshom.com

APPENDIX II: REPORTING VIOLATION



Reporting Violation 如何处理违反准则



Contact list - HR Online System (Code of Ethic)
联络名单 - 人事部网上系统 (道德与商业准则)

保密政策

1. 目标和目的

海鸥控股及其子公司和联营公司（“海鸥集团”或“集团”或“公司”）的所有董事、雇员和其他人员有义务在他们受雇或任职期间所收到的信息保密。此保密政策规定了海鸥集团董事、雇员和其他人员的保密责任和义务。

海鸥集团的董事、雇员和其他人员须清楚知道在其任职期间将会了解并拥有或掌握集团或第三方向集团披露不为普遍所知的信息。可能包括的信息如泄露了可能会损害海鸥集团利益，也包含可能损害“集团”利益的商业机密信息的揭露。

海鸥集团所有董事、雇员和其他人员有责任和义务对集团相关的信息严格遵守保密，并将其依法用于正当的目的上。

2. 宗旨

保密政策的宗旨是制定必须遵守的保密原则。本政策适用于所有与海鸥集团合作并有机会接触到海鸥集团机密信息的人员。

此政策（如相关）同时应用于海鸥集团签发予董事，雇员和其他人员的委任书和/或雇佣合约，以及其涉及任何与工作相关的条规，政策和程序。

3. 机密信息

机密信息是指任何还未公开让大众知晓的信息。它涉及公司技术、业务、财务、交易或其他事务。它也包括了一些商业价值较高的信息，如：集团战略提案、业务计划、商业秘密、与供应商和客户之间的贸易条款以及产品成本和利润率等商业信息，以及个人信息。

机密信息的例子包括但不限于：任何文件、创造、发明、改进、专利说明书、生产程序、设计、专有技术，营销和销售数据，配方，计划，想法，书籍，账户，数据，报告，各种文件的草稿，通信，客户信息，名单和档案，决策，产品信息，进出口信息，员工相关的信息，战略，绘图，建议，办公室前例，政策和程序，预测，预算和财务信息，包括任何呈现形式，如：海鸥集团以书面，口头或电子形式准备的任何文件或信息，可根据该信息的性质或当时披露的情况合理的视为机密信息，无论其是否在披露时被确定为“受限制资讯”。

对于还未发布/刊登的发明或设计是属于特别敏感的信息。例如，在提交专利申请之前披露未公开的发明信息或设计信息将导致该发明或设计持有者的知识产权受到不可逆转的损失。即使在提交专利申请后，也必须留意不可公开披露对发明或设计改进的相关信息，这将导致商业秘密丧失该有的保护。

4. 原则

海鸥集团期望所有董事、雇员和其他人员都能以敏感和专业的处理方式处理所有机密信息。集团董事、雇员和其他人员有义务不获取或试图获取其未经授权的信息。然而，集团也清楚知道具有明确沟通和问责制的透明度文化的重要性。因此，海鸥集团希望能维护个人和集团数据的安全，并期待所有董事、雇员和其他有关人员务必以保护集团数据安全的方式处理集团的任何机密信息。

保密的目的基本上有两个层面：（一）保护集团及其利益相关者、供应商、业务伙伴、客户和顾客们的敏感或机密信息。（二）基于集团的有效运作为考量，集团董事、雇员和其他有关人员在工作过程中有必要共享某些信息和知识，此保密政策是建立彼此信任的必要条件。

防止泄露机密信息的最佳保护措施是将有权收悉敏感信息的雇员和人员的数量保持在基本的最低人数。

任何雇员故意、重复、意外或未经授权披露任何机密信息将受到纪律处分。任何纪律行动将会考虑信息的性质如其机密性和敏感度，并妥当的处理泄露信息事件，确保违反保密政策的情况不再发生。

5. 维护保密和不披露原则

海鸥集团的董事、雇员和其他人员：

- 必须对所有机密信息保密；
- 仅限于担任海鸥集团董事和雇员在履行其职责时使用的机密信息；和
- 只能向已经知道机密信息且已知须要保密的人员和那些须要被告知机密信息的人员披露有关的机密信息（仅限于每个人都需要知道情况下）。

董事、雇员和其他人员对保密和不披露原则的义务将不包括依据法院或任何政府机构命令下所要求而必须披露的机密信息。若有以上情况，该雇员或人员须及时通知公司有关要求，以便公司根据具体情况回应并采取适当的行动。

在雇佣期结束时，海鸥集团董事、雇员和其他人员必须将以下信息/物品退还给集团：

- 所有物质形式的机密信息；
- 任何包含机密信息或部分机密信息的笔记和其他记录；
- 所有涉及机密信息的副本或注释机密信息的笔记和其他记录；以及
- 集团董事、雇员或其他人员所持有或管理属于海鸥集团的物业和资产。

即使在雇佣期结束后，对机密信息保密和不披露的义务仍将继续存在。

任何海鸥集团的董事或雇员在任职期间若被发现违反保密和不披露原则将受到纪律处分，在严重的情况下将被解雇。任何已离职的前雇员若被发现违反该保密原则可能会根据违规情况受到惩罚，公司将保留法律权力采取行动。其中包括取消/撤销有关的任何或所有的福利（如果公司向离职雇员提供了福利）。

本政策将与海鸥集团董事、雇员和人员的雇佣合同或委任函共同实行。

6. 需要知道

机密信息只能在“需要知道”的基础上披露，并且只有在必须知道的情况下才允许披露相关信息，以便能让董事或雇员有效的执行其职责。

7. 可披露信息的情况

7.1 在“需要知道”的情况下（包括从集团内部系统产生的数据），机密信息仅能在获得事先授权的情况下才能披露：

- a. 为特定目的而使用有关的信息：须获得其公司负责人或其上司（职等不低于4级）的批准；
- b. 包含范围更广的机密和敏感数据的信息；以及4级和以上职等的雇员：须经由集团董事经理/集团执行董事批准/授权：

7.2 任何机密信息均可由一方/董事/雇员（“披露方”）向任何政府或其他授权机构、监管机构、法院、证券交易所或任何其他他人披露。但仅限于以下范围：为有效履行其雇佣职责所必需的，或根据法律要求，并在每种情况下，披露方确保收悉者保留相同的机密信息（如适用），并且不使用有关获取的信息于其他目的。

海鸥集团的董事或雇员必须能够合理性的判断披露相关信息的需求。

尽管以上所述，任何机密信息可能被用于任何其他目的或已由一方披露给其他另一方人员，但仅限于：

- (i) 信息披露之时或之后，并非是披露方的过错而导致众所皆知的信息（前提是披露方在此过程中不可披露任何非公开的机密信息）；或
- (ii) 披露方能够以合理满意的方式证明，他方人员告知机密信息之前，披露方早已掌握有关的机密信息。

8. 数据存储

任何包含机密信息的书面文件皆须严密保存，不可随处置放。数据包括电话留言、电脑打印的文件、信件和其他文件。所有包含机密信息的文件/硬件都须要进行恰当的处理和保护，并将其存放在安全地方。

雇员还须要谨慎行事，避免滥用或无意中泄露机密信息。这包括了把包含机密信息的电子文件，纸质文件及其他文件档案存放在安全的地方；以及在安全条件下，才通过电子邮件或其他电子方式或手机设备传输机密文件。

9. 信息处理

所有含机密信息的材料都必须妥当处理，确保信息不会泄露给未经授权的人员

- 禁止将机密文件再循环使用；和
- 应将需要丢弃的文件撕碎或剪成碎片后才扔进垃圾桶。

10. 检讨

公司将定期检讨此保密政策，在考虑集团的需求以及因随着规则及法则上的最新发展而导致现有的履行职责受到影响的情况下，公司将对保密政策作出适当及符合时宜的修订。

纪律条规

类别一

触犯下列条规， 惩罚方法：

初犯： 口头警告

重犯： 书面警告

再犯： 开除或解雇。

1. 不遵守上司合理的命令与指示；
2. 工作懒散；
3. 无故迟到，并未能提供良好理由；
4. 无故早退或中途离开工作岗位；
5. 任何有意识的对抗行动，阻碍公司条规执行；
6. 未申请假期，而无故缺勤；
7. 无医生病假证明，而缺勤；
8. 妨碍及干搅他人工作；
9. 上下班没有记录或打工作卡；
10. 煽动或唆使他人触犯以上条规。

类别二

触犯下列条规，将被暂时停职或开除

1. 工作不专心或疏忽；
2. 工作时间睡觉；
3. 在禁止吸烟区吸烟；
4. 在公司内进行不道德行为；
5. 醉酒不清醒下上班；
6. 恐吓或致伤同事或其家属；
7. 挑拨或唆使同事对公司或其上司不满；
8. 拒绝接受公司调查或检查；
9. 在公司内举行非法会议；
10. 任何触犯法令，非法会议；
11. 参与任何形式的赌博，不管涉及金钱或无；
12. 蓄意违抗上司指示；
13. 拒绝做超时，休假或公假加班，而无合理解释者；
14. 蓄意怠惰或唆使他人怠工；
15. 煽动或唆使他人触犯以上条规。

类别三

触犯下列条规，立该解雇

1. 严重疏忽或过失造成公司财物损失；
2. 偷窃公司货物或资产挪用或亏空公司款项；
3. 在公司内偷窃同事财物；
4. 在公司内或外，骚搅或以粗暴行为对待同事；
5. 阻碍或破坏公司进行行政工作；
6. 代同事打工作卡；
7. 在公司内危害他人安全或造成财物之损失；
8. 在公司内或外攻击上司；
9. 泄漏公司机密；
10. 伪造，窜改或毁灭公司资料；
11. 任何营私舞弊，贿赂行为；
12. 煽动或唆使他人触犯以上条规。

备注：

1. 其他未列出之过失，将依据其严重性给予处理。
2. 所有部门主管，执行人员或主任授权公正执行以上纪律条规及处理下属投诉。

职员宿舍管理条例

1. 适用范围

- 1.1 凡住宿在公司提供的宿舍皆依本规则处理。
- 1.2 所有宿舍员工皆由集团人力资源部负责管辖。
- 1.3 集团人力资源部有权委任舍长处理各宿舍日常事务及监督条规的执行。

2. 住宿申请

- 2.1 凡是外地职员皆可申请住宿。
- 2.2 欲申请住宿职员住宿者，须填写'申请住宿海鸥宿舍表格'。表格可向集团人力资源部/人力资源网络系统索取。
- 2.3 所有申请者都须提前填写'申请住宿海鸥宿舍表格'，并呈交集团人力资源部批准后方可住宿。
- 2.4 申请住宿短期者(以住宿一天至一星期为准)无需填写'申请住宿海鸥宿舍表格'，但得先以口头向集团人力资源部请示核准安排后方可迁入宿舍。
- 2.5 欲住宿的新进任用职员须先由主管以口头代请示集团人力资源部核准，但须与上班后三日内填写'申请住宿海鸥宿舍表格'。
- 2.6 住宿批准将视房间有无空缺及两人同一间房为准。

3. 员工住宿守则

- 3.1 不可随意让外人及非住宿员工留宿。如有特殊情况，须提早请示集团人力资源部批准。
- 3.2 未得人事部同意，不可随意让外人进出宿舍。
- 3.3 严禁在宿舍内聚赌，喧闹或从事其他违法或违反公司利益的活动。
- 3.4 时时刻刻保持清静以免干扰他人。
- 3.5 午夜12点至清晨6点30分为就寝时间，若非急事，不得随意进出宿舍。
- 3.6 晚上11时过后不得逗留在他人寝室内。
- 3.7 男女宿舍不得随意进入及逗留在对方寝室内。
- 3.8 任何住宿员工有不当之言谈举止，或违反以上各守则的行动，舍长有权干涉，严重者可交集团人力资源部处理。
- 3.9 每位住宿员工有责任保护和善用在宿舍内的公司财物。
- 3.10 蓄意破坏公司财物者或不正当使用导致损坏应负赔偿之责。
- 3.11 如发现公司宿舍设备如冷气，雪柜，电视机，风扇等有故障，必须马上通知舍长，舍长须通知集团人力资源部去处理。
- 3.12 消耗品如煤气、报纸、洗涤剂、卫生纸等皆由宿舍员工个人或分享基础承担。若有需要，每个月可供款作为消耗品费用基金。
- 3.13 公司将向每位住宿员工征收每月象征式的水电费。此费用必须于每月15日之前缴给会计部。

4. 整洁工作

- 4.1 每位住宿员工有责任保持各自寝室的卫生整洁，不得因个人的不良习惯而影响他人的居住环境。
- 4.2 住宿员工有责任每天自行清理个人垃圾。每当发现未予处理垃圾则每位住宿员工将被罚款每人10令吉。

5. 宿舍安全

- 5.1 厨房内的电插座避免同时三头并用，以避免造成电流超负荷(尤其是烧开水时)。
- 5.2 所有电器插座须在没用时关掉以免发生触电事故。
- 5.3 煤气长时间不用时请关掉煤气头。
- 5.4 请在离开或归来时确保铁门锁上。
- 5.5 外出前须关掉寝室内所有的电源以防电线走火。

6. 其他

6.1 严重违反以上规定者，集团人力资源部可随时终止其住宿权。

6.2 以上条规如有未尽事宜，集团人力资源部可随时修订之。

公司指定医疗所名单

诊疗所名字	地点	电话号码	营业时间
Klinik Kelang	25, Jalan Goh Hock Huat, 41400 Klang, Selangor.	03-33423361	每日（包括公共假期） 8.00am - 10.00pm
Klinik Klang Anda	68, Jalan Nanas, 41400 Klang, Selangor.	03-33427916	星期一至星期五 9.00am - 1.00pm 2.30pm - 4.30pm 7.00pm - 9.30pm 星期六 9.00am - 1.00pm 2.30pm - 4.30pm 星期日及公共假期 9.00am - 12.30pm
TGGD Medical & Dental Clinic (Setia Alam)	Level 1, Top Glove Tower,16, Persiaran Setia Dagang, Setia Alam, Seksyen U13, 40170, Shah Alam, Selangor.	03-58869999	星期一至星期六 9.00am - 9.00pm 星期日 9.00am - 3.00pm

电子邮件和互联网使用政策

1. 宗旨

这份电子邮件和互联网使用政策的目的是概述当连接到组织网络或通过公司自有互联网设备时使用公司电子邮件和访问在线资源的准则和规定。该政策旨在确保公司在电子邮件和互联网的安全、完整性和其专业的使用，并促进高效、相互尊重的工作环境，同时保护组织和公司的资产和声誉。

2. 范围

这项政策适用于所有员工、承包商、顾问以及其他使用公司电子邮件，访问组织网络或使用公司提供的设备访问互联网的任何其他个人。

3. 允许使用

允许使用电子邮件和互联网进行与工作有关的活动，包括研究、与同事和客户沟通、访问与工作职责相关的在线工具或服务，以及其他直接与官方职责相关的活动。

4. 不接受的使用方式

- 4.1 严格禁止参与违反当地、州属、国家或国际法律法规的任何活动。
- 4.2 严格禁止访问、下载或分享任何非法或盗版软件、受版权保护的材料或机密信息。
- 4.3 严格禁止访问不当、冒犯性或露骨的内容，包括宣扬暴力、仇恨言论、歧视或骚扰的网站。
- 4.4 禁止利用互联网谋取个人财务收益，进行与组织无关的商业活动，以及任何未经授权的商业行为。
- 4.5 工作时间内不允许参与在线游戏、赌博或进行其他非工作相关的娱乐活动。
- 4.6 严格禁止上传或转发病毒或任何恶意软件。
- 4.7 禁止绕过网络安全措施，尝试未经授权访问其他系统或账户，或从事任何危害公司安全的行为。

5. 电子邮件使用

- 5.1 公司提供的电子邮件账户仅用于与工作职责相关的官方通信目的。
- 5.2 在所有电子邮件回复和转发中行使谨慎和专业精神，确保遵守公司的行为准则和政策。
- 5.3 未经管理层授权，不得使用电子邮件传送敏感或机密信息。所有附加的机密商业文件必须受到密码保护。
- 5.4 不转发连锁信、垃圾邮件或任何可能危及公司网络或声誉的未经授权的大规模邮件。
- 5.5 避免在公司邮箱中进行个人通讯或违反本政策的其他任何部分。
- 5.6 定期审核和管理电子邮件，以保持邮箱的高效运作。
- 5.7 及时向 MIS部门报告任何疑似网络钓鱼尝试 (phishing attempts)、可疑的电子邮件安全威胁。

6. 数据安全

- 6.1 员工在使用公司的电子邮件和互联网时负责保护敏感信息和数据。这包括在未经授权的个人分享敏感信息或将其存储在不安全的位置。
- 6.2 为所有在线帐户使用强密码，并避免在工作和个人帐户中使用相同的密码。
- 6.3 在点击来自未知或可疑来源的链接或下载文件时要小心谨慎。

7. 社交媒体和在线通信

- 7.1 在社交媒体上发布内容或参与任何与工作相关的在线讨论时要谨慎小心。
- 7.2 未经适当授权，不得泄露有关公司、其客户或同事的机密或专有信息。

8. 带宽和网络资源

避免不必要的或与工作无关的网络使用，以免对公司的网络资源造成压力或影响网络功能。

9. 监控和隐私

公司保留在公司网络和设备上监控公司电子邮件和互联网使用情况的权利，以确保遵守本政策并保护公司利益。

10. 违反政策的后果

对电子邮件和互联网使用政策的违反可能导致的纪律处分，包括口头或书面警告、停职、解雇或法律诉讼，具体取决于违规行为的严重程度和频率。

11. 违规举报

鼓励员工及时向其上级或集团人力资源部举报任何疑似违反政策的行为或安全事件。

12. 政策更新

公司保留更新或修改本政策的权利④将及时通知员工任何政策更动。

13. 确认

所有员工必须确认已经阅读、理解，并将遵守此电子邮件和互联网使用政策。

通过遵守此电子邮件和互联网使用政策，我们可以确保安全、高效的工作环境，同时维护公司的诚信和声誉。

个人资料保护通告

2010年个人资料保护法令（下称“PDPA”）旨在管制商业交易中个人资料的处理，适合应用在海鸥控股有限公司以及海鸥相关的企业公司（下称“海鸥”、“我们的”或“我们”）。在这篇书面通告所提到的“个人资料”及“处理”字眼，都必须包含有PDPA所阐明

的意思。

1. 这篇书面通告的发出，旨在通知台端海鸥正在为你或代表你处理你的个人资料。
2. 我们所处理的个人资料包括所有列在工作申请表格、聘请书等类似有关的所有资料，再加上我们可能收集到有关你本人的其他资讯，包括通过与你口头或书面沟通，以及所有其他征聘表格所取得的个人资料，但却不完全局限于这个范围。
3. 我们正在处理台端的个人资料，包括你可能在过后提供的任何额外资讯，以执行你受聘任为海鸥员工/实习生所应担当的工作，或履行你可能与我们签订的合约，以及前文所述的其他相关用途。台端有义务为我们提供你的个人资料，除非我们表明不需要。如果台端无法尽本身的义务为我们提供你的个人资料，我们就不可能处理你的个人资料以作为任何用途。
4. 此外，台端有须表明同意我们保存你的机密个人资料，诸如身份证号码、国籍、出生日期、种族类别、宗教信仰、婚姻状况、健康情况、体重身高、联系资料、驾照号码、银行户头号码等，以作为上述用途。
5. 台端可以索取或要求更改你的个人资料，并且可以通过集团人力资源部门，针对你的个人资料提出任何询问或投诉。

遵照PDPA的规定条文：(a)为了处理你想索取或更改个人资料的要求，我们可能收取一个费用；以及(b)我们可能拒绝台端有意索取或更改个人资料的要求。
6. 台端的个人资料可能会向下列单位披露，这包括我们相关的企业公司、执照持有者、稽查司、银行、政府或半官方部门/代理、管制或法定团体、商业伙伴或服务提供者，以及在上述任何用途上、或在取货时需要披露你的个人资料、或在上述任何用途的任何其他直接用途方面，你本人要求或授权向第三者披露个人资料。
7. 台端的个人资料可能被转移到马来西亚境外的一个地方。
8. 台端有责任确保你的个人资料任何时候都准确、完整而没有误导，并且这套个人资料的保存必须及时更新。
9. 我们可能要求你的协助，以获取第三者的同意，把你所提供给他的个人资料交给我们，而台端也同意会尽力而为。如果因为你无法遵守诺言而造成我们任何损失或伤害，你就必须给予我们补偿。
10. 万一这篇通告的英文版本与华文版本出现任何矛盾争议时，将以英文版本为准。

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