

THE MAS DNA

THE MAS dna

MAS
CHANGE IS COURAGE

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LIVES CHANGED FOR GOOD

Our commitment to change lives for good stems from the ethos of our founders and their belief in putting people first. This is what drives us to empower the lives we touch.

Built on the foundation of providing equal opportunities for all, we go beyond what is required to offer the best. From building world-class workplaces, providing inclusive and meaningful employment, community upliftment and women's empowerment, we stop at nothing to change lives for good.



PURPOSE

To be changemakers – enabling dreams and enriching the fabric of life on our planet.

Vision

We see a day when we clothe the world with possibility, our people and partners realize their dreams and sustainability is woven into the fabric of our industry.

Mission

We inspire our people to change the world for good.
We innovate products that are human-centered and sustainable.
We build partnerships to excel and achieve ambitious profitable growth, together.

At a very young age, my brothers and I were deeply influenced by a strong set of values instilled within our family, values that would go on to define who we are and how we lead. When we founded MAS in 1987, we brought those values with us. They became the foundation — the very DNA of our company.

From the outset, humility, trust and mutual respect, honesty and integrity, freedom with accountability, and a passion for excellence shaped the way we did business. As MAS grew, we welcomed professionals who not only brought expertise but also embraced these principles, strengthening and carrying forward the cultural fabric that set MAS apart.

Today, MAS stands as one of the largest and most respected organizations in Sri Lanka. A global company admired not only for our innovations and capabilities, but for our unwavering commitment to values and ethics. This recognition is a testament to each one of you.

As we continue to expand our global footprint and evolve into a true multinational, I urge you to hold fast to these values. Let them guide your decisions, your relationships, and your leadership.

This Code of Conduct is more than just a document. It is a reflection of our identity, and a commitment to conduct ourselves with integrity and purpose in everything we do. I trust that it will serve as a compass as you go about your work, and I invite you to take on the responsibility of becoming a custodian of the MAS way.

Thank you for upholding the legacy of MAS and for shaping the future with the same courage, character, and conviction on which we were founded.



MAHESH AMALEAN
Chairman, MAS Holdings

1. SCOPE AND PURPOSE OF THIS CODE

What is the MAS Code of Conduct?

- Translates MAS values into 'easy-to-understand-guidelines,' in a bid to support everyday decision making and actions.
- Provides us with guidelines on how to ethically engage with our stakeholders.
- Outlines the mechanisms on how to report when MAS values are not adhered to.

Why do we need a Code of Conduct?

- It reflects our pledge to uphold MAS values.
- It directs us on how to preserve the unique MAS culture.

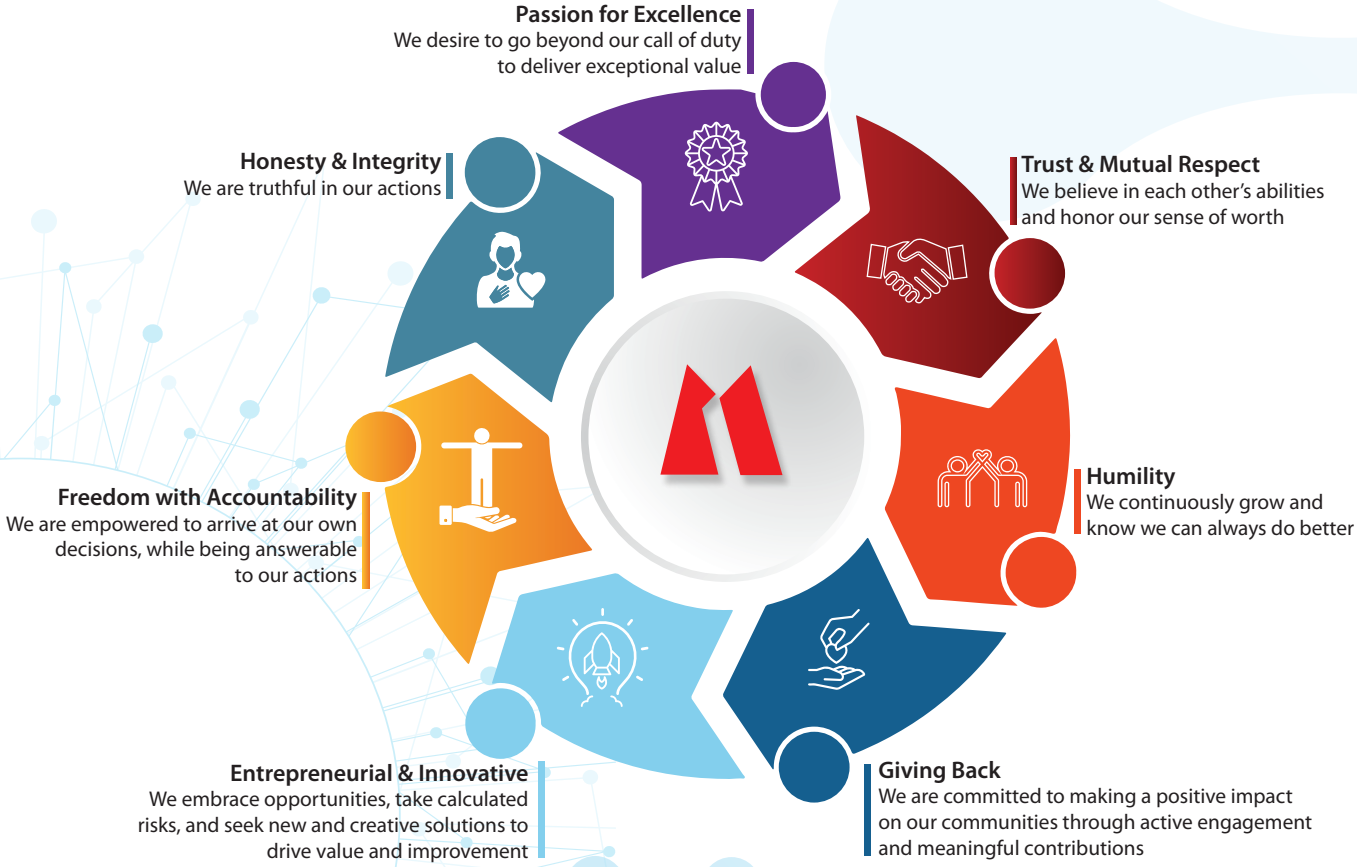
To whom does the Code of Conduct apply?

- It is mandatory for all employees, trainees, interns, contractors, and consultants of MAS, across all subsidiaries, to follow the Code of Conduct.

2. OUR VALUES

Our values, core strengths and culture form the **'MAS Building Blocks'**, upon which our corporate vision and mission are built. Living the Code will help us bring these values to life through our daily decision-making and actions, making our vision and mission a reality.

The Seven core values are:



3. BEHAVIOURAL PILLARS

I. RESPECTING PEOPLE

We treat everyone with dignity, fairness, and compassion, valuing each individual's contribution.

We at MAS, **respect our people.**

You, the exceptional employees of MAS, are the driving force behind our success story, the competitive advantage which has elevated us to greater heights.

Deriving from all walks of life, MAS is an amalgamation of a diverse group of individuals and together we strive for growth and success. Each employee serves a different purpose; therefore, you are equally valuable to us. Thus, it is important to sustain an environment which offers mutual respect, trust, and dignity.

We believe in empowering our people whilst advocating cross-cultural collaboration, teamwork, and participatory management. Humility runs through the veins of MAS, and it is a virtue which is valued by everyone.

KEYS TO CHAMPIONING THE CODE BY RESPECTING PEOPLE:

- Promote an environment which inspires professionalism, learning, personal growth, and innovation.
- Welcome diversity, fairness, and equality to promote an inclusive culture.
- Stand up against harassment and drive initiatives to prevent harassment through educative measures.
- Promote a safe and healthy work environment and proactively find solutions to possible safety hazards.
- Value life beyond work and promote a healthy work-life balance amongst colleagues.

Professional conduct

Awareness on primary work etiquette is essential for you to make an impression and earn respect. Therefore:

- Genuinely lend an ear to others' views.
- Manage conflicts with empathy; be willing to give everyone the benefit of the doubt.
- Provide honest and constructive feedback.
- Be compassionate and helpful when colleagues are undergoing trying times in their personal lives.
- Take responsibility for mistakes committed and undertake corrective measures.
- Be an ambassador of MAS in the public eye.

Careless and unprofessional behavior destroys trust, damages great relationships and tarnishes reputations. Therefore, you must be mindful not to:

- Refuse giving others a fair chance to speak.
- Create misunderstanding through lack of communication or miscommunication.
- Use aggressive actions or offensive language.
- Reprimand colleagues in public.
- Disregard upholding dignity and mutual respect.

Respecting diversity helps you to grow and stimulates an environment of trust, acceptance & appreciation. It is important to treat others fairly and promote a culture of inclusiveness. Therefore, ensure you:

- Appreciate diverse ideas, experience and skills of people and trust their ability to add value.
- Ensure HR decisions pertaining to recruitment, transfers, performance reviews, promotions, compensation, and training are based on merit.
- Support everyone equally to maximize their potential.
- Help MAS have equal representation of gender and appropriate representation of minority groups.
- Re- evaluate work processes to identify discriminatory practices and eliminate them.
- Drive initiatives which mold an inclusive culture.

Discrimination hinders motivation, loyalty & productivity. You must avoid discriminating others at all times. Therefore, do not:

- Stereotype.
- Hurl insults and make humiliating comments or jokes based on a person's distinguishing characteristics.
- Deny equal opportunities and career development based on any distinguishing characteristics.

Valuing life beyond work

Ensure you promote a healthy work -life blend. Thus:

- Lead a healthy lifestyle. Prioritize your health and wellness by exercising regularly and undertaking regular health check-ups.
- Obtain required breaks such as time off to consume meals while at work. A balanced food intake is important for productivity.
- Be productive & efficient. Aim to complete tasks within the designated time frame so that you do not consider working during your personal time.
- Proactively plan holidays. Always pre-plan your leave in consultation with the team to ensure work functions smoothly.
- Ensure the workload is equally distributed amongst colleagues.

- Work towards the fulfilment of your personal goals and aspirations. Discuss the same with your manager and identify how MAS could support such achievements.
- Ensure the safety and comfort of your team when it is necessary to stay back at office. Make sure their transport & meals are attended to.
- Encourage and support your team to fulfil personal goals.
- Refrain from expecting your team to work overtime regularly, hindering their personal wellbeing and relationships.
- Call out and ask for support when you and the team are overwhelmed and stretched beyond your control.

Promoting a safe & healthy workplace

Safety depends on responsible people and well-maintained technical equipment. Ensuring a safe and healthy workplace is your personal responsibility. Therefore:

- Follow the health and safety standards, procedures, instructions & guidelines at your Value Stream / SBU.
- Be aware of what steps need to be followed in case of an emergency.
- Prior to handling machinery and equipment, ensure you are medically fit for the task and obtain adequate training.
- Wear personal protective equipment as and when required, and refrain from working in unsafe environments.
- Promptly report work related accidents, illnesses, near misses and hazards.
- Proactively find solutions to recurring accidents and near misses.

An unsafe environment harms the physical and mental well-being of people and disrupts a smooth workflow. Eliminate health and safety hazards by ensuring you do not:

- Compromise on safety measures to save cost.
- Request others to abstain from reporting safety violations.
- Fail to inform your line manager if you are under prescribed medication which may affect your ability to complete the task.
- Consume or work under influence of alcohol/ prescribed drugs.
- Smoke or use any devices that release smoke, vapor, or other substances within non designated office premises.

II. PROTECTING ASSETS

We safeguard the company's resources and assets, ensuring their responsible and efficient use.

We at MAS, **protect our assets.**

Company assets are a foremost essential element in implementing and improving our work processes. MAS assets range from tangibles such as inventory, cash, property, plant, and equipment, to intangibles such as patents and brand image.

We believe protecting MAS assets is the key to safeguarding our company. Managing assets effectively and efficiently adds value and productivity, while alternatively reducing business risks. These actions together give us a competitive edge, helping us maximize profit.

The proper practice of honesty, integrity and transparency allows us to protect company assets prudently. We are accountable for safeguarding our assets, whilst enjoying the freedom of empowerment.

KEYS TO CHAMPIONING THE CODE BY PROTECTING ASSETS:

- Strengthen the transparency of our processes to prevent fraudulent activities.
- Safeguard the company's intellectual property and confidential information and ensure MAS has secured intellectual property rights to our innovations.
- Use effective communication techniques and retain records appropriately, enabling the smooth flow of information.
- Apply lean principles to reduce waste and ensure company property is utilized in an efficient and sustainable manner.

Uphold honesty, integrity, and transparency at all times. Ensure you :

- Follow due protocols in managing company funds. MAS follows a strict audit process which governs these protocols.
- Use company funds only for the intended purpose.
- Obtain approval from authorized personnel before processing a payment.
- Be honest and follow relevant processes when applying for medical and insurance claims.
- Monitor payments carefully, watch out for questionable transactions and be alert of possible occurrences of fraud. Report them immediately to relevant internal authorities.
- Report irregularities which may lead to possible misuses of infringement of company funds.
- Comply with the provisions of the international anti-fraud acts by which we are bound.
- Exercise due diligence in selecting firms to represent MAS when dealing with third parties.
- Refrain from fraud.

Taking care of company property

- Use them only for legitimate and reasonable business purposes.
- Purchase company property via the appropriate procedure.
- Protect company property from theft, loss, damage, or misuse, especially outside MAS premises.

- In the event company property is stolen or lost, immediately inform the authorized personnel & security.
- Manage company property effectively, efficiently and in a sustainable manner.
- Repair damaged resources promptly by handing them to the authorized personnel.
- Return common assets in due time and good state after use.
- Maintain a clean and organized workspace confirming to 6S standards.
- Handover all individually owned company property in the event you leave MAS.

Refrain from damaging or misusing company property by ensuring you do not:

- Take part in any illegal activities on or using company property.
- Vandalize company property.
- Take part in any illegal activities.
- Sell, lend, give away or dispose company property without prior written approval from the authorized personnel.
- Repair company property via personal means.
- Refrain from misusing company property for personal gains, directly or indirectly in a manner which incurs a cost upon MAS.
- Violate 6S Standards in terms of managing company property.

Protecting intellectual property and confidentiality

What is intellectual property?

Intellectual property includes intangible rights protecting the products of human intelligence and creation, such as copyrightable works, patented inventions, trademarks, and trade secrets.

In protecting intellectual property and confidential information, ensure you:

- Store confidential information at your workstation in a secure manner.
- Use secure passwords.
- Disclose confidential information only for legitimate business purposes with prior authorization.
    - ▸▸ Necessitated by a legitimate justifiable and clear business need.
    - ▸▸ Authorized by your manager.
    - ▸▸ Subjected to a written non-disclosure agreement.
- Share confidential information among colleagues on a need-to-know basis.
- Guide all visitors of MAS to comply with our confidentiality standards.

- Permit access to employee personal information only for legitimate business purposes with prior authorization.
- Use the MAS logo appropriately in all business communications and printed materials. .
- Protect MAS and its associate brands from infringement when dealing with third parties.

Refrain from infringing our intellectual property and confidential information by ensuring you do not:

- Share confidential information of MAS with customers, suppliers, friends, family or third parties without proper authorization.
- Talk about confidential information in public.
- Enter into non-disclosure agreements without authorization.
- Share personal information, email phone records, etc. of colleagues without legitimate business purposes and prior authorization.
- Misuse the company logo in any internal business communications.
- Infringe intellectual property rights of other companies or individuals by utilizing any material originating from a third party, without their authorization.

Communicating appropriately and retaining records

- Maintain accuracy, clarity and conciseness when using emails, compiling reports, and maintaining company records.
- Record all expenditure including accounting records, expense reports, invoices, and payroll records accurately and in compliance with regulation.
- Correct any inaccuracies in records or inform authorized personnel of such occurrences immediately.
- Ensure that no undisclosed or unrecorded account, fund or asset is established or maintained.
- Use communication channels which deliver the message more efficiently and ensure the receiver understands the information disseminated.
- Store information appropriately and make it available only to authorized personnel.
- Abide by the stipulated time frames in maintaining organizational records.
- Dispose of company data in a secure manner after use.
- Protect your online identity and prevent unauthorized access.
- Conduct yourself responsibly on social media.

When communicating ensure you do not:

- Falsify, omit, misstate, alter, or conceal any information or misrepresent facts on a company record.
- Encourage or allow anyone else to compromise the integrity of information.

- Publish the company email or mobile number on public documents, regarding which MAS has no interest.
- Communicate negative messages about MAS which could harm its reputation on public forums.
- Remove or destroy company records prior to the specified date without consent of the authorized personnel.

III. VALUING CUSTOMERS

We prioritize our customers' needs, delivering exceptional service and building lasting relationships.

We at MAS, **value our customers.**

A customer is anyone whose need, want or demand we intend to fulfil through the work we undertake. We have two types of customers

- **External customers –** Those who buy the end product or service from us, usually external to MAS.
- **Internal customers –** Those who depend on us for information and services, usually within MAS.

Our customers are equal partners in a mutually beneficial relationship. They add purpose to our role at MAS. We are where we are today because of the strong bonds we have established with our customers, over the years. Together, we have worked towards developing win-win situations and this is how we sustain our business.

We earn our customers' confidence, mutual trust, and respect by upholding integrity and building credibility. We are honest, respectful, and passionate towards creating exceptional value. Our passion for excellence is not an act, but a habit. Our entrepreneurial and innovative thinking enables us to continuously deliver excellence to our customers. We are assertive, while being cautious. We strive to go the distance, while holding ourselves accountable within the boundaries of ethics.

KEYS TO CHAMPIONING THE CODE BY VALUING CUSTOMERS:

- Build customer confidence and trust by creating win-win situations.
- Leverage on lean principles and continuous improvement, to deliver best-in-class products and services.
- Challenge yourself. Be innovative and push limits to deliver excellence.
- Work towards strengthening existing customer relationships and building new ones.

IV. SUSTAINING RELATIONSHIPS

We nurture long-term relationships based on trust, collaboration, and mutual benefit.

We at MAS, **sustain our relationships.**

Our relationships are the bonds and partnerships we have established with various entities and people both in and out of MAS.

We consider relationships with internal and external stakeholders as essential elements to succeed in a dynamic business environment. We are able to deliver holistic solutions to customers by managing our relationships seamlessly with all stakeholders. Together we are stronger and together we will prosper. Therefore, it is vital to maintain utmost transparency in all our relationships.

KEYS TO CHAMPIONING THE CODE BY SUSTAINING RELATIONSHIPS:

- We promote an environment which prevents conflicts of interest.
- We build and sustain relationships based on our credibility as an organization.

V. NURTURING COMMUNITIES

We actively support and invest in the communities where we live and work, fostering growth and development.

We at MAS, **nurture our communities.**

We are constituted not only of a fully-fledged business, but also of the dreams and aspirations of a whole community.

The roots of MAS run deep into rural communities within which most of our SBUs operate. When we build a village, we ensure there is a good school for our children, a hospital for our parents to obtain treatment from and more jobs for the youth. By nurturing and giving back to communities, we invest in the future of our people.

We volunteer to serve our communities with respect and humility. Collaboration, team effort and unity enable us to empower communities in ways beyond imagination. Channeling this spirit into the MAS working environment has resulted in a winning combination of team effort, ambition, and accountability.

KEYS TO CHAMPIONING THE CODE BY NURTURING COMMUNITIES:

- We volunteer for group-wide activities to uplift the living standards of our communities.
- We drive initiatives which empower communities in order to build sustainable relationships.
- We strive to promote sustainable business practices in protecting people, the planet, and profits.

VI. COMPETING ETHICALLY

We uphold the highest standards of integrity and fairness in all our business dealings.

We at MAS, **play fair by our competitors.**

We believe our competitors also have an equal opportunity to serve our customers. We, however, focus on delivering exceptional value, which will provide us with more opportunities to better serve our customers.

Healthy competition is essential for the progression of an industry. It is a constant motivator which drives us to push our boundaries, break through our comfort zones and strive for excellence. Healthy competition makes us think out of the box and inspires productivity, innovation, and growth.

We compete with integrity. We never give up when we are falling behind, but we also remain humble when we are ahead in the game. We continue to focus on excelling our product, while collaborating with our competitors to create sustainable value.

KEYS TO CHAMPIONING THE CODE BY COMPETING ETHICALLY:

- We drive initiatives which promote free and fair competition while elevating the industry.
- We strive to relentlessly build on our unique selling proposition to maintain our competitiveness in the market.

VII. COMPLYING WITH THE LAW

We adhere to all applicable laws and regulations, maintaining a strong ethical framework in our operations.

We at MAS, **comply with the law.**

We comply with the regulatory framework and uphold good corporate governance.

We believe compliance is essential and is an integral part of MAS. While we comply with local and international laws, we also have our own corporate governance framework, which consists of policies and procedures. These direct and control the entire operational process of the organization.

The MAS corporate governance framework reflects our accountability, integrity, and transparency. The framework also signifies the importance we place on "processes" and how well we collaborate with our stakeholders.

We ensure all stakeholder interests are protected. Regulations are practiced and applied to protect and strengthen the organization, while promoting its credibility, growth, competitiveness, and sustainability.

KEYS TO CHAMPIONING THE CODE BY COMPLYING WITH THE LAW:

- We comply with local and international laws of the countries in which MAS operates in.
- We drive initiatives which promote good corporate governance across the company.

"At MAS, we have always believed that an empowered culture is defined not by what we say, but by what we do every day. It's about taking ownership as individuals, as teams, and as one organization to act with integrity, courage, and respect for humanity. When we hold ourselves to the highest standards and do what's right, we not only deliver results, but we also build trust and shape a culture that endures.

On a personal level, this belief guides how I lead and how I show up each day to listen, to enable, and to create space for our people to bring their best selves forward, because true empowerment, to me, is when every individual feels valued, trusted, and accountable for making a difference."



SUREN FERNANDO
Chief Executive Officer
MAS Holdings (Private) Limited

FRAUD

We are committed to acting with honesty, integrity, and transparency in everything we do. We do not engage in bribery or fraudulent activity, and we do not influence decisions through improper means. We always act in the best interests of MAS, ensuring that our actions do not result in personal gain at the expense of the company. MAS has zero tolerance for fraud and fraudulent activities.

What is 'Fraud'?

Fraud occurs when someone intentionally acts dishonestly to obtain a personal benefit or advantage at the expense of MAS.
Fraud can take many forms, including misuse of assets, false claims, or manipulation of information.

What You Must Do

Act with integrity in all financial and business activities. In practice, this means:

- Follow approved processes when managing company assets, resources, and funds
- Use company assets, resources, and funds only for their intended purpose
- Obtain the required approvals before making or processing payments
- Be honest and accurate when submitting medical and insurance claims
- Pay attention to transactions - question anything unusual or unclear
- Raise concerns immediately if you notice possible misuse or irregularities
- Comply with applicable laws and regulations (e.g., Anti-Corruption Act, FCPA)
- Exercise care and due diligence when engaging with third parties on behalf of MAS

All employees have a duty to actively prevent, detect, and report suspected fraud, and to fully cooperate with investigations.

What You Must Not Do

You must not:

- Use your role, authority, or access for personal gain
- Submit false or misleading claims, including expenses or insurance claims
- Misuse company funds, assets, or resources
- Manipulate or falsify records, information, or documents
- Offer, give, or receive anything of value to gain an improper advantage
- Approve or process transactions that do not comply with company policies
- Override or bypass internal controls or approval processes
- Engage in any activity that could result in loss, misuse, or reputational damage to MAS

These examples are not exhaustive.

Maintaining integrity is everyone's responsibility. Therefore, irrespective of who is being affected by the non-compliance, it is your responsibility to raise the concern immediately for the well-being of MAS. You must speak up if:

- You believe you may have violated this Code
- You become aware of a possible violation by someone else
- You observe behaviour that seems unethical or improper
- You suspect that fraud or misuse may occur

If you speak up in good faith, you will be supported and protected. All concerns are handled confidentially and investigated fairly. Any suspected fraud will be taken seriously and investigated promptly.

Engaging in fraudulent conduct will result in disciplinary action, up to and including termination of employment, in line with MAS's Consequence Management Framework, and may also lead to legal action where applicable.

My colleague is planning to submit a false medical bill to attend to an urgent personal financial need. I know this is unethical, but I am not in a position to advise her otherwise. What can I do?

Honesty is an integral part of our DNA. MAS provides medical insurance to its employees to ensure their sound health and well-being. Therefore, we trust our employees to be honest when submitting medical claims. Advise your friend not to submit the bill. Encourage her to speak to the respective Line Manager about her financial needs. We will do our best to support our employees in times of need.

I was given a company vehicle to attend a workshop. On my way home, I diverted from the original route to attend to some of my personal needs. The cost was higher than usual as the regular mileage had been exceeded. Does this amount to fraud?

At MAS, we provide transport to ensure you are able to execute your duties comfortably. We trust you to refrain from using company vehicles for personal gain. Inform your Finance Department of the matter, settle the extra cost incurred and ensure it is not repeated.

I recently overheard suspicious conversations between two of my colleagues. I suspect the possibility of a fraudulent act being attempted. I want to report it. But I could be wrong, and it could also damage my colleagues' reputations. What should I do?

If you have reasonable evidence to suspect possible fraud, you need to report it via the DNA Help Desk/Hotline. Even if this proves to be a false alarm, we will not reprimand you if it was reported in good faith. We conduct our investigations in a fair, objective, and confidential manner which protects people's reputations.

In this case, accepting the kickback would mean compromising your professional integrity and the company's interests in exchange for personal gain. It distorts fair competition, undermines procurement integrity, and exposes both the individual and the organization to serious legal and reputational risks. Recognizing and rejecting such offers is critical to upholding ethical standards and ensuring transparent and fair business practices.

Principle and rules

Staff members shall not commit acts of corruption and shall not use intermediaries, such as agents, consultants, advisers, distributors, or any other commercial partner with the aim of committing such acts.

Private Sector-106-ACA *(Source: Anti-Corruption Act no 9 of 2023)*

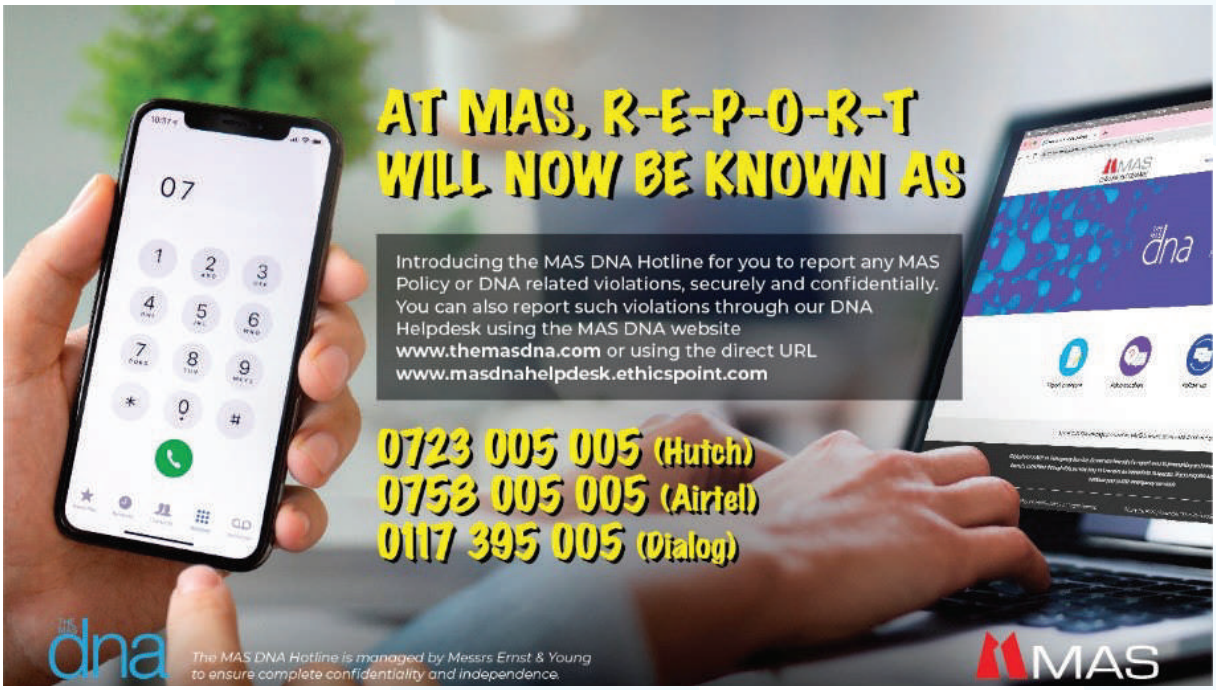
(1) Any person who, in the course of any economic, financial or commercial activity, offers, directly or indirectly, a gratification on behalf of himself or another person to any employee in any capacity or a director in a private sector entity, in order to commit any act or refrain from committing any act in breach of his duties, commits an offence of bribery under this Act and on conviction be liable to a fine not exceeding one million rupees or to a term of rigorous imprisonment not exceeding seven years or to both such fine and imprisonment.

(2) An employee in any capacity or a director in a private sector entity, in the course of economic, financial or commercial activities, solicits or accepts, directly or indirectly an advantage, for himself or for another person, in order to act or refrain from doing any act in breach of the duties of such employee or director, commits an offence of bribery under this Act and on conviction be liable to a fine not exceeding one million rupees or to a term of rigorous imprisonment not exceeding seven years or to both such fine and imprisonment.

4. AVENUES OF SPEAKING UP

I. DNA Hotline

The DNA Hotline is a confidential phone service available to employees for reporting concerns or violations of the Code of Conduct. It allows employees to speak freely about issues they encounter without fear of retribution.



II. DNA Help Desk [MAS DNA Website – Report A Concern]

The MAS DNA website features a dedicated section for employees to report concerns or violations online. This platform ensures privacy and provides a convenient way for employees to submit their reports securely and anonymously.

III. Group, Value Stream and SBU Level Code Officers

Code Officers at the Group, Value Stream, and Strategic Business Unit (SBU) levels are designated individuals who can assist employees with concerns regarding the Code of Conduct. They offer guidance, support, and ensure that issues are addressed appropriately within their respective areas.

IV. HR / ER Representatives

Human Resources (HR) and Employee Relations (ER) representatives are available to help employees with any Code of Conduct issues. They provide support and advice, and ensure that all concerns are managed in line with company policies and procedures.

V. Grievance Boxes

Grievance boxes are placed in accessible locations within the workplace for employees to submit written concerns anonymously. These boxes are regularly checked, and all submissions are reviewed and addressed by the appropriate authorities.

REPORT AND SUPPORT

- We trust you to report concerns in good faith. **Do not level false allegations intentionally**, in a bid to tarnish reputations. Such unfounded allegations may lead to serious personal and professional damage. Doing so amounts to non-compliance of the Code and can lead to disciplinary action, up to and including termination.

- However, you are not expected to produce unquestionable evidence in support of a concern. A genuine doubt backed by reasonable evidence, is sufficient enough to raise a concern. **MAS does not take action if you report a concern in good faith** regardless of whether or not the concern raised is ultimately found to be correct.

- We may need your support to verify information from time to time, with regard to all investigations pertaining to non-compliance. Therefore, we trust you to be open, honest, and cooperative if we reach out to you with regard to such investigations.

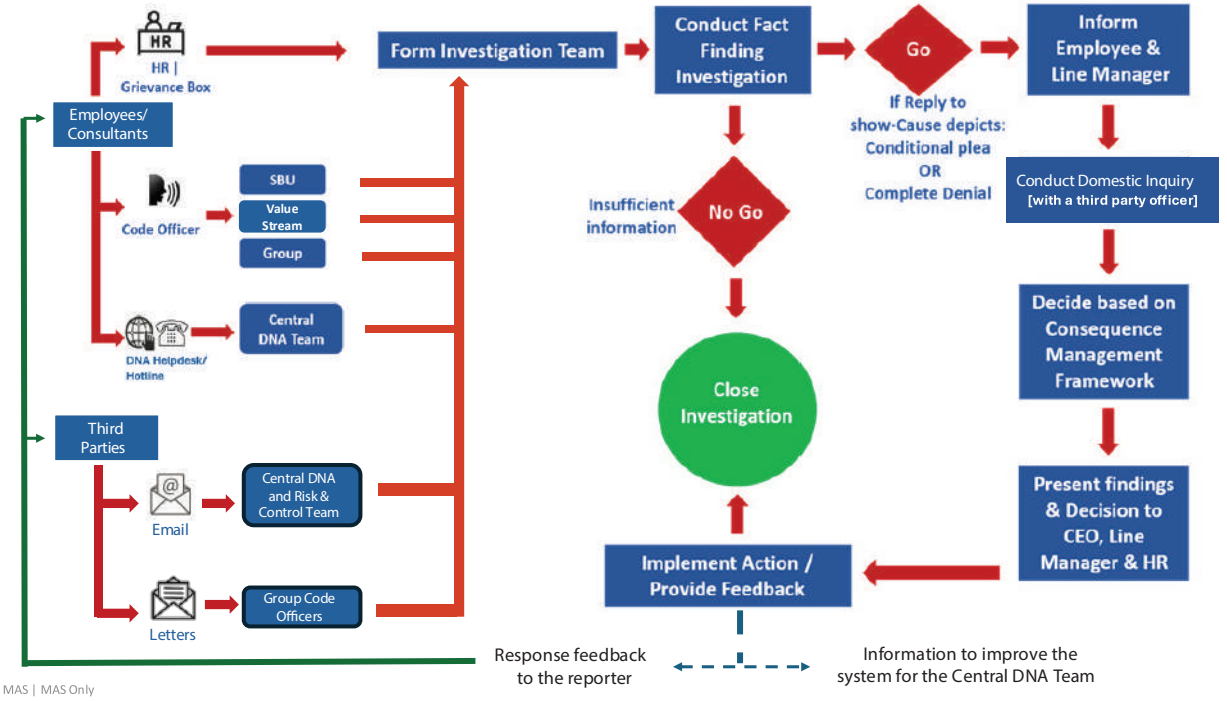
5. INVESTIGATION PROCESS

MAS investigation process provides a comprehensive guideline for handling misconduct within MAS companies, aimed at HR teams and Code Officers. Misconduct is defined as any act or omission that disrupts the organization's smooth functioning and can include violations of MAS values or policies, non-adherence to laws, company rules, breaches of duty or discipline, moral delinquency, collective misconduct, and actions outside the workplace that negatively affect employment or the company.

The investigation procedure starts with the receipt of a complaint, which can be reported through various channels and must be documented on the central DNA platform. A preliminary investigation follows, involving interviews with the complainant, collection of evidence, and necessary remedial actions. If a prima facie case is established, a show cause letter is issued to the accused, requesting their response within five working days.

If the charges are disputed, a Domestic Disciplinary Inquiry (DDI) is conducted to ensure fairness, potentially involving external experts. Based on the findings, actions are taken according to the Consequence Management Framework, which may include warnings, suspensions, withholding pay, job role changes, internal transfers, or termination.

Accountability for adherence to this policy lies with the Value Stream/ Business Unit HR heads and DNA in-charge persons. Confidentiality is maintained throughout the process, with no retaliation against individuals reporting or participating in investigations. Baseless complaints made with malicious intent will result in action against the complainant.



I. RECEIPT OF COMPLAINT:

Employees can report grievances or violations of policies, procedures, rules, guidelines, and MAS values by other employees through various channels: HR, grievance box, code officers, or the DNA helpdesk/hotline. Third parties can report such concerns via email or letter to the designated email inbox/persons as outlined in the MAS whistleblowing policy [Section 8 - XI].

II. FORM INVESTIGATION TEAM:

Once a grievance/complaint is reported, an investigation team is formed to look into the matter.

III. CONDUCT FACT-FINDING INVESTIGATION:

The investigation team conducts a fact-finding investigation to gather all necessary information about the complaint.

IV. DECISION POINT - GO OR NO GO:

If there is sufficient information from the investigation, the process moves to a "Go" decision.
If there is insufficient information, the process results in a "No Go" and the investigation is closed. This will be communicated to the party raising the complaint.

V. INFORM EMPLOYEE & LINE MANAGER:

If the decision is a "Go," the employee and their line manager are informed about the findings and the next steps.

VI. CONDUCT DOMESTIC INQUIRY:

A domestic inquiry is conducted to further investigate the issue in detail.

VII. DECIDE BASED ON CONSEQUENCE MANAGEMENT FRAMEWORK:

Based on the findings of the domestic inquiry, decisions are made using the consequence management framework. Possible actions include termination, written warnings, variable pay withheld, promotions and/or benefits withheld, cautionary letter, verbal warning, final warning, transfer, and legal action.

VIII. PRESENT FINDINGS & DECISION:

The findings by the investigation team and inquiry are presented to the relevant HOD or Exco member and a decision is made at the appropriate management level, with the guidance of HR and Code Officers.

IX. IMPLEMENT ACTION / PROVIDE FEEDBACK:

The decided actions are implemented, and feedback is provided to the relevant parties. It is essential that feedback is given to the complainant once the decision is made.

X. RECORD CASES ON CENTRAL PLATFORM:

All cases, actions taken, and outcomes are recorded on a central platform to ensure proper documentation and for future reference. Throughout this process, the central DNA team is responsible for providing information to improve the system, ensuring that any insights gained from the investigation help enhance future grievance/complaint handling procedures.

6. CONSEQUENCE MANAGEMENT FRAMEWORK

This table is a consequence management framework designed to assess and categorize the impact of distinct types of actions or behaviors based on their severity and the level of intention behind them. The framework is divided into several key sections:

MAS CONSEQUENCE MANAGEMENT GRID

	Impact Description	Level of Intention			
		Honest Mistake	Careless	Repeat Offence	Intentional
		Unaware, not trained, unintentional	Aware but did not follow due process / lack of understanding	Repeatedly makes the same mistake with no respect for the process	Tries to override process/elude control, hurt/harm, or enjoy personal gain
Severe	• **Financial** – Long term impact on MAS or divisional level finances. Losses not recoverable beyond the next financial budget, thereby jeopardizing critical business functionality. • **Service Delivery** – Disruption to multiple critical deliverables. Causes serious and prolonged problems for customers and stakeholders. This could include manipulations/violations that amount to fraud or illegal activity. • **Reputation** – Affects MAS's long-term credibility with customers and stakeholders. Loss of public trust. Severe consequences that may incur prolonged public scrutiny and media attention. This could include a direct conflict of interest which was not disclosed or disclosed, and protocol has not been followed. • **People** – Behavior and conduct that negatively affects an individual, a group of individuals, or a team's mental health and performance or physical safety. This may include physical violence or severe verbal abuse, any form of sexual harassment, sexual bribery, intimidation threats or retaliation. Such behavior may be repeated or not and is considered a serious offence. • **Health and safety** – Reduced workforce capability/capacity, threatening long term service delivery. Death or permanent disablement. • **Environmental** – Permanent damage to the environment.	Medium	High	Extreme	Extreme
Major	• **Financial** – Medium term impact on MAS or divisional level finances. Losses not recoverable within the current financial budget. • **Service Delivery** – Disruption to a critical deliverable. Threaten the completion of a strategic program/project and business case benefits. Causes problems for customers and stakeholders in fulfilling their obligations. This could include manipulation of records/ violating processes that could lead to fraud. • **Reputation** – Have a detrimental effect on the divisional short-term credibility with customers and stakeholders. Short term public scrutiny / media attention. This could include a situation of potential conflict of interest which was undisclosed. • **People** – Behavior and conduct that negatively affects an individual, a group of individuals, or a team's mental health and performance. This may include threats or fear of violence, harsh language, inappropriate or unprofessional comments, any comments of a sexual nature, and other intentional acts. Such behavior may be repeated or not and is considered a serious offence (intentional in nature – can be a repeat offence). • **Health and safety** – Serious injury or work caused illness. • **Environmental** – Long term detrimental impact on the environment.	Medium	High	High	Extreme
Moderate	• **Financial** – Short term impact on SBU finances. Losses recoverable within the current financial budget. • **Service Delivery** – Interruption to SBU level essential performance targets. Threatens the realization of project benefits. • **Reputation** – Cause customer and/or stakeholder dissatisfaction and has a negative effect on the SBU's credibility and stakeholder relations. Incur significant review or change of manner of delivery. • **People** – Behavior and conduct that negatively affects a group of individuals or a team's mental health and performance (Unintentional in nature). • **Health and safety** – Reduced workforce capability/capacity affects service quality. Injury/illness requires medical treatment. • **Environmental** –Short term impact on the environment; able to be contained with specialist assistance.	Low	Medium	High	High
Minor	• **Financial** – Minimal impact on departmental finances. Losses recoverable within the current financial budget. It would have some minor financial implications requiring a review of internal financial controls. • **Service Delivery** – Minor interruption to service/s and associated service performance targets. It would be detrimental for some aspects of a program or project. • **Reputation** – It would cause some customer or stakeholder complaints requiring additional management. • **People** – Behavior and conduct that negatively affects an individual's mental health and well-being (unintentional in nature and exclude any behavior that could amount to sexual harassment). • **Health and safety** – Reduced workforce capability/capacity affects operational processes. Localized first aid required. • **Environmental** – Minimal impact on the environment.	Low	Low	Medium	Medium

I. IMPACT DESCRIPTION

The impact of actions is categorized into three levels of severity:

Severe

- Financial: Long-term impact on finances, leading to significant unrecoverable losses.
- Service Delivery: Disruption to multiple deliverables, causing prolonged issues for customers and stakeholders. This could include acts that amount to fraud/illegal activities.
- Reputation: Severe impact on credibility, leading to public scrutiny and media attention. This could include violations related to a direct conflict of interest.
- People: Negative and intentional physical or mental behavior leading to violence. This may include severe verbal abuse, any form of sexual harassment, sexual bribery, intimidation threats or retaliation.

- Health and Safety: Threatening long-term delivery due to reduced workforce capacity or causing death or permanent disability.
- Environmental: Permanent damage to the environment.

Major

- Financial: Medium-term financial losses unrecoverable within the current budget.
- Service Delivery: Disruption threatening the completion of projects and causing significant problems for customers. This could include manipulation of records/ process violations that could lead to fraud.
- Reputation: Short-term damage to credibility, attracting public scrutiny. This could include a situation of undisclosed potential conflict of interest.
- People: Negative behavior affecting mental health and performance, including repeat offenses. This may include threats or fear of violence, harsh language, inappropriate or unprofessional comments, any comments of a sexual nature, and other intentional acts.
- Health and Safety: Serious injury or work-caused illness.
- Environmental: Long-term detrimental impact.

Moderate

- Financial: Short-term financial losses recoverable within the current budget.
- Service Delivery: Minor interruptions affecting performance targets.
- Reputation: Customer or stakeholder dissatisfaction.
- People: Negative effects on mental health and performance (unintentional).
- Health and Safety: Reduced service quality requiring medical treatment.
- Environmental: Short-term impact manageable with specialist assistance.

Minor

- Financial: Minimal impact on finances, possibly requiring review of internal controls.
- Service Delivery: Minor interruptions requiring additional management.
- Reputation: Minor customer or stakeholder complaints.
- People: Minor negative effects on mental well-being (unintentional and excludes any behaviour that could amount to sexual harassment).
- Health and Safety: Minor impacts on operational processes.
- Environmental: Minimal impact.

II. LEVEL OF INTENTION

The actions are evaluated based on the individual's level of intention, categorized as follows:

- Honest Mistake: Unaware, not trained, and unintentional.
- Careless: Aware but did not follow due process due to a lack of understanding.
- Repeat Offence: Repeatedly making the same mistake with no respect for the process.
- Intentional: Deliberately overriding the process for personal gain or to harm.

III. RISK LEVELS

Based on the impact and level of intention, the actions are assigned a risk level:

- Low: Minor impacts with honest mistakes.
- Medium: Moderate impacts with honest mistakes or careless actions.
- High: Severe or major impacts with careless actions or repeat offenses.
- Extreme: Severe impacts with repeat offenses or intentional actions.

IV. COLOUR CODING

The framework uses color coding to quickly identify the risk level:

- Green: Low
- Yellow: Medium
- Orange: High
- Red: Extreme

V. RECORDING CASES ON A CENTRAL PLATFORM

All cases, decisions, and actions taken are recorded on a central platform to ensure transparency, proper documentation, and future reference. This helps in tracking patterns, improving processes, and ensuring accountability.

VI. ACTIONS RECOMMENDED UNDER THE FRAMEWORK

Risk Rating	Consequence / Action
Extreme	• Immediate suspension of employment (with pay). • Show-cause letter and internal inquiry (in consultation with EFC). • **Immediate separation leading to termination** of employment (Employee placed on exit track). • **Legal action** as appropriate depending on the facts and circumstances, in consultation with EFC.
High	• Show-cause letter and internal inquiry (in consultation with EFC). • Concerned employees may need to be **transferred** or separated from the organization. Any separation agreement should be signed off by the Head of Division. • In the event that the employee is to remain employed, he/she shall **not be considered for promotions** for a minimum of 2 years. **Variable pay will be withheld** for this period. • Any other **discretionary payment** such as increments and bonuses may be **withheld** for an agreed upon period. • **Discontinuation of Company-Provided Benefits** (Flexi work arrangements) • **Self-paced training** (If it is a MAS Value or MAS DNA Policy violation, mandatory self-paced training will be provided to the employee in question.) • **Development plan** will be determined and developed by HR and HOD. • **A mentor** will be appointed for an agreed-upon period (6 to 9 months). If it is a behavioral issue, the mentor should be assigned by HR, and a formal sign-off from the mentor can be obtained by the DNA (Discipline & Accountability) team.
Medium	• Show-cause letter and internal inquiry. • **Written warning** (To be placed in employee's personal file) • A maximum of **20% of variable pay** may be withheld. • Any other **discretionary payment** such as increments and bonuses may be withheld for an agreed upon period. • **Discontinuation of Company-Provided Benefits** (Flexi work arrangements) • **Self-paced training** (If it is a MAS Value or MAS DNA Policy violation, mandatory self-paced training will be provided to the employee in question). • **Development plan** will be determined and developed by HR and HOD. • **A mentor** will be appointed for an agreed-upon period (6 to 9 months). If it is a behavioral issue, the mentor should be assigned by HR, and a formal sign-off from the mentor can be obtained by the DNA (Discipline & Accountability) team.
Low	• **Verbal Warning** - This shall be followed by an email summarizing the conversation. For TM a note is to be placed in their personal file stating that a verbal warning has been issued, along with a summary of the issue (This does not constitute a written warning). • **Cautionary Letter** • **Self-paced training** (If it is a MAS Value or MAS DNA Policy violation, mandatory self-paced training will be provided to the employee in question). • **A mentor** will be appointed for an agreed-upon period (6 to 9 months). If it is a behavioral issue, the mentor should be assigned by HR, and a formal sign-off from the mentor can be obtained by the DNA (Discipline & Accountability) team.

VII. RISK RATING

The table categorizes violations into four risk ratings:

1. Extreme
2. High
3. Medium
4. Low

VIII. CONSEQUENCE / ACTION

For each risk rating, the table specifies the consequences or actions to be taken:

1. Extreme (Red):

- **Actions:**
  - Immediate suspension of employment (with pay).
  - Show-cause letter and internal inquiry (in consultation with the EFC).
  - Immediate termination of employment (Employee placed on exit track).
  - Possible legal action based on facts and circumstances, in consultation with EFC.

2. High (Yellow)

- **Actions:**
  - Show-cause letter and internal inquiry (in consultation with EFC).
  - Employees may need to be transferred or separated from the organization.
  - Employee not considered for promotions for 2 years, and variable pay withheld during this period.
  - Discretionary payment such as increments and bonuses may be withheld for an agreed period.
  - Discontinuation of Company-Provided Benefits (Flexi work arrangements).
  - Self-paced training, development plan and/or mentorship based on the matter in concern.

3. Medium (Orange)

- **Actions:**
  - Show-cause letter and internal inquiry.
  - Written warning (filed in the employee's personal file).
  - Up to 20% of variable pay may be withheld.
  - Discretionary payment such as increments and bonuses may be withheld for an agreed period.
  - Discontinuation of Company-Provided Benefits (Flexi work arrangements).
  - Self-paced training, development plan and/or mentorship based on the matter in concern.

4. Low (Green)

- **Actions:**
  - Verbal warning [followed by an email/note summarizing the conversation].
  - Cautionary letter.
  - Self-paced training and/or mentorship based on the matter in concern.

IX. ESCALATION PROCESS

1. Matters to be Reported to the MCAP Board

a) **Matters above a financial threshold -** All cases over a financial threshold of USD250,000/-

b) **Matters where there is an establishment of a fraud committed** -
Above a financial threshold (USD250,000/-) and/or
Less than the financial threshold but fraud by a Manager or above employee and/or
Role of the employee considered sensitive (e.g. finance, procurement, HR, admin).

c) **A violation of the confidentiality policy or the IP policy -** All cases without any financial threshold, regardless of work level.

d) **Process Violations -** Identification of a gap in existing processes, fundamental to the running of the business, financial health of the organization or employee wellbeing, which needs to be adjusted/ corrected in multiple locations in the group.

e) **Reputational damage for MAS -** Any violation or incident that can result in severe reputational damage (e.g. reported in a public forum or publication, media attention, incidents related to customer, supplier, third party stakeholders or employees).

f) **Sexual harassment -** Committed by Manager & above employees where the accused has been found guilty or where accused of sexual harassment who resigned during or before the proceedings of a Domestic Inquiry. Any employee found guilty of severe sexual harassment (sexual bribery, use of authority to give/withhold favors) or sexual assault irrespective of the work level.

g) **Harassment / Bullying** of sever nature by any employee General Manager and above- use of harsh language, shouting, aggression – where issue is a repeat offence, and the matter affects the psychological safety of more than one member of the team. Even where it is not a repeat offence or if it only affects one person, if language and behavior can be considered severe and unsafe, such matter shall be reported. ***[To be determined by head of HR for the Value Stream/ Business Unit].***

2. Matters to be reported to the EXCO of the Relevant Company

a) **Matters above a financial threshold -** All cases over a financial threshold of USD200,000/-

b) **Matters where there is an establishment of a fraud committed -**
   a. Above a financial threshold (USD200,000/-) and/or
   b. Less than the financial threshold but fraud by a Manager or above employee and/or
   c. Role of the employee considered sensitive (e.g. finance, procurement, HR, admin)

c) **A violation of the confidentiality policy or the IP policy -** All cases without any financial threshold, regardless of work level.

d) **Reputational damage for MAS -** Any violation or incident that can result in severe reputational damage (e.g. reported in a public forum or publication, media attention, incidents related to customer, supplier, third party stakeholders or employees).

e) **Sexual harassment -** Committed by Assistant Manager & above employees where the accused has been found guilty or where accused of sexual harassment who resigned during or before the proceedings of a Domestic Inquiry. Any employee found guilty of severe sexual harassment (sexual bribery, use of authority to give/withhold favors) or sexual assault irrespective of the work level.

f) **Harassment / Bullying** of sever nature by any employee Assistant Manager and above - use of harsh language, shouting, aggression – where issue is a repeat offence, and the matter affects the psychological safety of more than one member of the team. Even where it is not a repeat offence or if it only affects one person, if language and behavior can be considered severe and unsafe, the matter shall be reported. ***[To be determined by head of HR for the Value Stream/ Business Unit].***

g) **Issues with regards to Leadership behavior / management style –** Grievances concerning management style, leadership behavior, reported formally by employees / where developmental discussions have been had / ongoing with the leader.

h) **Process Violations -** Violation of a process that affects the business of the company – where intentionally committed and where process correction is necessary.

7. CASE REPORTING

All cases of misconduct are meticulously analyzed and reviewed quarterly. The findings from these analyses are compiled into detailed reports, which are then submitted to the Audit Committee. The Audit Committee, in turn, reports these findings to the MAS Board, ensuring that the highest levels of the organization are informed about the instances and trends of misconduct.

Furthermore, quarterly updates are sent to each Value Stream/ Business Unit, providing them with insights into the nature and frequency of cases related to misconduct, the outcomes of investigations, and the effectiveness of the disciplinary actions taken. This process ensures continuous monitoring, transparency, and accountability across all levels of the organization, fostering a culture of compliance and integrity.

What are MAS's responsibilities towards you in upholding the Code?

1. Take Action against Non-Compliance

- Every concern reported will reach the relevant SBU, Value Stream and Group Code Officers, and / or DNA Centre of Expertise. These parties will ensure your concern is handled in an objective, impartial and transparent manner.
- Any act of non-compliance is a serious matter and will be dealt with based on the MAS Consequence Management Framework. The appropriate team will investigate every concern raised and will decide if the concern requires the triggering of the disciplinary procedure. After due investigation into a concern, where the investigation team establishes that an employee is found to have violated the Code and requires to proceed with the disciplinary procedure, he or she will be subjected to **disciplinary action, up to and including termination of employment and legal liability, wherever applicable.** The complainant will be notified of the closure of the concern.

2. Maintain Discretion

We maintain strict discretion with regard to all concerns raised. Confidentiality will be maintained, as far as it is possible for MAS to do so while investigating and resolving the issue raised, in compliance with the law.

3. Ensure Protection against Retaliation

It takes courage to report non-compliance, and it is the right thing to do. We encourage all to step forward and speak-up without the fear of retaliation. Anyone engaging in retaliation against anybody who has reported a concern, if identified, will be subjected to disciplinary action, up to and including termination of employment.

8. AN OVERVIEW OF OUR POLICIES

I. EQUAL OPPORTUNITY & ANTI-HARASSMENT POLICY

This policy affirms the company's commitment to providing a work environment free from discrimination and harassment. It ensures that all employees and job applicants receive fair and equitable treatment regardless of race, color, religion, sex, national origin, age, disability, or any other legally protected characteristic. The policy describes the nature of harassment as physical, verbal, visual & sexual harassment & describes types of sexual harassment including Quid Pro Quo. The policy also outlines procedures for reporting and addressing any incidents of harassment or discrimination, including bystander interventions, promoting a culture of respect and inclusion.

WHAT IS DISCRIMINATION

Discrimination involves treating a person unfairly or differently based on any of their distinguishing characteristics which are not related to the job, including but not limited to characteristics such as race, nationality, religion, gender, age, marital status, pregnancy, sexual orientation, physical appearance, disability, etc.

My colleague sought leave to attend a religious function. His manager did not approve it claiming the event was "not that important". What should I do?

MAS respects all religions equally. You have a right to obtain leave to attend a religious function. As long as it is planned proactively, the manager cannot deny granting of leave. Doing so would amount to discrimination based on religion. Express it politely to the respective manager. If it is a continuing practice, raise it with your HR Department or report it via the DNA Help Desk.

There is a job opening at my department which demands a lot of travelling. I think it is way too much for a girl. I am interviewing female candidates only as a courtesy. Haven't I made the right call?

MAS recruits the best talent based on merit, not on gender. Therefore, no, you cannot form such unsubstantiated assumptions on the acceptable limit of travelling for a girl. Ensure you interview candidates with an open mind. At MAS, equal opportunity means a fair chance for everyone.

WHAT DOES HARASSMENT MEAN?

Harassment includes any unwelcoming or different treatment of a person in the form of verbal, physical, visual or any other conduct, pertaining to distinguishing factors which are not related to the job, which would create an intimidating, abusive or a hostile work environment.

A colleague in my team always calls me "hot stuff." This makes me extremely uncomfortable. But my other colleagues say that he is just joking, and I should not take it seriously. What should I do?

Teasing based on appearance, which makes a person uncomfortable, is a form of harassment, which amounts to non-compliance of the Code. Address it directly with the colleague. You must state how it makes you uncomfortable and demand it be stopped. However, when not in a position to confront, or if the matter has been raised to no avail, report it via the DNA Help Desk.

My manager sounded harsh at my year end performance review, when she insisted that I need to change how I am approaching my current project. Does this amount to harassment?

A reasonable discussion at a performance review is done to facilitate progression. Your manager has a responsibility of providing you with open and honest feedback at a performance review. This does not amount to harassment as long as the feedback was constructive and your personal attributes, which are not related to the job, were not picked on.

A dignified working environment boosts productivity and morale. Ensure you support a culture with Zero – tolerance for harassment. You must:

- Stand up for yourself, in the event of being harassed. Demand the harasser to stop immediately.
- Understand and respect the personal boundaries which exist among people, especially when making remarks.
- Educate your colleagues on harassment and discourage them from behaving in a manner which amounts to harassment.
- Stand up for your colleagues in the event they are being harassed.
- Conduct yourself in a manner which promotes a harmonious and productive environment.

Fear of being harassed can hamper productivity and damage the integrity of employee's relationship with each other. Therefore, refrain from workplace harassment. Do not:

- Make unwelcoming, offensive, or degrading remarks to another person or group based on any distinguished characteristics.
- Engage in offensive verbal conduct such as bullying, threatening, insulting, joking, calling nicknames, taunting, or making inappropriate comments.
- Initiate offensive visual conduct such as demeaning emails and display or distribution of other offensive communications.
- Engage in violent or unfitting physical conduct such as physical intimidation, assault, or stalking.
- Make unwelcoming sexual advances such as inappropriate physical contact, obscene advances or comments and sexually colored digital communications.

II. CONFLICT OF INTEREST POLICY

This policy provides guidelines to help employees recognize, disclose, and manage any potential conflicts between their personal interests and the interests of the company. It aims to maintain integrity and trust in all business dealings by ensuring that decisions are made objectively and without undue influence. The policy includes examples of potential conflicts and steps for reporting and resolving such issues, fostering transparency and accountability. The policy provides a Standard Disclosure Form that shall be used to follow the three-step process of disclose, consent & protocol.

What is a conflict of interest?

A conflict of interest is a situation where our personal interests clash with the interests of MAS, resulting in an employee obtaining direct personal gain from company's transactions and/or unduly influence the employee's business judgments, decisions, or actions.

It is important to build and nurture relationships. Ensure you uphold utmost transparency and avoid conflicts of interest:

- Adopt the three-rule approach when you are facing a situation, which may lead to a conflict of interest:
  - **Disclosure:** Disclose the situation to your manager and ensure you fill the MAS Standard Disclosure Form
  - **Consent:** Obtain approval from your manager and HR
  - **Protocol:** Follow safety protocols to ensure transparency
- Act in the best interest of MAS; ensure your decisions are based on professional and not personal reasons.
- Follow appropriate procedures in vendor selection.
- Disclose any personal relationship with anybody at or connected to MAS that could influence your/ their role.
- Disclose any engagements/activities outside MAS that you are involved in that could conflict with your work at MAS.
- Follow appropriate procedures when dealing with the government and regulatory authorities.

Avoid the negative impact created by conflicts of interest. Ensure you do not:

- Attempt to apply any undue influence when dealing with third parties.
- Use your position at MAS for undue personal gain.
- Use MAS time, resources, or compromise on your job at MAS to advance your personal interests.
- Be involved in any other entity which has competing interests with MAS.
- Exchange gifts with or entertain service providers excessively.
- Influence others' political opinions.

Your department handles refreshments for office events. While gathering quotes, you notice your brother, who provides catering, has submitted one. Since you're in charge of vendor selection, would you step back from the decision?

Yes, I would step back from the decision-making process to avoid a conflict of interest. Since my brother is one of the vendors, my involvement could create a perception of bias. To ensure fairness and transparency, I would disclose the relationship to my line manager and HoD and allow an impartial party to handle the selection process.

You are helping a friend who has an IT equipment business. Your friend has now become a supplier of MAS.

I should not bring my friend's business as a supplier for MAS, without clearly disclosing my relationship and ensuring I stay away from any decision relating to selection, procurement, or contract approvals, related to my friend's business. To maintain transparency and fairness, I would disclose the relationship to the relevant authority and allow an independent party to oversee the procurement process. If I am in the same space of work as what I am advising my friend on [e.g.- I am a manager at TS], even if my friend doesn't supply to MAS, I must disclose my involvement in his business, because there could be a conflict with my work at MAS.

Peter is a manager, who is romantically interested in Zara, an executive reporting to his AM. He's considering asking her out for a drink to express his feelings. Should he go ahead?

No, Peter should not proceed with asking Zara out for a drink. Since Zara is an executive reporting to his Assistant Manager (AM), there is a power dynamic that could create a conflict of interest or lead to concerns about favoritism, bias, or an uncomfortable work environment. Workplace relationships, especially between different levels of hierarchy, can also raise ethical and professional concerns on sexual harassment. Peter should consider company policies on workplace relationships and, if necessary, seek guidance from HR before taking any action.

III. GIFT POLICY

This policy sets forth the rules and guidelines for accepting and giving gifts to avoid any appearance of impropriety or undue influence in business decisions. It defines what constitutes an acceptable gift and what might be considered inappropriate, ensuring that all employees act in the best interests of the company. The value limit of any gift /entertainment given shall be less than or equal to USD 50 and all gifts shall be recorded in the Gift & Entertainment Registry. The policy prohibits employees from accepting any gifts above 50 USD.

What would you do if you receive a gift more than $50?

Employees shall politely refuse any gifts from third parties, whether tangible or intangible, and emphasize the company's policies and procedures that prohibit accepting such gifts.

If an employee receives a gift from a third party that exceeds the USD 50 limit and cannot decline it, they must disclose it to their Head of Department. The gift should also be recorded in the Gift & Entertainment Register [which is maintained by the Code Officer, HR or HoD] and then surrendered to the Code Officer to ensure compliance with company policies and ethical standards.

IV. SOCIAL MEDIA POLICY

This policy outlines the appropriate use of social media by employees in both personal and professional contexts. It aims to protect the company's reputation and confidential information while encouraging respectful and responsible communication. The policy includes guidelines on what can and cannot be shared on social media, how to handle online interactions, and the potential consequences of policy violations.

V. CONFIDENTIALITY POLICY

This policy emphasizes the importance of protecting sensitive company information. It provides guidelines on how to handle, share, and store confidential information to prevent unauthorized access and disclosures. The policy covers various types of confidential information, including intellectual property, business strategies, and personal employee data, and sets out the obligations of employees to safeguard this information.

VI. INTELLECTUAL PROPERTY POLICY

This policy establishes the company's rights and responsibilities regarding the creation, use, and protection of intellectual property (IP). It includes guidelines on the ownership of IP created by employees, the use of third-party IP, and the procedures for reporting and addressing IP infringements. The policy aims to encourage innovation while ensuring that IP is managed in a way that protects the company's interests and complies with legal requirements.

VII. ELECTIONS AND ELECTIONEERING FOR PUBLIC OFFICE POLICY

This policy outlines guidelines for employees who are potential candidates as well as elected individuals of public office to ensure compliance with company values and policies. It includes guidelines for election candidates and those who wish to campaign for such candidates, guidelines related to employees elected to local bodies, presidential, parliamentary, and provincial councils under Election Law.

VIII. INFORMATION SYSTEM USAGE POLICY

This policy provides MAS employees and authorized third-parties, access to its information systems and IT services, based on the need and according to the least-privileges required to carry out their assigned duties and Responsibilities, in a secure, effective, and efficient manner. It also establishes a clear, reasonable, and fair standard for the acceptable usage of information systems and IT services provided by MAS to its employees and third-party users.

IX. LEAVE POLICY

The purpose of this policy is to establish a procedure that adheres to statutory requirements and set a company standard under which employees obtain their leave entitlement, whilst supporting the evolving trends of employees' lifestyles.

X. FLEXI POLICY

This policy is focused on supporting flexi-work arrangements, considering the needs and objectives of both the organization and the employee can be met, and the employee's deliverables are not disrupted in any form or manner. While not all positions will be amenable to flexi-work arrangements, consideration of flexi-work arrangements will be reviewed on a case-by-case basis, taking into account the nature and requirements of the role, employee's tenure, and performance.

XI. WHISTLEBLOWING POLICY

This policy encourages all stakeholders of MAS including employees and third parties who have a relationship with MAS to report any illegal, unethical or inappropriate behavior, practices, acts or omissions needing immediate attention, and is not limited to violation of MAS policies and values, while strengthening our commitment to uphold the highest standards of integrity and transparency.

Third parties can report such concerns via email to whistleblower@masholdings.com or via letter to Suren Fernando (Chief Executive Officer), Dinali Peiris (Director - Group Human Resources) or Surath Chandrasena (Director - Finance) at MAS Capital (Private) Limited - No.199, Kaduwela Road, Battaramulla, Sri Lanka.

