

ISO 9001:2015 Quality Management System qualified company
The UN Global Compact participant company



Code of Conduct

KMD Group of Companies has a Management Committee which consists of management executives, directors, senior managers, internal verifiers and occasional external consultants. This committee periodically plans, implements, reviews the policies & procedures; makes suggestions; amends necessary changes; reviews the changes; and re-plans, organizes, administers, and moderates all of them, in order to reflect the Company's missions, visions and procedures with the actual working business environment.

This **Code of Conduct** includes below policies:

1. Human Rights Policy
2. Labour Policy
3. Environmental Policy
4. Anti-Corruption Policy
5. Employment / Equal Opportunity Policy
6. Work/Sexual Harassment, Gender Discrimination Policy
7. Health & Safety Policy
8. Complaints Policy and Whistle Blowing Policy
9. Malpractice Policy

Required to comply with the code

All directors, senior management and employees are required to comply with this set of code of conduct.

Monitoring compliance

Any employee can feel free to report or complain to HR Management, Senior Management, and Top Management, if someone from KMD doesn't comply with this set of code of conduct, and it will be solved with case-by-case for seriousness of cases.

1. Human Rights Policy

KMD Group of Companies believes that all 30 Articles mentioned in the *Universal Declaration of Human Rights* are the common standard of achievement for all peoples and all nations. Common understanding of these rights and freedoms are the great importance for us.

Our Policies and Goals include:

1. To require our employees, business partners, suppliers, and our customers to understand, respect, support, and adhere to the principles of Universal Declaration of Human rights.
2. To address Human Rights risk, discover incidents of Human Rights abuse within the company and to act upon the Human Rights related issues.

30 Articles mentioned in the *Universal Declaration of Human Rights* are as below.

Article 1.

All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood.

Article 2.

Everyone is entitled to all the rights and freedoms set forth in this Declaration, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status. Furthermore, no distinction shall be made on the basis of the political, jurisdictional or international status of the country or territory to which a person belongs, whether it be independent, trust, non-self-governing or under any other limitation of sovereignty.

Article 3.

Everyone has the right to life, liberty and security of person.

Article 4.

No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms.

Article 5.

No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.

Article 6.

Everyone has the right to recognition everywhere as a person before the law.

Article 7.

All are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination.

Article 8.

Everyone has the right to an effective remedy by the competent national tribunals for acts violating the fundamental rights granted him by the constitution or by law.

Article 9.

No one shall be subjected to arbitrary arrest, detention or exile.

Article 10.

Everyone is entitled in full equality to a fair and public hearing by an independent and impartial tribunal, in the determination of his rights and obligations and of any criminal charge against him.

Article 11.

*(1) Everyone charged with a penal offence has the right to be presumed innocent until proved guilty according to law in a public trial at which he has had all the guarantees necessary for his defence.
(2) No one shall be held guilty of any penal offence on account of any act or omission which did not constitute a penal offence, under national or international law, at the time when it was committed. Nor shall a heavier penalty be imposed than the one that was applicable at the time the penal offence was committed.*

Article 12.

No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honour and reputation. Everyone has the right to the protection of the law against such interference or attacks.

Article 13.

*(1) Everyone has the right to freedom of movement and residence within the borders of each state.
(2) Everyone has the right to leave any country, including his own, and to return to his country.*

Article 14.

*(1) Everyone has the right to seek and to enjoy in other countries asylum from persecution.
(2) This right may not be invoked in the case of prosecutions genuinely arising from non-political crimes or from acts contrary to the purposes and principles of the United Nations.*

Article 15.

*(1) Everyone has the right to a nationality.
(2) No one shall be arbitrarily deprived of his nationality nor denied the right to change his nationality.*

Article 16.

*(1) Men and women of full age, without any limitation due to race, nationality or religion, have the right to marry and to found a family. They are entitled to equal rights as to marriage, during marriage and at its dissolution.
(2) Marriage shall be entered into only with the free and full consent of the intending spouses.
(3) The family is the natural and fundamental group unit of society and is entitled to protection by society and the State.*

Article 17.

*(1) Everyone has the right to own property alone as well as in association with others.
(2) No one shall be arbitrarily deprived of his property.*

Article 18.

Everyone has the right to freedom of thought, conscience and religion; this right includes freedom to change his religion or belief, and freedom, either alone or in community with others and in public or private, to manifest his religion or belief in teaching, practice, worship and observance.

Article 19.

Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.

Article 20.

*(1) Everyone has the right to freedom of peaceful assembly and association.
(2) No one may be compelled to belong to an association.*

Article 21.

- (1) Everyone has the right to take part in the government of his country, directly or through freely chosen representatives.*
- (2) Everyone has the right of equal access to public service in his country.*
- (3) The will of the people shall be the basis of the authority of government; this will shall be expressed in periodic and genuine elections which shall be by universal and equal suffrage and shall be held by secret vote or by equivalent free voting procedures.*

Article 22.

Everyone, as a member of society, has the right to social security and is entitled to realization, through national effort and international co-operation and in accordance with the organization and resources of each State, of the economic, social and cultural rights indispensable for his dignity and the free development of his personality.

Article 23.

- (1) Everyone has the right to work, to free choice of employment, to just and favourable conditions of work and to protection against unemployment.*
- (2) Everyone, without any discrimination, has the right to equal pay for equal work.*
- (3) Everyone who works has the right to just and favourable remuneration ensuring for himself and his family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection.*
- (4) Everyone has the right to form and to join trade unions for the protection of his interests.*

Article 24.

Everyone has the right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay.

Article 25.

- (1) Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control.*
- (2) Motherhood and childhood are entitled to special care and assistance. All children, whether born in or out of wedlock, shall enjoy the same social protection.*

Article 26.

- (1) Everyone has the right to education. Education shall be free, at least in the elementary and fundamental stages. Elementary education shall be compulsory. Technical and professional education shall be made generally available and higher education shall be equally accessible to all on the basis of merit.*
- (2) Education shall be directed to the full development of the human personality and to the strengthening of respect for human rights and fundamental freedoms. It shall promote understanding, tolerance and friendship among all nations, racial or religious groups, and shall further the activities of the United Nations for the maintenance of peace.*
- (3) Parents have a prior right to choose the kind of education that shall be given to their children.*

Article 27.

- (1) Everyone has the right freely to participate in the cultural life of the community, to enjoy the arts and to share in scientific advancement and its benefits.*
- (2) Everyone has the right to the protection of the moral and material interests resulting from any scientific, literary or artistic production of which he is the author.*

Article 28.

Everyone is entitled to a social and international order in which the rights and freedoms set forth in this Declaration can be fully realized.

Article 29.

- (1) Everyone has duties to the community in which alone the free and full development of his*

personality is possible.

(2) In the exercise of his rights and freedoms, everyone shall be subject only to such limitations as are determined by law solely for the purpose of securing due recognition and respect for the rights and freedoms of others and of meeting the just requirements of morality, public order and the general welfare in a democratic society.

(3) These rights and freedoms may in no case be exercised contrary to the purposes and principles of the United Nations.

Article 30.

Nothing in this Declaration may be interpreted as implying for any State, group or person any right to engage in any activity or to perform any act aimed at the destruction of any of the rights and freedoms set forth herein.

KMD also agrees and supports **The United Nations Global Compact's 2 principles on Human Rights.**

Principle 1:

Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2:

make sure that they are not complicit in human rights abuses.

2. Labour Policy

We KMD believe that UN Global Compact's 4 principles on Labour reflects the International Labour Organization's Fundamental Conventions, and the ILO Declaration on Fundamental Principles and Rights at Work, adopted in June 1998, highlights this set of core Labour principles endorsed by the international community. The Declaration covers 4 main areas.

Our Policy and Goals include:

1. To require our employees and our business partners to understand, to respect, to support, and to adhere to the 4 principles on Labour.
2. To monitor and resolve Labour-related risks within the company.
3. To periodically review and promote human resource development.
4. To periodically review and promote employee welfare policies, allowances, bonuses and employee benefits.

4 principles on Labour (The United Nations Global Compact)

Principle 3:

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4:

the elimination of all forms of forced and compulsory Labour;

Principle 5:

the effective abolition of child Labour; and

Principle 6:

the elimination of discrimination in respect of employment and occupation.

3. Environmental Policy

KMD Group of Companies recognizes the benefit, usefulness, and need of environmentally friendly technologies in 21st century. Being an IT education training company, and IT & Mobile products sales company, the nature of our operations makes us no direct significant environmental impact, or the bad impact on environment was relatively very small.

Our Policy guidelines include:

1. To maintain the environment clean & healthy, safety, and enjoyable.
2. To prevent accidents and cases of work-related ill health in working environment, and provide adequate control of health and safety risks arising from work activities.
3. To implement emergency procedures such as evacuation in case of fire or other significant incident at working environment.
4. To monitor safe and healthy working conditions.
5. To provide necessary training to ensure that employees are competent to do at their working environment.
6. To reduce energy usage, to use renewable energy and recycled paper, to implement efficient consumption of natural resources, and to protect the environment.

3 principles on Environment (The United Nations Global Compact)

Principle 7:

Businesses should support a precautionary approach to environmental challenges;

Principle 8:

undertake initiatives to promote greater environmental responsibility; and

Principle 9:

encourage the development and diffusion of environmentally friendly technologies.

4. Anti-Corruption Policy

We KMD believe that, from the ethical point of view, corruption is a violation of vital principles of social and economic life. For business companies, corruption can create unfair conditions for the trade and the finance. We welcome and appreciate the initiative effort of the United Nations Convention against Corruption (UNCAC) which came into force in December 2005.

KMD will not tolerate or in any way be involved in any form of corruption or bribery, including any kind of illegal payment offer or similar benefit to an administrative official in order to influence decision-making.

KMD will undertake that none of its employees or managers will offer, pay, promise, authorize or give anything of value to any employee or manager for purposes of obtaining or retaining favors or any improper advantages.

Within the company, KMD has below policies towards corruption, bribery and extortion:

1. Not to give and take any form of bribery among employees.
2. Not to give any form of bribery to KMD management levels.
3. Not to accept any form of bribery from customers, suppliers, and business partners.

4. To obey applicable local and regional legal laws.
5. To respect international legal frameworks against corruption.

Principle on Anti-Corruption (The United Nations Global Compact)

Principle 10:

Businesses should work against corruption in all its forms, including extortion and bribery.

5. Employment / Equal Opportunity Policy

KMD Group of Companies understands and supports that the equal opportunity policies are important for employment, and it brings the fairness among employees and diverse talents to the company.

The following policy guidelines were adopted.

- It is our commitment to a policy of equality of opportunity in all our employment practices, and to eliminating discrimination within the company whether on grounds of gender, marital status, race, color, national or ethnic origins, disability, age, sexual orientation, political associations or religion.
- We aim to promote practices and procedures which ensure equality of opportunity and to eliminate any practices which may unfairly discriminate directly or indirectly.
- All employees' recruitment data will be kept as evidence to reflect our equal opportunities policy.
- All our staff involved in recruitment, training, assessment and support will be aware of our equal opportunities policy and will actively implement this in meeting the needs of employees.
- All our resources that are relevant for employee's nature of work will be accessible for relevant employees.

6. Work/Sexual Harassment, Gender Discrimination Policy

KMD Group of Companies is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment, LGBTQ (lesbian, gay, bisexual, transgender, queer/questioning) discrimination. KMD Group of Companies will operate a zero tolerance policy for any form of work or sexual harassment, gender discrimination in the workplace, treat all incidents seriously and promptly investigate all allegations of these harassments. Any person found to have harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of these harassments will be taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint.

Anyone, including employees of KMD, clients/customers, suppliers, business partners, contractors, casual workers, or visitors who harasses another within KMD premises will be taken action in accordance with this internal policy.

All harassments are prohibited whether it takes place within KMD premises or outside, including at social events, business trips, training sessions or conferences sponsored by KMD Group of Companies.

The victim or any person can make either a formal complaint or an informal complaint to his/her superior.

The person who initially received the complaint will refer the matter to a senior human resources manager to initiate a formal investigation. The senior human resources manager may deal with the matter him/herself, refer the matter to an internal or external investigator or refer it to the Management Committee of KMD.

7. Health & Safety Policy

KMD always tries to provide its employees with a safe and healthy workplace, and ensure reasonable access to drinkable water and sanitary facilities, adequate lighting and ventilation and fire safety.

The following policy guidelines and procedures were adopted.

Policy guidelines:

- To prevent accidents and cases of work-related ill health and provide adequate control of health and safety risks arising from work activities
- To provide adequate training to ensure employees are competent to do their work
- To implement emergency procedures - evacuation in case of fire or other significant incident
- To maintain safe and healthy working conditions, provide and maintain equipment and machinery, and ensure safe storage / use of substances

Procedures:

- Health and safety notice poster is planned to display.
- First-aid box and accident book are planned to locate.
- All areas are well lit including dark area of stairs.
- Cleaner staffs keep work areas clear daily.
- Toilets are cleaned daily.

8. Complaints Policy and Whistle Blowing Policy

The following policy guidelines were adopted.

- KMD welcomes comments on the quality of its service and encourages those with concerns to raise them sooner rather than later, so that matters can be resolved at the earliest possible opportunity.
- If customers or employees are not satisfied with the way they have been treated, explain the problems to the member of staff with whom they are dealing. (Many complaints can be easily resolved at this stage without the need to make a formal complaint.)
- If their complaint has not been resolved informally, they can ask to speak to the next upper level (or) Manager and inform to make a formal complaint.
- If in doubt, Customer Service staff can advise customers to whom customer should address complaint. Complaint can be done by letter, telephone, email or in person.
- All complaints at this level will be dealt with within 2 working weeks.
- HR Management & Senior Management keep all these complaints as confidential, and treated it as only need to know basis for essential Management group, in order to protect an employee/person who complains or who reveals illegal/unethical behavior, from retaliation of other person.

9. Malpractice Policy

The following policy guidelines were adopted.

- In cases of suspected malpractice by employees, upper level Manager will make employees aware that their malpractice will be taken a disciplinary action if the case is proven.
- The member of employee who suspects any form of malpractice must inform the Head of Department / Manager about his/her findings in writing with supporting evidence.
- The investigation will be carried out by a task-force audit team which is independent of the management of normal working relationships with the malpractice happen, or external audit will be involved.
- The investigation team will carry out a full investigation of any allegations of malpractice and provide a comprehensive report to the relevant parties.
- In all cases where there is clear evidence of deliberate malpractice, the relevant parties will be informed.
- Disciplinary action will depend on how serious the malpractice appears to the investigators.

All these policies Code of Conduct are endorsed as of May 2020, and it is subject to regularly review by KMD Management Committee which consists of management executives, directors, senior managers, internal verifiers of the Company and occasional external consultants, and it may be revised periodically to reflect changes in the procedures, missions and visions of the Company.