



## SUDOERS SOLUTIONS SDN BHD

Sudoers Governance Policies

**Sudoers Solutions Sdn Bhd 1106346-H**

No B-18-1 Star Avenue Commercial Centre,  
Jalan Zuhal U5/178, Section U5,  
40150 Shah Alam, Selangor, Malaysia

## Code of Conduct

### 1. Purpose

This Code of Conduct defines the ethical standards and professional behaviour expected of all employees, contractors, and representatives of Sudoers Solutions Sdn Bhd Solutions Sdn Bhd. It supports our commitment to integrity, transparency, and responsible business practices.

### 2. Scope

This policy applies to all personnel acting on behalf of Sudoers Solutions Sdn Bhd, including full-time employees, part-time employees, interns, and third-party contractors.

### 3. Ethical Business Conduct

Personnel shall:

- Act honestly, fairly, and in good faith in all business dealings
- Avoid conduct that could damage the reputation or interests of Sudoers Solutions Sdn Bhd
- Comply with all applicable laws, regulations, and contractual obligations

### 4. Anti-Bribery and Anti-Corruption

Sudoers Solutions Sdn Bhd maintains a zero-tolerance approach to bribery and corruption.

- No employee shall offer, give, solicit, or accept bribes or improper inducements
- Gifts or hospitality must be reasonable, infrequent, and compliant with applicable laws
- Any suspected bribery or corruption must be reported immediately

### 5. Conflict of Interest

Personnel must avoid situations where personal interests conflict, or appear to conflict, with the interests of Sudoers Solutions Sdn Bhd.

- Any actual or potential conflict must be disclosed to management
- Decisions must be made in the best interest of the company

### 6. Confidentiality and Information Security

All non-public information, including client data and intellectual property, must be protected against unauthorised disclosure or misuse.

- Access to information shall be limited to authorised personnel
- Information security controls must be followed at all times

## 7. Compliance and Reporting

Breaches of this Code must be reported through the designated reporting or whistleblowing channel.

## 8. Disciplinary Action

Violations of this Code may result in disciplinary action, up to and including termination of employment or contract.

### ESG Policy

#### 1. Purpose

This ESG Policy outlines Sudoers Solutions Sdn Bhd' commitment to responsible environmental, social, and governance practices that are proportionate to the size and nature of our operations.

#### 2. Environmental Responsibility

Sudoers Solutions Sdn Bhd is committed to minimising environmental impact through: - Digital-first and paperless operations - Energy-efficient workplace practices - Responsible cloud infrastructure usage - Hybrid and remote work arrangements - Responsible management of IT assets and electronic waste

Environmental performance is reviewed periodically to identify improvement opportunities.

#### 3. Social Responsibility

Sudoers Solutions Sdn Bhd is committed to: - Fair and transparent employment practices - Equal opportunity and non-discrimination - Continuous professional development - Employee well-being and work-life balance - Positive community engagement through knowledge sharing and support initiatives

#### 4. Governance and Ethics

Strong governance supports trust and accountability. - Ethical conduct and compliance with applicable laws - Anti-bribery and corruption principles - Data protection and confidentiality - Defined roles, responsibilities, and decision-making processes - Mechanisms for reporting unethical or improper conduct

## 5. Monitoring and Review

This policy is reviewed periodically and updated as necessary to reflect business growth, regulatory changes, and stakeholder expectations.

### Personal Data Protection (PDPA) Policy

#### 1. Purpose

This policy establishes Sudoers Solutions Sdn Bhd' approach to protecting personal data in accordance with the Personal Data Protection Act 2010 (PDPA) of Malaysia.

#### 2. Scope

This policy applies to all personal data processed by Sudoers Solutions Sdn Bhd relating to employees, clients, partners, and other individuals.

#### 3. Data Protection Principles

Sudoers Solutions Sdn Bhd adheres to the following principles: - Personal data is processed lawfully and fairly - Data is collected for legitimate business purposes - Data is adequate, relevant, and not excessive - Data is accurate and kept up to date - Data is protected against unauthorised access, loss, or misuse

#### 4. Data Security

- Access to personal data is restricted to authorised personnel
- Appropriate technical and organisational security measures are implemented
- Incidents involving personal data must be reported promptly

#### 5. Data Retention

Personal data is retained only for as long as necessary to fulfil its intended purpose or to meet legal requirements.

#### 6. Data Subject Rights

Individuals may request access to or correction of their personal data in accordance with PDPA requirements.

## 7. Data Breach Management

Suspected or actual data breaches must be reported immediately to management for assessment and appropriate action.

## 8. Policy Review

This policy is reviewed periodically and updated to ensure continued compliance with PDPA requirements.

## Whistleblowing Policy

### 1. Purpose

This Whistleblowing Policy provides a mechanism for employees, contractors, and other stakeholders to report concerns regarding unethical, illegal, or improper conduct in a safe and confidential manner.

### 2. Scope

This policy applies to all personnel and third parties acting on behalf of Sudoers Solutions Sdn Bhd.

### 3. Reportable Concerns

Concerns that may be reported include, but are not limited to:

- Bribery, corruption, or fraud
- Breaches of laws or regulations
- Serious violations of company policies
- Data protection or information security breaches
- Abuse of authority or unethical behaviour

### 4. Reporting Channel

Reports may be made confidentially via:

- Email to designated management or compliance contact

All reports will be handled discreetly and investigated appropriately.

## 5. Protection Against Retaliation

Sudoers Solutions Sdn Bhd strictly prohibits retaliation against any individual who raises a concern in good faith.

## 6. Investigation and Outcome

Reported concerns will be assessed promptly. Appropriate corrective or disciplinary action will be taken where misconduct is substantiated.

## 7. Confidentiality

All information related to a whistleblowing report will be treated as confidential, subject to legal and regulatory requirements.

## 8. Policy Review

This policy is reviewed periodically to ensure continued effectiveness and alignment with regulatory and business requirements.