

MIMOS
code of
ethics





MIMOS code of ethics

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Message from President and CEO

World-class organizations are built on integrity which requires the consistent practice of the highest standards of ethical behavior. As MIMOS strives to take its place as a global player in research and development, it is therefore imperative that we have in place our own Code of Ethics for institutionalizing a culture of integrity.

The MIMOS Code of Ethics is premised upon upholding the SATRIA 1 value of Uncompromising Integrity by Mimosians in all situations. It sets out the guiding principles and standards of ethical behavior for Mimosians to follow in all their work relationships.

The underlying philosophy of the code is that there should be consistency in what we say and what we do. Our commitment to this “Say-Do” culture is to empower Mimosians to conduct themselves without fear or favour in accordance with the code. It is also the responsibility of everyone to report on violations of the code.

The effective implementation of the code is the responsibility of everyone in MIMOS. It is an integral part of what it means to be a Mimosian.



Dato' Abdul Wahab Abdullah

President & Chief Executive Officer

28 Sept 2006

1.0 Leadership Core Values

For achieving its declared vision of becoming a Premier Applied Research Centre in Frontier Technologies, MIMOS has unveiled a set of eight execution strategies called Strategic Advanced Technology Roadmap for Innovative Applications (SATRIAs).

Of the eight execution strategies, Leadership Core Values (SATRIA 1) is fundamental to the successful implementation of the remaining seven SATRIAs. This is because SATRIA 1 is about inculcating a set of leadership core values for changing the mindset and developing a foundation for unleashing the innovative potential of all Mimosians.

The Leadership Core Values of SATRIA 1 are:

- Uncompromising Integrity
- Envisioning Technology Leadership
- Shared Vision among Team Members
- Flawless Execution of Commitments
- Edge in Performance
- Innovation, Creativity and Productivity as a Culture
- Teaming as a Way of Life
- Accountability for All Actions

In upholding the Leadership Core Values, it is crucial that Mimosians display the right behaviours when confronted with different situations. In situations that have moral or ethical overtones, Mimosians will be guided by the MIMOS Code of Ethics.

2.0 Purpose of the MIMOS Code of Ethics

The MIMOS Code of Ethics (MCE) is a guide to help Mimosians live up to the noble value of Uncompromising Integrity as embodied in SATRIA 1. It elaborates in greater detail the ethical behaviours expected of Mimosians in complying with existing company policies and procedures. However, the MCE is neither a contract nor a comprehensive manual that covers every situation. It should not take away the individual responsibility for exercising good judgment and common sense.

3.0 Responsibility and Accountability

All Mimosians must abide by the principles and requirements contained in the MCE and should refer to it for guidance when acting on behalf of MIMOS. Failure to abide by the MCE will lead to disciplinary measures appropriate to the violation, up to and including dismissal.

4.0 Additional Responsibilities of Those Who Supervise Others

Those who supervise others have additional responsibilities under the MCE They must:

- Promote compliance and ethics by example – in other words, show by their behaviour what it means to act with integrity;
- Make sure that those who report to them understand the requirements of MCE and have the resources to meet them;
- Monitor compliance and ethics of the people they supervise;
- Use reasonable care to monitor and ensure that research and business partners who work with MIMOS act in a manner consistent with the MCE.
- Enforce the MCE consistently.
- Support employees who, in good faith, raise questions or concerns.

5.0

Asking Question and Raising Concerns

Mimosians are expected to report any breach or potential breach of the MCE that they are aware of. These breaches may relate to themselves, direct reports or others. Similarly, they must seek advice if they are ever unsure about the proper course of action. If they are in doubt about whether to speak up, they can ask the following simple questions to help them come to a decision.

- Is the action you are concerned about legal?
- Does it comply with the MCE?
- Does it expose MIMOS to any unacceptable risks?
- Does it match the commitments and guarantees that MIMOS has made to others?
- What would others think about this action – your supervisor, colleagues and family?
- How would this look if reported in the mass media?
- Does it feel right?

6.0

Seeking Help

Mimosians having questions or concerns pertaining to the application of the MCE, should ideally raise them with their line managers. However, in situations where this is not appropriate they may contact the Corporate Human Resource Division (CHRD) which has been mandated with the responsibility for facilitating the MCE Compliance Programme.

7.0 Our Responsibility as Mimosians

At MIMOS we seek to build a workplace that is safe and supportive of teamwork and trust. Everyone who works for MIMOS contributes to its success and making it into a premier organisation. Working together, drawing from our diverse talents and perspectives, we will stimulate new and creative opportunities for achieving our vision and mission.

We are committed to creating a work environment of mutual trust - in which diversity and inclusion are valued - and where everyone who works for MIMOS is treated with dignity and respect.

7.1 Constant Respect

We will treat each other with respect and fairness at all times, just as we wish to be treated ourselves. We will value the difference of diverse individuals from around the world. Employment decisions will be based on qualifications, talents and achievements, and will comply with national employment laws.

7.2 Harassment

Abusive, harassing or offensive conduct is unacceptable, whether verbal, physical or visual. Examples include derogatory comments based on racial or ethnic characteristics and unwelcome sexual advances. We are encouraged to speak out if a co-worker's conduct makes us uncomfortable and to report harassment if it occurs.

7.3 Safety and Health

We are all responsible for maintaining a safe workplace by following safety and health rules and practices in compliance with the Occupational Safety & Health Act 1994. We are responsible for immediately reporting accidents, injuries and unsafe equipment, practices or conditions to a supervisor or other designated persons. MIMOS is committed to keeping its workplaces free from hazards.

To protect the safety of all employees, each of us must report to work free from the influence of any substance that could prevent us from conducting work activities safely and effectively.

Threats or acts of violence or physical intimidation are prohibited.

7.4 Privacy and Employee Confidentiality

We are committed to respecting the privacy and confidentiality of personal data and information. It is our policy to acquire and retain only employee personal data that is required for the effective operations of MIMOS or which is required by law.

8.0 Our Responsibility to Partners

At MIMOS, we believe that research and business relationships founded on trust and mutual advantage – where both sides benefit – are vital to our success. To engender trust, we prefer to deal with partners who comply with MIMOS' integrity and ethical standards. We will strive to create mutual advantage by understanding the needs of our partners involving collaborative research institutions/centres, technology recipients, contractors, suppliers, joint ventures and alliances, and conducting ourselves honestly, responsibly and fairly.

8.1 Research Institutions/Centres

We will undertake collaborative research only with research institutions/centres that are willing to subscribe to our belief in research with quality and in accordance with accepted ethical standards.

8.2 Business Partners

We will not do business with others who are likely to harm our corporate image and reputation. For example, we will avoid doing business with others who intentionally and continually violate the law. All arrangements with third parties must comply with MIMOS' policies and the law. We will not use a third party to perform any act violating the MCE or prohibited by law.

8.3 Subcontractors

Subcontractors may play a vital role in fulfilling some of our contracts. It is therefore very important to ensure that our subcontractors preserve and strengthen MIMOS' reputation by acting consistently with the MCE.

8.4 Technology Recipients, Joint Ventures and Alliances

MIMOS strives to ally with companies that share our commitment to ethics. We will work to make the ethical standards of our technology recipients, joint ventures and alliances compatible with our own. We will select our partners impartially and objectively based on stated criteria and we will not intentionally mislead them whether in describing the features, capabilities and limitations of our technology or in other matters concerning our business relationship. We will also endeavor to ensure that our partners use MIMOS' technology for purposes that do not violate ethical standards. We will ensure at all times that our commercialization activities are in line with our mission statement. (Refer to Appendix I for the Commercialisation Code of Conduct.)

8.5 Working with Suppliers

Purchasing decisions must be made based solely on the best interests of MIMOS. Suppliers win MIMOS business based on product or service suitability, price, delivery and quality. Purchasing agreements should be documented and clearly identify the services or products to be provided, the basis for earning payment and the applicable rate or fee. The amount of payment must be commensurate with the services or products provided.

Our Responsibility to Stakeholders

We will endeavour at all times to meet the requirements of our stakeholders. We will also undertake to fulfill our commitments in the following areas:-

9.1 Compliance with the Law

We must comply with all applicable laws and regulations as we carry out our duties. Perceived pressures from supervisors or demands due to exigencies of work are no excuse for violating the law. When we have any question or concern about the legality of an action, we are responsible for checking with our line managers or with CHR.

9.2 Political Activities

Mimosians holding supervisory positions are not allowed to participate actively in political parties such as hold party positions. Any other form of involvement in political parties requires the written approval of the Integrity Ethical and Compliance Committees (IECC).

No Mimosian may make any political contribution on behalf of MIMOS or use MIMOS' name, funds, property, equipment or services for the support of political parties, initiatives, committees or candidates. This includes any other contribution of value.

9.3 Protecting/Misusing MIMOS Assets

We have a responsibility to protect MIMOS assets - physical and intellectual – from loss, damage, misuse or theft. MIMOS assets such as funds, products, facilities or equipment, may only be used for business purposes and other purposes approved by management. MIMOS assets may never be used for purposes that violate law or company policy.

9.4 Accuracy of Company Records

To make responsible decisions connected with our work, we require honest and accurate recording and reporting of information. This includes such data as quality, safety and personnel records, as well as all financial records.

All financial books, records and accounts must accurately reflect transactions and events and must conform both to required accounting principles and to MIMOS system of internal controls. No false or artificial entries may be made. When a payment is made, it can be used only for the purpose spelled out on the supporting document.

9.5 Recording and Retaining Business Communications

All work records and communications should be clear, truthful and accurate. Work records and communications often become public through litigation, government investigations and the media. We will avoid exaggeration, colorful language, guesswork, legal conclusions, and derogatory remarks or characterizations of people and companies. This applies to communications of all kinds, including emails and informal notes or memos. Records must be retained and destroyed according to MIMOS' record-retention policies.

9.6 Audits and Investigations

We will fully cooperate with all audits and investigations. We will also cooperate with reasonable requests for information from government agencies and regulators and consult with the Legal Department before responding to any non-routine requests. All information provided must be truthful and accurate. We will not conceal, alter or destroy documents or records in response to an investigation or other lawful request.

Our Responsibility to Communities

We will seek to engage in open and transparent dialogue and consultation with representatives of communities who have a legitimate interest in our operations.

10.1 Personal Community Activities

Mimosians are free to support community, charity and causes of their choice, as long as they make it clear that their views and actions are not those of MIMOS. Employees' outside activities must not interfere with job performance.

No Mimosian may pressure another colleague to express a view that is contrary to a personal belief, or to contribute to or support political, religious or charitable causes.

10.2 Environment

We respect the environment by complying with all applicable environmental laws. We are committed to protecting the environment by minimizing the environmental impact of our operations and operating in ways that foster sustainable use of the natural resources.

Mimosians must comply with MIMOS environmental policies and programmes. Management must be notified if hazardous materials come into contact with the environment or are improperly handled or discarded.

10.3 Communicating With External Audiences

We will provide fair, accurate, timely and easy to understand information to the public. To ensure professional and consistent handling, requests from the media should be forwarded to our corporate communication experts.

11.0

Conflicts of Interest

Organisational decisions and actions must be based on the best interests of MIMOS and must not be motivated by personal considerations or relationships. Relationships with prospective or existing suppliers, contractors, or regulators must not affect our independent and sound judgment on behalf of MIMOS.

General guidelines to help Mimosians better understand common situations that may cause a conflict of interest are listed below. However, Mimosians are required to use the MIMOS Conflict of Interest Disclosure Form to fully disclose their external business interest and directorship and where there is potential conflict of interest. The respective employee should state his/ her action plans in addressing the issue in the Conflict of Interest Management Plan, in accordance with policy. When in doubt, it is best to disclose. The information provided by the employees is subjected to management verification.

11.1 Outside Employment

Mimosians may not work for or receive payments for services from any other organisation without approval. Any outside activity must be strictly separated from MIMOS employment and should not harm job performance at MIMOS.

11.2 Honorarium

Mimosians are allowed to receive honorariums for lectures/speeches delivered or expert advice rendered in their capacity as experts in certain fields or as employees of MIMOS. All invitations for the services of Mimosians must be approved by the respective line managers. Honorarium received must be declared to the approving line manager. The amount that the employee is entitled to keep should not exceed RM2000 per event. Additional amounts above RM 2000 shall be divided equally between the employee and MIMOS.

11.3 Board Memberships

Serving on a board of directors or similar body for an outside company or government agency requires approval in accordance with policy. Helping the community by serving on boards of non-profit or community organisations is encouraged and does not require prior approval.

11.4 Family Members and Close Personal Relationships

We will not use personal influence to get MIMOS to do business with a company in which our family members or friends have an interest. We should disclose any close relationship that might make it appear we could favor another company to the detriment of MIMOS interests.

11.5 Investments

We will not allow our investments to influence, or appear to influence, our independent judgment on behalf of MIMOS. This could happen in many ways, but it is most likely to create the appearance of a conflict of interest if a Mimosian has an investment in a supplier or any other business partner and his decisions may have a business impact on this outside party. If there is any doubt about how an investment might be perceived, it should be disclosed to management.

We are also prohibited from directly or indirectly buying, or otherwise acquiring rights to any property or materials, when we know that MIMOS may be interested in pursuing such an opportunity and the information is not public.

11.6 Gifts

Gifts are not always physical objects. They also may be services, favours, loans or other items of value.

11.6.1 Gift To Mimosians

Mimosians do not accept kickbacks, commissions, lavish gifts or gratuities. We can accept items of nominal value but these have to be

declared to line managers who will advise on the appropriateness of retaining them or handing them over to CHR. Upon declaration of gift received through a 'Gift Declaration Form' (Refer to Appendix iii), the actual or approximate value shall be stated:-

Should the value be above RM200.00, the department of the recipient of gifts shall forward the gifts to Corporate Human Resource for disbursement to charity aid.

Should the value stated is below RM200.00; the gifts shall be dispersed within the department at the discretion of the department head.

We will not accept anything that might make it appear that our judgment for MIMOS would be compromised as a result. We may not accept special or reduced-rate personal loans as a result of our positions with MIMOS.

11.6.2 Gifts Given By MIMOS

Some business situations call for giving gifts. Gifts from MIMOS must be legal, reasonable and approved by management. We never pay bribes. We will not provide any gift if it is prohibited by law or the policy of the recipient's organisation.

11.7 Entertainment

11.7.1 Entertainment of Mimosians

We may accept entertainment that is reasonable, in the context of the business and that advances the company's interests. For example, accompanying a business associate to a business meal would be acceptable in most cases. However, entertainment that is prohibited by law or which involves gambling or consumption of alcohol is forbidden.

Entertainment that is lavish or frequent may appear to influence our independent judgment on behalf of MIMOS. If an invitation seems inappropriate, we must turn down the offer or pay the true value of the entertainment ourselves. Accepting entertainment that may appear inappropriate should be discussed with line managers, in advance if possible.

11.7.2 Entertainment by Mimos

We may provide entertainment that is reasonable in the context of the business. If we have a concern about whether providing entertainment is appropriate, we will discuss it with line managers in advance.

11.8 Travel

11.8.1 Acceptance of Travel Expenses

MIMOSians are allowed to accept travel expenses such as transportation and lodging from MIMOS suppliers provided that prior approval has been obtained from the respective line managers and the travel is work related. All such travel must also be accurately recorded in the travel expense records.

11.8.2 Provision of Travel Expenses

Unless prohibited by law or the policy of the recipient's organization, MIMOS may pay the transportation and lodging expenses incurred by others working with us, if for a legitimate business purpose and approved by management.

12.0

Conduct of Research

As a government-funded company entrusted with the task of spearheading applied research in information and communication technologies to meet national requirements, it is mandatory for all MIMOS researchers to carry out research with quality and in accordance with accepted ethical standards. A key aspect is the way we deal with proprietary information.

We will safeguard all proprietary information by marking information accordingly, keeping it secure, and limiting access to those who have a need to know to do their jobs. Proprietary information includes any information that is not generally known to the public and is helpful to MIMOS. It also includes proprietary information of our partners and others who have entrusted it to us. The obligation to preserve proprietary information continues until it becomes public domain knowledge.

13.0 MIMOS Code of Ethics Compliance Programme

Compliance to the MCE is the responsibility of each and every Mimosian. In addition, each MIMOSian has the additional responsibility to report any breach or potential breach of the MIMOS Code of Ethics. To safeguard and protect MIMOSians who undertake such reporting, MIMOS has come out with a Whistle Blowing Policy and Procedure.

Notwithstanding the above, the overall responsibility for implementing the MCE Compliance Programme is entrusted with CHR guided by IECC.

In promoting and facilitating the compliance of the MCE, the CHR will undertake the following activities:

- Oversee internal investigation processes before any case is brought to the Integrity Ethical Compliance Committee for decision on appropriate disciplinary action.
- Propose revisions to the MCE periodically based on suggestions/feedback from Mimosians.
- Assess compliance risks and ensure that internal controls are responsive to these risks.
- Provide support to help Mimosians comply with the MCE.
- Provide and oversee compliance training and communication.
- Regularly update the IECC on compliance performance of MCE.

14.0 Reference

- 1) Communication & Coordination Guideline and Procedure
- 2) Whistle Blowing Policy and Procedure

My Key Responsibilities

As An Employee I shall:

1. Treat everyone in MIMOS with fairness, dignity and respect.
2. Report immediately accidents, injuries, unsafe equipment and practices.

Towards safeguarding the interests of Stakeholders I shall:

3. Comply with all statutory laws and MIMOS rules, regulations and procedures.
4. Not get involved with any political parties, unless with the written approval of the Integrity and Ethical Compliance Committee (IECC).
5. Protect MIMOS assets – physical and intellectual – from loss, damage, theft and misuse.
6. Ensure that all my work records and communications are accurate and truthful.
7. Cooperate fully with all authorized audits and investigations.

Towards safeguarding the interests of Communities I shall:

8. Ensure that whenever I participate in personal community activities my actions and views are not perceived as those of MIMOS.
9. Comply with MIMOS environmental policies and programmes.

In managing any Conflicts of Interest I shall:

10. Submit MIMOS Conflict of Interest Disclosure Form annually and re-submit whenever a new conflict of interest situation arises that has not been declared.
11. Not work for or receive payments for services from any other organization without approval.

12. Declare all honorariums received and where the honorarium is in excess of RM2000, to divide the excess equally between me and MIMOS.
13. Seek approval from management to serve on a board of directors or similar body for an outside company or government agency.
14. Declare to my line manager all gifts received and channel them to Corporate Human Resources for appropriate distribution.
15. Accept only entertainment that is reasonable, in the context of the business and that advances the interests of MIMOS.
16. Seek approval in advance from my line manager for any work related travel and lodging expenses provided by a MIMOS supplier.

In the Conduct of Research I shall:

17. Undertake it with the highest quality and in accordance with accepted ethical standards

In dealing with partners I shall:

18. Select them impartially and objectively guided by established criteria including compliance with MIMOS' ethical standards and I shall work towards building trust and mutual advantage with such partners.
19. Conduct myself responsibly, honestly and fairly and endeavor to ensure that the use of our technology does not violate ethical standards.

To ensure compliance with the MIMOS Code of Ethics I shall:

20. Report any breach or potential breach of the MCE in line with the Whistleblowing Policy and Procedure.

Commercialisation Code of Conduct

Engaging with partners and stakeholders during the commercialisation process creates the potential for violating integrity resulting in unethical behaviour. This code of conduct is intended to safeguard against such breaches.

1. Our commercialisation activities shall be in line with our mission of growing globally competitive indigenous industries.
2. Any market sensitive information of our Technology recipients, Technology partners and End Users shall be safeguarded and shall not be used to negatively impact them.
3. Our selection process for potential Technology recipients, Technology partners and End Users shall be implemented in an impartial and objective manner and in accordance with stated criteria.
4. In dealing with our potential Technology recipients, Technology partners and End Users we shall be transparent and open as to the capabilities, limitations and competitiveness of our technologies.
5. Our communication with potential Technology recipients, Technology partners and End Users with regard to future business prospects shall be honest and non- speculative vis-à-vis their involvement in projects secured by MIMOS, within the limits of the confidential obligations imposed.
6. We shall represent only MIMOS's interests and technologies when dealing with potential Technology recipients, Technology partners and End Users.
7. When assessing technologies on behalf of a third party we shall declare our interests and excuse ourselves from the decision making process in the event our Technology recipients' or MIMOS's technologies are being assessed.



GIFT DECLARATION FORM

TO BE FILLED BY OFFICER RECEIVING GIFT:

GIFTS RECEIVED				
Date Gift received	Description of Gift	Value of Gift	Gift Given By	Reasons for Receiving Gift

Name:..... Signature:

Position:..... Div/Dept:..... Date:/...../.....

TO BE FILLED BY LINE MANAGER:

Justification and Recommendation:

.....

Name:..... Signature:

Position:..... Div/Dept:..... Date:/...../.....

Upon completion forward to the CHR for processing.

TO BE FILLED BY VICE PRESIDENT/ DIRECTOR/ SENIOR MANAGER OF CHR:

If the value is above RM200.00, the gifts will be disbursement to charity aid.

Name of the Charity Home: Signature:

Position..... Date:/...../.....



Innovation for Life™