

Purpose and Scope

The purpose of this policy, applicable to Ultradata employees in Malaysia, is to:

- Set out the framework under which Ultradata may agree to flexible (“hybrid”) working arrangements for employees in the KL office;
- Ensure that employees approved to participate in hybrid working arrangements are aware of their responsibilities to ensure a safe work environment, if at home, that replicates the office environment in terms of work health and safety; and
- Ensure that employees maintain the confidentiality of Confidential Information (refer definition below) when working both from the office, and from home, where that requirement may equally apply.

Definitions

“Hybrid Working Arrangements” and related references means work and agreed working arrangements involving a combination of work at an Ultradata office, and work performed at an employee’s specified residential address, for an agreed number of days, during ordinary hours of work.

“Confidential Information” includes all data and information relating to the business and management of Ultradata, including but not limited to, proprietary and trade secret technology, accounting records to which access may be obtained by the employee, detail of computer software, business operations, marketing and development operations, passwords and client information.

Principles

In framing this policy for Malaysian employees, Ultradata has been guided and influenced by the following:

- Ultradata firmly believes that the process of staff working together in an office environment is more effective for collaborating, problem solving, innovating and developing solutions than in a virtual environment. Working together in an office environment, for the majority of staff, has been a cornerstone of the Ultradata culture and a key factor in the success that Ultradata has enjoyed over its history;

- Notwithstanding the above, Ultradata acknowledges that the employment landscape has changed, particularly as a consequence of the Covid-19 pandemic, and that there may be times when, for individuals, and the company, hybrid working arrangements may, temporarily, or on a more regular basis, be an effective way to facilitate an optimal level of engagement and productivity;
- Ultradata will review all requests for hybrid work arrangements from the perspective of the performance and productivity of the individual and the team concerned. Requests will only be approved where it can be demonstrated there will be no reduction in performance and productivity from the level attained in the office. Ideally, a higher level of performance and productivity can be attained by agreed arrangements. Noting the above, Ultradata will regularly review all agreed hybrid work arrangements. Arrangements will be amended or rescinded, with reasonable notice by Ultradata, where they are not providing at least commensurate levels of performance and productivity;
- Working from home is not a standard or contractual entitlement. Further, there are certain roles within Ultradata's organisational structure that cannot be undertaken in a home environment, in a standard 'business as usual' period.

Recognising the above principles, this policy provides a general summary of Ultradata's policy on hybrid working arrangements and the conditions under which Ultradata Malaysia may use its discretion to grant requests for hybrid working arrangements. Nothing in this policy is intended to give rise to any contractual rights or obligations beyond those provided for in the employee's employment contract.

Work Health and Safety Obligations

Where Ultradata enters into a Hybrid Work Agreement it has a duty to ensure that employees are not exposed unnecessarily to risks to health and safety in their place of work, so far as is reasonably practicable.

In order for Ultradata to meet these commitments, it is important, therefore, that:

- Any home-based work site is a safe area of work;
- Systems of work undertaken in any home-based work sites are safe;
- Employees working from home are provided with appropriate information to enable them to perform their work safely; and,

- All incidents are investigated and hazards adequately controlled, reduced or eliminated.

Confidential Information

Ultradata and its employees have obligations to Ultradata's clients to maintain the confidentiality of confidential information belonging to Ultradata and its clients (**Confidential Information**). The granting, by Ultradata, of any hybrid working arrangements under this policy, will be subject to the same confidentiality conditions that apply to employees working permanently from the office. Further, given the absolute criticality of this matter:

- Ultradata reserves the right to audit the confidentiality compliance of those staff who enter into a Hybrid Work Agreement, including, if necessary, reviewing the physical working from home environment;
- Ultradata requires employees who are unable to dispose of hard copy confidential information at home, using a shredder, to bring those documents to the office and use the company shredders or security bins (if available) to dispose of those documents securely;
- Where it is discovered that these requirements are not being satisfied, whether or not such a breach results in a serious incident, Ultradata may immediately withdraw the Hybrid Work Agreement.

Further information regarding Ultradata's information security requirements can be found in the following policy documents:

- Information Technology Acceptable Usage Policy;
- Information Security Risk Management Policy;
- Data Breach Protection Policy;

available to all staff under 'Policies and Procedures' on the Ultradata company intranet.

The Policy

In framing this policy, Ultradata's default position is that it requires employees to work from the office.

However, from time to time, and at the request of an employee, Ultradata may agree to enter into a Hybrid Work Agreement with an employee who seeks formal approval. A Hybrid Work Agreement, involving agreed 'hybrid working arrangements' is a mutual agreement between an individual employee and Ultradata. Requests to enter into a Hybrid Work Agreement will be considered on an individual basis, taking into consideration the nature of the employee's role and responsibilities and the day to day business needs of Ultradata.

The key considerations will be suitability of the work for a hybrid working arrangement, operational requirements, security, cost effectiveness, health and safety, and the circumstances of the employee.

Factors that Ultradata may consider in determining whether or not to grant a request for a discretionary hybrid working arrangement include:

- the employee's personal circumstances;
- the nature of the employee's role;
- whether or not the employee has successfully progressed through their probation period;
- the cost and practicality of the requested arrangements;
- the effect of accommodating the request, on the workplace, and Ultradata's business;
- whether the working arrangements of other employees need to be changed to accommodate the request;
- whether it is necessary to recruit new employees to accommodate the request;
- the degree to which the requested arrangements could result in a significant financial loss, or negatively impact performance, efficiency or productivity; or have a significant negative impact on client service.

Employees applying to enter into a Hybrid Working Agreement will be asked to respond to a number of questions designed to capture as much of the above information as possible.

In the event that Ultradata consents to a request for a hybrid working arrangement, the agreed arrangements will be subject to the following:

- Ultradata will consider hybrid working arrangements where the majority of the employee's working time is spent in the office; that is, with a working from home component of no greater than two days each week (for full-time employees) or a pro-

rata equivalent period (for part-time employees). In the case of part-time employees, a minimum of 60% of time must be spent in the office. All days in the office must be full days;

- Unless otherwise agreed, the specific days where all employees will be required in the office will be Tuesday, Wednesday and Thursday of each week. If an agreed working from home day falls on a public holiday, it cannot be transferred to another day in the week;
- The grant of such a request will be on a four-month trial basis; with the ability to continue the arrangement following a review process;
- The employee must continue to adhere to Ultradata's policies and procedures;
- The employee must be contactable by their manager and other staff members during the agreed working hours in which home-based work is carried out;
- The agreed working hours of the employee remain the same as those they would have completed in the office. Working hours are to be agreed between the employee and their manager and must adhere to the standard hours policy. All hours must be accurately recorded as per standard time-sheeting practice;
- The employee's home ('nominated working from home address') is regarded as the employee's place of work during the days and hours that it is agreed the employee may work from home;
- Employees, should they occupy a property with non-Ultradata employees (other than members of their immediate family) will need to ensure that their working from home environment is conducive to uninterrupted work and sufficiently private to comply with information confidentiality requirements;
- The terms and conditions of the employment between the employee and the employer that apply whilst working in the office also apply at the home-based work site;
- The employee will take all reasonable precautions to secure Ultradata's property and Confidential Information, whilst at the office, and whilst working at home;
- Other than a laptop or desktop computer provided to the employee by Ultradata, the employee, whilst working in a home-based environment, under the terms of a Hybrid Work Agreement, must provide and fund their own other 'tools of trade' including, but not limited to, reliable internet access, printer and mobile phone;
- The employee must return to Ultradata any of its property immediately upon demand, where circumstances warrant such action;

- The employee must permit Ultradata reasonable access to the residence to inspect the suitability of the residence and/or to enable Ultradata to recover any of its property, if circumstances warrant such action;
- The manager will ensure regular opportunities for communication between themselves and the employee and take all reasonable steps to provide to the employee the same information concerning staff meetings, training and other career development opportunities that is available to other employees;
- The grant of a request to participate in hybrid work arrangements (or any decision to allow the arrangement to continue beyond any trial period/s) will not give rise to any contractual rights or entitlements; and may be withdrawn at any time in Ultradata's sole discretion (though Ultradata will not exercise that discretion unreasonably);
- Should Ultradata withdraw an employee's ability to participate in a hybrid working arrangement, it will provide to the employee a two-week period of notice, unless otherwise agreed;
- Any grant of a request for a hybrid working arrangement will be subject to any other such conditions and requirements as Ultradata may introduce from time to time, including requiring the employee to do all things needed for Ultradata to satisfy itself that the home work environment is safe and suitable for the employee to work from home;
- With relation to the above, all applications must be accompanied by a completed and approved Safety Risk Assessment Form (also refer further information below) including outline of emergency evacuation procedure ("egress") and photographic evidence of appropriate first aid and fire extinguisher;
- Will not adversely affect the employee's ability to perform their role, the duties and responsibilities of which are suitable for a component of working from home;
- Will not impede Ultradata's ability to perform day to day business operations;
- Do not contravene any local or national Malaysian laws, rules or regulations, which will always prevail over provisions of Ultradata policy;
- Do not put the employee at risk of injury;
- Suitable equipment is available for use by either Ultradata or the employee – though approval for a requested Hybrid Work arrangement will not guarantee the issue of new IT equipment by the Company;
- All requests, evidence and assessments are produced and any requested improvements or reasonable adjustments to the designated workspace are completed.

Requesting Approval to Enter into a Hybrid Work Agreement

Prior to entering into a Hybrid Work Agreement, the employee should first discuss with their manager their reasons for seeking to participate in hybrid working arrangements. Following this, the employee should complete, and submit to their manager, the **Hybrid Working Agreement Request Form for Malaysian Staff**.

For clarity, it will be expected that the employee will be working in the office until such time as any requested hybrid working arrangement is approved.

Hybrid Working Agreement Request Form.

The Hybrid Working Agreement Request Form shall include:

- Reasons for the request – referencing the factors that Ultradata may consider in determining whether or not to grant a request for a discretionary hybrid working arrangement;
- A completed Working from Home Safety Risk Assessment, including photos of the proposed designated home workspace;
- A copy of the emergency evacuation procedure which is displayed in the designated workspace;
- Evidence of appropriate first aid and fire equipment, suitable for the designated workspace.

On review of the information, Ultradata may request reasonable adjustments to be made to the workspace where a potential risk or hazard is identified. The employee must consult their manager and action any request for reasonable adjustments to the proposed workspace.

Where the employee does not meet the above requirements, Ultradata may decline or suspend an agreement or request for a hybrid work arrangement.

When agreement in principle is reached, a written and signed Hybrid Work Agreement will be entered into. The agreement may be terminated by either party with a minimum of two weeks' notice (or shorter period, if agreed).

Changes to Hybrid Working Arrangements

Hybrid work arrangements will be reviewed and assessed periodically or when circumstances dictate. Employees who are approved for such arrangements must ensure that the workspace does not significantly change from the photo evidence supplied on approval.

Approval is Granted for a Specific Residential Address

Approval for Hybrid Work Arrangements will be granted noting the specific residential address that a working from home component applies to. Approved designated workspaces are located at the specific residential address.

Therefore, if the employee changes residential addresses, either temporarily or permanently, during the period of a Hybrid Working Agreement they must notify and obtain approval from their manager to continue to work under the Hybrid Work Agreement. Where they are temporarily relocating (for a period of no greater than one week) specific approval to work at the alternative location must be obtained from the relevant member of the Leadership Team. Where the relocation is for a longer period, or where the employee is changing residential address, a new Request Form must be submitted, including the Safety Risk Assessment applicable to the new designated workspace.

In these circumstances, the employee must satisfy Ultradata that their new working location (at the new residential address) meets the same work health and safety standards as the residential home location that was previously and initially approved.

Information regarding any significant changes to the designated workspace in the approved residential location must be provided to the employee's manager, and People & Culture.

Employees Displaced by Natural Disasters or other Unforeseen Circumstances

Where employees due to natural disasters or other unforeseen circumstances need to temporarily relocate, or undertake work that may otherwise have been performed at home from alternative locations, other than the office, they must immediately advise their manager and seek agreement to work from a new and temporary location.

These circumstances will be considered on a case by case basis, and Ultradata will do all that it can to support employees confronting such circumstances. In deciding how best to manage the situation, Ultradata will need to ensure that all IT security requirements can be adequately satisfied under the new, temporary arrangement. Where such security requirements cannot be satisfied, Ultradata may require the employee to work from the office where the office can be reasonably attended.

Infrequent or 'One-Off' Work from Home Arrangements

Employees who, due to specific 'one-off' personal circumstances, including emergency circumstances, need to work from home for a short period, on an ad-hoc or intermittent basis, for a period of no longer than two days, will not be required to submit a Hybrid Work Arrangement Request Form. They must however, speak with their immediate manager about the circumstances at hand and agree that working from home over the short period will be the best way to manage the situation. In some cases, the manager may form the view that carer's leave, or another form of leave, may be more appropriate. Where it is agreed that working from home is the best way to manage the situation, all of the working from home obligations in this policy will apply.

Approval for infrequent, or one-off requests to work from home for a short period, will be at the discretion of Ultradata, and considered on a case by case basis. In assessing such requests, Ultradata will also assess the frequency of such requests.

Breaches of Policy

Where an employee becomes aware that their arrangements potentially breach the Ultradata requirements, they should advise/ 'self-report' to their manager immediately. Should an employee be found to be in breach of Ultradata's policies and procedures, or fail to comply with the requirements of this Hybrid Work Policy, appropriate management action will be taken that may include temporary or permanent suspension of hybrid working arrangements.

Other

Employees should seek advice regarding taxation issues and domestic insurance arrangements. Employees who live in rental accommodation should ensure that home based working arrangements are permissible under their lease agreement.

Approval Protocols & Steps in the Process.

1. All requests for Hybrid Working arrangements are to be discussed by the employee, first, with their immediate manager.
2. During the course of the initial discussion with the immediate manager, the employee and manager should agree on the process by which they will seek and secure the People and Culture approval to the Health and Safety requirements.
3. The People & Culture approval should be secured before the Request Form is provided by the manager, to the Leadership Team member/s.
4. After the employee has completed and submitted their Request Form to their immediate manager, the manager should then forward the completed Request, with an appropriate recommendation, to the applicable Leadership Team member/s, for review.
5. The Leadership Team member/s must then provide a formal recommendation to, and for the consideration of, the CEO.
6. For a request to be approved it must be approved by the CEO.

Post Approval

Once approved by the CEO, a period of at least two weeks will need to pass prior to the commencement of the agreed arrangement.

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