



**MyTech Group Berhad
(formerly known as Widetech (Malaysia) Berhad)**

Anti-Bribery and Anti-Corruption Policy

I. Introduction

MyTech Group Berhad (formerly known as Widetech (Malaysia) Berhad) (“the Company” or “MyTech”) has established an anti-bribery and anti-corruption programme and enforced a strict zero-tolerance approach to all forms of bribery and corruption. The Company ensures that its operations will be carried out in a fair and ethical manner and is fully committed to the compliance of applicable rules and regulations, including the Malaysian Anti-Corruption Commission Act 2009, the Penal Code and all other laws pertaining to anti-bribery and corruption practices. For further clarity, this Policy should be read together with MyTech’s other policies and procedures.

II. Scope

This Policy applies to all individuals working at all levels within the Company. This includes but not limited to: Directors, employees (permanent, part-time, contract or temporary) and business associates of Widetech.

III. Definitions

‘Bribery’ refers to the act of soliciting, giving, providing, offering and promising gratification, directly or indirectly, to a person in authority either in the form of money, services or valuable goods as an inducement or reward to or not to do an act in relation to the person’s principal affairs.

‘Corruption’ is the act of giving and/ or receiving of any gratification or reward in the form of cash or in-kind of high value for performing a task in relation to his/ her job description.

‘Business Associate’ refers to any individual or organisation that the Company comes into dealing with during the course of its business, including actual and potential customer, supplier, vendor, distributor, agent, advisor, consultant, subcontractor and joint venture partner.

'Gift and Hospitality' refers to any form of monetary or non-monetary offering that includes, but not limited to, cash money, redeemable vouchers, travelling trips, meal and drinks, entertainment expenses that are given to or received by the Company's Directors, employees, or business associates.

'Facilitation Payment' refers to an unofficial payment made to any individual or organisation in power to secure or expedite the performance of a routine or administrative duty.

IV. Gifts and Hospitality

The Company recognises that the exchange of gift and hospitality may be customary in maintaining goodwill and reinforcing business relationships. The Company asserts that all gifts and hospitality given or received shall: -

- i. Be Infrequent;
- ii. Not infringe existing laws and regulations;
- iii. Be subject to due diligence review by the Company;
- iv. Not be made or received to attain unjustifiable benefit such as to obtain or retain business;
and
- v. Observe the maximum limits prescribed below: -

	Maximum Limit (RM)
Gifts	500
Meals	500
Entertainment and Travel	500

V. Facilitation Payments

The Company does not endorse the making and participation of facilitation payment. The Company's directors, employees and business associates are expected to refrain from making, receiving, accepting and allowing any forms of practices which can be construed as a facilitation payment. Any event or activity which may result in facilitation payment being made or received shall be avoided.

VI. Political Donations

The Company does not endorse any donation made to political party. Although the Company's Directors and employees are not restricted to making any political donations in their personal capacity, it shall not be used as a means to facilitate or conceal any act of bribery and corruption.

No donation or contribution should be made in a manner which is in violation of existing laws and regulations. If an employee is found to be in violation, disciplinary action up to termination of employment may be enforced.

VII. Charitable Donations

The Company allows for charitable donations and sponsorships. Charitable donation made in good faith, monetary or otherwise, is acceptable by the Company.

However, no donation or contribution should be made in a manner which is in violation of existing laws and regulations.

VIII. Record Keeping

It is the Company's practice to ensure that all accounts, records and documents for payments made to business associates, and other third parties, are prepared accurately and completely. Off-the-book transaction to conceal improper payments is strictly prohibited.

For gifts and hospitality offered to or accepted by Directors and employees, the reasons of transactions have to be specifically recorded and approval being evidenced.

IX. Non-Compliance

Non-compliance with this Policy may result in disciplinary actions, including immediate termination of appointment or employment, to be taken against the offending Director or employee. The Company will enforce a termination of contract with its business associate if it is found to be involved in bribery and corruption. Further legal action may be taken against the offending parties if the Company's reputation and interest has been impacted as a result of violation of this Policy.

MyTech encourages any individual with concern, suspicion or evidence of bribery and corruption acts committed by Director, employee and business associate to raise a report in accordance with the procedures outlined in the Whistleblowing Policy available on the Company's website.

X. Review

MyTech shall conduct periodic audits to ascertain the compliance of this Policy. Such audits may be administered by the Company's internal audit department or by third-party consultants.

This Policy shall be reviewed periodically by the Company to assess the effectiveness, and in any event, at least once every 3 years. Such amendments to this Policy may occur in the efforts to ensure compliance with applicable laws and regulations, or to accurately reflect organisational changes and practices.