



MYTECH (MALAYSIA) BERHAD
(formerly known as Widetech (Malaysia) Berhad)
[Company No: 198401001418 (113939-U)]

CODE OF CONDUCT AND ETHICS

A. PRINCIPLE

The principle of this Code of Conduct and Ethics ("COCE") is to uphold sincerity, integrity, responsibility and corporate social responsibility.

MyTech Group Berhad (formerly known as Widetech (Malaysia) Berhad) ("MyTech" or "Company") and its subsidiary companies ("MyTech Group") will strictly abide to the principles of honesty, impartial and fairness with legal and moral standards. All Directors, management and employees of MyTech Group will comply with all national, provincial and local laws, ordinances, regulations of their localities, high ethical standards as well as this COCE.

B. PURPOSE

The Board establishes this COCE for MyTech and MyTech Group together with management implements its policies and procedures, which include managing conflicts of interest, preventing the abuse of power, corruption, insider trading and money laundering.

This COCE is formulated to enhance the standard of corporate governance and corporate behaviour.

The policies of the Code of Conduct and Ethics should be integrated into company-wide management practices.

This COCE of MyTech aims to provide articulate acceptable practices and guidance to the Board, management and employees :-

1. handle actual or potential conflict of interest;
2. prevent corrupt practices which include the offering and acceptance of gifts and other form of benefits;
3. encourage the reporting of unlawful or unethical behaviour;
4. protect and ensure the proper use of the company's assets;
5. ensure compliance with laws, rules and regulations;
6. to act within the authority conferred upon them in the best interests of the Company;
7. act in the best interest of, and fulfil their fiduciary obligations to the Company and its shareholders;
8. deal with customers, suppliers, related parties and stakeholders of MyTech Group's business with integrity;
9. uphold the spirit of responsibility and social responsibility in line with the legislation, regulations and guidelines for administrating a company;
10. enhance the standards of honesty, integrity, ethical and law-abiding behaviour expected of Directors, management and employees;
11. promote good business conduct and maintaining a healthy corporate culture that engenders transparency and fairness.

MyTech Group strictly prohibits:-

1. any suspicious or illegal intelligence gathering, in order to protect the reputation of MyTech Group;
2. occurrence of any unethical business behavior;
3. bribery, giving or acceptance of ill-gotten monies.

C. CODE OF CONDUCT AND ETHICS

(I) All Directors should at all times observe the following codes:

- Ensure at all times that the Company is properly managed and effectively controlled;
- To stay abreast of the affairs of the Company and be kept informed of the Company's compliance with the relevant legislation and contractual requirements;
- Limit his directorship of companies to a number in which he can best devote his time and effectiveness;
- At all times exercise his powers for the purposes they were conferred, for the best interest of the Company;
- To disclose immediately all contractual interests whether directly or indirectly with the Company;
- No conflict of interest in the Company nor may he use confidential information obtained by reason of his office for his own advantage or that of others;
- At all times act with utmost good faith towards the Company in any transaction and to act honestly and responsibly in the exercise of his powers in discharging his duties;
- Practise highest level of integrity and ethics;
- Adhere to the anti-corruption laws and regulations;
- Manage key corruption risks;
- To provide assurance to internal and external stakeholders on regulatory compliance:
- Tone from the top – organisation's stance against corruption in business; and
- Efforts to improve corruption risk management framework, internal control system, review and monitoring and training and communication.

(II) The management should at all times observe the following codes:

- Regular review and evaluate policies and procedures on anti-corruption;
- Plan, establish, implement and maintain monitoring programme;
- Conduct internal audit of anti-corruption measures;
- Evaluation of policies and procedures on anti corruption
- Monitor performance of employees on anti-corruption policies and procedures;
- Disciplinary proceedings against non-compliances;
- Develop and disseminate internal and external training and communications, in proportion to operations;
- Policy on anti-corruption publicly available and communicated to personnel and business associates;
- Provide employees and business associates training on MyTech Group anti-corruption policy and procedures;
- Practises highest level of integrity and ethics;
- Complies with anti-corruption laws and requirements; and
- Manages key corruption risks.

(III) To achieve this target, all employees shall assume the following responsibilities :

- To act within the authority conferred upon them in the best interests of the Company;
- To act in the best interest of, and fulfil their fiduciary obligations to the Company;
- To deal with customers, suppliers, related parties and stakeholders of MyTech Group's business with integrity;
- Conduct themselves in a professional and respectful manner and not take improper advantage of their position;
- To act in good faith, honest, impartial, responsibly, with due care, competence and diligence, without allowing their independent judgment to be subordinated and legitimate business development;
- Produce quality products and protect the environment in accordance with the safe operation regulations of MyTech Group;

- Sincerely and equally treat all of the customers and suppliers;
- Avoid conflict of personal interests and corporate interests;
- Protect and proper use of internal information, materials, property and resources of the Company;
- Non-public information shall keep in confidential and is not for private interests;
- Adhere to the anti-corruption laws and regulations.

(IV) When dealing business on behalf of MyTech Group, each employee shall adhere to high ethical standards to maximize its benefits. The following situations shall be handled with extra-care to avoid violation of the rules and regulations of MyTech Group:

- Employees shall not accept or claim any amount of gratification, cash, gifts, privileges or hospitality, unless it is consistent with the provision in the Anti Bribery Policy and Framework of the Company;
- Employees shall strive to avoid or shall accurately report any potential conflicts of interest between individuals and MyTech;
- Without permission, employees shall not disclose confidential information to external person or employees within the Group who shall not be informed with such information;
- When reporting or handling the financial statements, employees shall not tamper, falsify, deliberately omit, hide the fact;
- If the staff has any questions in relation to the ethics standards of MyTech, please ask supervisors or managers for a clear guide;
- It is the responsibility of every employee to protect the tangible and intangible assets of the Group; and
- Adhere to the anti-corruption laws and regulations.

(V) Non-discriminating principles

As part of its COCE, MyTech Group insists that everyone is equal and mutual respect.

MyTech Group will not discriminate against suppliers, employees or stakeholders for the race, colour, age, sex, religion, disability or nationality etc.

(VI) Gratification and Gifts

Any form of corruptly gives, agree to give, promises, offers or corruptly accepts or obtains, or agrees or attempts to obtain, request, demand from any person, for himself or for any other person of any gratification/ gifts with economic values from suppliers, representatives of suppliers or potential suppliers is prohibited.

The selection of suppliers, partners is based on competitive prices, reliable quality and timely delivery.

Strictly forbid:-

- a) Bribery, procurement or preferential condition;
- b) Bribery, procurement or other actions to customers to achieve the sales target;
- c) Bribery and money laundering.

D. ANTI-CORRUPTION / BRIBES POLICY

To achieve high standards of business, professional and ethical conduct, the Directors, management and staff (whether acting in their own capacity or on the Company's behalf) are committed to refrain themselves from authorising offering, giving or receiving any gratification, gifts and any other form of benefits (in kind, cash, advantages and/or favour and etc) from persons or entities who deal with the Company where the gratification or gift would reasonably be expected to influence the performance of the Directors', management's and employees' duties in any aspect.

The selection of suppliers, partners is based on competitive prices, reliable quality and timely delivery. Bribery or preferential condition is strictly forbidden.

Bribery or other actions to customers to achieve sales target of the Company is prohibited.

To achieve a clear zero-tolerance policy in the event of bribery or corruption. In this regard, MyTech Group should establish and maintain the Policies and Procedures on Anti-Corruption that are, at a minimum, guided by the Guidelines on Adequate Procedures issued pursuant to Section 17A(5) of the Malaysian Anti-Corruption Commission Act 2009 ("MACC Act"), which should cover MyTech Group.

The Policies and Procedures on Anti-Corruption, which should cover the areas of bribery, gratification, gifts and business courtesies, events and arrangements, facilitation payment, use of middlemen, use of lobbyists and gifts and arrangements for public authorities.

The COCE is communicated and published to MyTech Group's employees for their reference and guidance on appropriate business conduct. MyTech Group's suppliers and other stakeholders are encouraged to raise incidents of any non-compliance to MyTech Group.

E. ANTI-MONEY LAUNDERING

Directors, management and employees:-

1. should not involve in any form of money laundering activities;
2. be aware of the applicable anti-money laundering laws;
3. be mindful of the risk of the Company's business being used for money laundering activities; and
4. to raise any suspicious transactions.

F. The COCE is published on the Company's website.

G. The COCE is to be periodically reviewed and at least once every 3 years.