



PANTECH GROUP HOLDINGS BERHAD
(Company No. 733607 W)

CODE OF ETHICS

[Updated on 11 June 2018]

PANTECH GROUP HOLDINGS BERHAD (Company No. 733607 W)

CODE OF ETHICS

PANTECH GROUP HOLDINGS BERHAD (“PANTECH”) and its Group of companies (“PANTECH GROUP”) will strictly observe the principles of honesty, impartial and fairness with legal and moral standards. All employees of PANTECH GROUP must comply with all national, provincial and local laws, ordinances, regulations of their localities, as well as this policy.

The code of ethics of PANTECH aimed to provide staff with certain rules and standards to be followed in their connections with customers, suppliers and other related parties of our business. PANTECH strictly prohibits any suspicious or illegal intelligence gathering, in order to protect the reputation and employees to avoid the occurrence of any unethical business behavior.

PANTECH is committed to develop business with high ethical standards, determined to provide quality products and outstanding services globally.

All Directors, Management and staffs will strictly comply with high ethical standards and perform all obligations of an outstanding corporate.

I. To achieve this target, all employees shall assume the following responsibilities:

- a) Produce quality products and protect the environment in accordance with the safe operation regulations of PANTECH;
- b) Sincerely and equally treat all of the customers and suppliers;
- c) Honest, impartial and legitimate business development;
- d) Avoid conflict of personal interests and corporate interests;
- e) Protect and proper use of internal information, materials, property and resources of the Company;
- f) Non-public information shall keep in confidential and is not for private interests; and
- g) Prevent the abuse of power, corruption, insider trading and money laundering.

II. When dealing business on behalf of PANTECH, 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 PANTECH :

- a) Employees shall not accept or claim any amount of cash, gifts, privileges or hospitality, unless it is consistent with normal business practices, such as normal business meals, annual trips, service award, etc.;
- b) Employees shall strive to avoid or shall accurately report any potential conflicts of interest between individuals and PANTECH;
- c) Without permission, employees shall not disclose confidential information to external person or employees within the Group who shall not be informed with such information; and
- d) When reporting or handling the financial statements, employees shall not tamper with, falsified, deliberately omitted or hide the fact.

If the staff have any questions in relation to the ethics standards of PANTECH, 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.

III. Non-discriminating principles

As part of its code of ethics, PANTECH insists that everyone is equal and respected as an individual.

PANTECH will not discriminate against suppliers, customers, employees and shareholders.

IV. Gifts

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

Dated this 11 June 2018