



CE Technology Berhad

Co. No.: 200201018747(586410-P)
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Tel : +605-8910716 Fax : +605-8910717 Email : hello@ceglobal.com.my
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Anti-Bribery and Anti-Corruption Policy

PURPOSE

This policy defines an important aspect in dealing with improper solicitation, bribery and other corrupt activities and related issues that may arise in the Company's course of business.

This policy is part of our efforts to inculcate corporate accountability at the individual level and enable the Company to consistently reach high standards of corporate governance, corporate social responsibility and professionalism.

This policy sets out the Company's position on bribery in all its form and matters of corruption that might confront the Company in its day to day operations. It also provides guidance on how to act when subjected to potential acts of bribery and matters of corruption.

COVERAGE

This policy applies to all suppliers, contractors and sub-contractors, consultants, business partners, stakeholders, and employees directly or indirectly employed by CE Technology Berhad (CET).

All disciplinary action to be taken against employees after the conclusion of investigations of this nature shall be in accordance with Grievance, Misconduct, and Disciplinary Policy and Procedure, and within applicable labour laws and procedures. In the case of proven wrongdoing or improper conduct involving an external party, this fact shall be made known to the Managing Director and CEO (MD & CEO) in order for decision on the next course of action.

POLICY

The Company is committed to conducting business dealings with integrity, honesty and respect. The Company also has adopted a zero-tolerance approach



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against all forms of bribery and corruption. This means avoiding practices of bribery and corruption of all forms in the Company's daily operations, including giving or receiving such bribes or kickbacks.

Employees who refuse to pay bribes or participate in acts of corruption will not be penalised even if such refusal may result in losing business.

The policy reflects the Company's dedication to maintaining the highest level of integrity and ethics in the Company. This policy applies to all employees in CET and compliance is mandatory.

REPORTABLE CONDUCT

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal, unethical or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage and can take the form of gifts, loans, fees, rewards or other advantages.

Corruption is the abuse of entrusted power for private gain.

Bribery and corruption which may take the form of anything of value, such as money, goods, services, property, privilege, employment position or preferential treatment, and are in all forms prohibited.

The following is a non-exhaustive list of examples of reportable conduct under the scope of this policy:

- 1) Offer, promise or make any attempt at dishonestly influencing the person's decision by directly or indirectly offer or make promise of corrupt payments, in cash or in kind;
- 2) Be involved in any discussions regarding business or employment opportunities, for their own personal benefit or for the benefit of the external party;



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- 3) Otherwise abuse the decision-making and other delegated powers given by the top management, in order to illicitly secure an outcome which would be to the commercial advantage to themselves and/or the Company; and
- 4) Exert improper influence to obtain personal benefits from them.

EMPLOYEES' RESPONSIBILITY

- 1) Every employee has the responsibility to ask questions, seek guidance, report suspected violations, and express concerns regarding compliance of the Company's code of conduct or good governance practices.
- 2) Any employee who knows or believes that any other employees or parties covered in the scope of this policy has engaged or is engaging in a conduct that violates applicable laws or Company's code of conduct or good governance practices should report such information to the respective Head of Department or to the Executive Assistant to the CEO, or the CEO.
- 3) CEO will have the authority to decide on action to be taken, if any.

COMPANY'S & MANAGEMENT'S OBLIGATION

The Company regards bribery and acts of corruption as serious matters and will apply penalties in the event of non-compliance with this policy. For the Company's employee, non-compliance may lead to disciplinary action.

For external parties, this fact shall be made known to the MD & CEO in order for decision on the next course of action.

The Company provides assurance and protection to the reporting person of such anti-bribery & corruption against retaliation, if the report is made in good faith. Any employee found to have deliberately acted against the interests of a person



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who has in good faith reported a violation or possible violation of this policy shall be subjected to disciplinary action.

This policy shall be read in conjunction with the Whistle Blowing Policy as well as the Malaysian Anti-Corruption Commission Act 2009 and its amendments "MACCA")

ABUSE OF THE SYSTEM

An employee who makes a false report that is not in good faith, i.e. was done primarily with malice to damage another person or the organisation, is subject to appropriate action within the Company's policy or labour laws, if appropriate.

FURTHER RECOURSE

If the reporting employee believes that insufficient action was taken to address a report, he or she may contact the HR Manager and or office helpdesk.

ANONYMOUS COMPLAIN

The Company provides internal anonymity; however, it cannot guarantee this will be retained if external legal action flows from the disclosure.

The Company is not accountable for maintaining anonymity where the employee has told others of the alleged misdemeanour.

Whilst the Company encourages such reporting employees to identify themselves, anonymous complains will nevertheless be taken seriously and investigated fully. However, the effectiveness of any enquiry may be limited where an individual chooses not to be identified.

ADVICE FOR EMPLOYEE MAKING DISCLOSURE

The Company acknowledges that making disclosures of impropriety is a difficult decision for an employee to make. As the issues that prompt the concern are



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likely to be complex, the employee should strive to be accurate in his or her observations and claims, and keep formal records documenting relevant events. Employees are encouraged to express their concerns at the earliest opportunity so that timely action can be taken.

RESPONSIBILITY

Manager, Human Resource & Corporate Social Responsibility

CONTACT

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Approved by the Board of Directors on 28 September 2020