



# **WTEC GROUP BERHAD**

202401017425 (1563275-K)

## **WANMEI SPECIALTY TECH SDN. BHD.**

201001036557 (920480-V)

## **WTEC SDN. BHD.**

200101028926 (564684-H)

# **ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

**24<sup>TH</sup> AUGUST 2024**



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# **ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

## **1.0 WTEC GROUP BERHAD COMMITMENT**

WTEC Group Berhad and its subsidiaries, WTEC Sdn. Bhd. and WanMei Specialty Tech Sdn. Bhd. are committed to conducting business dealings with integrity. This means avoiding practices of bribery and corruption of all forms in the company's daily operation. The group has adopted a zero tolerance approach against all forms of bribery and corruption and takes a strong stance against such acts. Employee who refuse to pay or receive bribes or participate in acts of corruption will not be penalized even if such refusal may result in the company losing its business or not meeting the targets.

Compliance to the policy is mandatory and will be monitored with a principle-based approach.

## **2.0 BACKGROUND**

The group highlighted integrity as the first core values in the organization. Each employee shall uphold high levels of personal and professional values in all business interactions and decisions.

The nature of a group's business requires its employees to engage in business with a wide range of parties, both internal as well as external. This policy establishes the boundaries on interactions with all parties.

This policy also provides guidance on how to act when subjected to potential acts of bribery and matters of corruption.

## **3.0 OBJECTIVES**

This policy sets out the Group's position on bribery in all its form and matters of corruption that might confront the Group in its day-to-day operations.

## **4.0 SCOPE**

This policy applies to all directors and employees of the group.

## 5.0 DEFINITIONS

The following definitions are included in this policy.

<p>Bribery</p>	<p>Bribery is defined as any action which would be considered as an offence of giving or receiving ‘gratification’ under the Malaysian Anti- Corruption Commission Act 2009 (MACCA).</p> <p>In practice, this means offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person a position of trust within an organisation.</p> <p>‘Gratification’ is defined in the MACCA to mean the following:</p> <p><i>(a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;</i></p> <p><i>(b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;</i></p> <p><i>(c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;</i></p> <p><i>(d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;</i></p> <p><i>(e) any forbearance to demand any money or money’s worth or valuable thing;</i></p> <p><i>(f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and</i></p> <p><i>(g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).</i></p> <p>Bribery may be ‘outbound’, where someone acting on behalf of the Group attempts to influence the actions of someone external, such as a Government official or client decision-maker.</p> <p>It may also be ‘inbound’, where an external party is attempting to influence someone within the Group such as a decision-maker or someone with access to confidential information.</p> <p>Bribery and corruption are closely related. However, corruption has a wider remit. See ‘Corruption’ definition below.</p>
<p>Corruption</p>	<p>The Transparency International definition of corruption is ‘the abuse of entrusted power for personal gain.’</p> <p>For the purpose of this policy, corruption, is defined primarily as any action which would be considered as an offence of giving or receiving ‘gratification’ under the Malaysian Anti-Corruption Commission Act 2009 (MACCA) (‘Bribery’ as defined above).</p> <p>In addition, corruption may also include acts of extortion, collusion, breach of trust, abuse of power, trading under influence, embezzlement, fraud or money laundering.</p>
<p>Conflict of interest</p>	<p>When a person’s own interests either influence, have the potential to influence, or are perceived to influence their decision making of the Group.</p>

Donations and Sponsorship	Charitable contributions and sponsorship payment made to support the community.
Directors	Directors include all independent and non-independent directors, executive and non-executive directors of the Group and shall also include alternate or substitute directors.
Facilitation Payment	A payment or other provision made personally to an individual in control of a process or decision. It is given to secure or expedite a routine or administrative duty or function.
Corporate Gift	Something given from one organisation to another, with the appointed representatives of each organisation giving and accepting the gift. Corporate gifts may also be promotional items given out equally to the general public at events, trade shows and exhibitions as a part of building the company's brand. The gifts are given transparently and openly, with the implicit or explicit approval of all parties involved. Corporate gifts normally bear the company name and logo and are of nominal value. Examples of corporate gifts include items such as diaries, table calendars, pens, notepads, plaques, and festive gifts such as hampers, oranges and dates.
Personal Gift	Something given from one individual to another, with the intention of creating or enhancing a personal relationship. The gifts are given in a private setting, without the knowledge or approval of the company management of one or both parties. Personal gifts may include cash, cash equivalents such as credit cards, bitcoin or savings accounts, electronic items, watches, luxury pens, property, vehicles, free fares, shares, interest free loans, lottery tickets, travel facilities, entertainment, services, club memberships, any forms of discount or commission, jewellery, decorations, souvenirs, vouchers or any other valuable items.
Employees	All individuals directly contracted to the Group on an employment basis, including permanent and temporary employees and Directors.

## 6.0 ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

All employees and associated persons are required to:

- ❖ Comply with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business
- ❖ Act honestly, responsibly and with integrity
- ❖ Safeguard and uphold the Company's core values by operating in an ethical, professional and lawful manner all the time.

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside, or accounts created for the purposes of facilitating the payment or receipt of a bribe.

The Company recognises that industry practices may vary from country to country or from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidelines set out in this Policy is always expected of all employees and associated persons. If in doubt as to what might amount to bribery or what might constitute a breach of this Policy, refer the matter to your Head of Department/ Manager or Human Resources.

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For the Company's rules to the receipt of business gifts from third parties and corporate hospitality offered to or received from third parties, form part of the Company's zero tolerance policy towards bribery

The giving of business gifts to clients, customers, contractors and suppliers is not prohibited provided the following requirements are met:

- a) the gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage
- b) it complies with local laws
- c) it is given in the Company's name, not in the giver's personal name
- d) it does not include cash or a cash equivalent (such as gift vouchers)
- e) it is of an appropriate and reasonable type and value and given at an appropriate time
- f) it is given openly, not secretly
- g) it is approved in advance by a director of the Company.

In summary, it is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

Any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a "facilitation payment", is also strictly prohibited.

To attain business practices free of corruption, the Corporate Social Responsibility (CSR), business transactions must be transparent to guarantee a certain degree of fairness and permit the participation of different interested parties. Therefore, any anticorruption activities for enterprise and management can be sued in the field of Corporate Social Responsibility (CSR), which will consequently result in better CSR condition.

## **7.0 RECOGNITION OF LOCAL AND INTERNATIONAL LEGISLATION**

- i. The Group is committed to conducting its business ethically and in compliance with all applicable laws and regulations, including but not limited to MACCA, Malaysian Penal Code (revised 1977) (and its amendments), the Companies Act 2016 (Malaysia), the US Foreign Corrupt Practices Act 1977 (amended 1998), and the UK Bribery Act 2010. These laws prohibit bribery and corruption. Organisations are mandated to establish and maintain accurate books and records as well as adequate measures to prevent corrupt practices.
- ii. In cases of conflict between mandatory law and the principles contained in this Policy the law shall prevail.

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## 8.0 RESPONSIBILITIES OF EMPLOYEES

Employees are responsible for understanding and complying with this Policy. In particular, the role of all Employees includes the following:

- i. Be familiar with applicable requirements and directives of the policy and communicate them to subordinates;
- ii. Promptly record all transactions and payments accurately and in reasonable detail;
- iii. Always raise suspicious transactions to immediate superiors for guidance on next course of action;
- iv. Promptly report violations or suspected violations through appropriate channels;

## 9.0 CONFLICT OF INTEREST

Conflicts of interest arise in situations where there is a personal interest that might be considered to interfere with that person's objectivity when performing duties or exercising judgement on behalf of the Group. Employees should avoid or deal appropriately with situations in which personal interest could conflict obligations or duties. Employees must not use their position, official working hours, Group resources and assets for personal gain or to the Group's disadvantage.

## 10.0 REPORTING OF POLICY VIOLATIONS

Employees who encounter actual or suspected violations of this Policy are required to report their concerns. Each Employee has a responsibility to ensure that suspected -bribery and corruption incidents are reported promptly. The Group practices an open-door policy and encourages all Employees to share concerns and suggestions with superiors and colleagues who can address them in an appropriate manner.

Reports should be sent directly to Human Resources/Admin which will be reported directly to the Group's Top Management. The contact information of the responsible member is as follows:

HR & Admin Manager – Ms. Chieu  
Email: [pychieu@wtegroup.com.my](mailto:pychieu@wtegroup.com.my)

HR Jr. Executive – Ms. Dahliani  
Email: [hr1@wtegroup.com.my](mailto:hr1@wtegroup.com.my)

Reports may also be sent to the Head of Department or anyone in Senior Management. Reports made in good faith, either anonymously or otherwise, shall be addressed in a timely manner and without incurring fear of reprisal regardless of the outcome of any investigation.

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## 11.0 SANCTIONS FOR NON-COMPLIANCE

The Group regards bribery and corruption as a serious matter. Non-compliance may lead to disciplinary action, up to and including termination of employment. Further legal action may also be taken if the Group's interests have been harmed because of non-compliance.

The Group shall notify the relevant regulatory authority if any identified bribery or corruption incidents have been proven beyond reasonable doubt.

Where notification to the relevant regulatory authorities have been done, the Group shall provide full co-operation to the said regulatory authorities, including further action that such regulatory authority may decide to take against convicted Employees.

A handwritten signature in black ink, appearing to be 'A. J. J.', written over a large, stylized circular flourish.

Managing Director

### **WTEC Group Berhad**

PT1558, Kawasan Perindustrian Kajang Jaya,

43500 Semenyih, Selangor, Malaysia.

Effective Date: 24/08/2024



# APPENDIX

**APPENDIX I: FORMAT FOR ANTI-CORRUPTION REPORT****-STRICTLY PRIVATE & CONFIDENTIAL-****ANTI-CORRUPTION REPORT FORM****Details of Reporter**

Name : \_\_\_\_\_

Address : \_\_\_\_\_  
\_\_\_\_\_

Contact No. : \_\_\_\_\_

Email : \_\_\_\_\_

Signature : \_\_\_\_\_

**Names of those involved**

1.	4.
2.	5.
3.	6.

**Details of Concern****Date of Report :**