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1. INTRODUCTION

This Anti-Bribery and Corruption Policy (the “Policy”) sets out the procedures to observe and uphold the position on the areas of bribe, corruption, gifts, facilitation payment and kickbacks. All Directors and employees of Zen Tech International Berhad as well as the subsidiaries (of the “Company” or the “Group”) shall comply with this Policy.

2. OBJECTIVE

The objectives of this Policy are to ensure that the Board, all employees, and officers of the Group comply with the anti-bribery and corruption procedures and, at the same time promote integrity, transparency and avoid conflict of interest in accordance with the Group’s principles of good corporate governance.

3. COMMITMENT AND COMPLIANCE

The Group has adopted a zero-tolerance approach against all forms of bribery and corruption. It is our commitment to conduct our business dealings with integrity and ethics as well as compliance with the applicable laws and regulatory requirements on anti-corruption. It is the responsibilities of the Company to ensure its Directors and all employees understand and observe the Policy.


The Company through its Human Resource (“HR”) Department is responsible to ensure that the principles as set out in this Policy are communicated, understood, and observed by all employees and Directors.

4. PRINCIPLES AND PROCEDURES OF THE POLICY

4.1 Communication of the Policy

The Policy shall be communicated and endorsed by all employees and directors of the Group. An acknowledgement by the employees and directors of the Group certifying that they have read, understood and will abide by this policy shall be made in writing. A copy of this declaration shall be documented and retained by the HR Department throughout the duration of their employment.

The new employees will be informed and asked to sign acknowledgment of the Policy to ensure that they have read, understood, and will abide by the Policy as part of the new employees’ induction program conducted by the HR department.

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4.2 Anti-Bribery and Corruption Compliance

The HR department will provide advice and guidance to employees on the Policy and issues relating to bribery and corruption to ensure compliance of the Policy.

The Company shall conduct regular risk assessments to identify the bribery and corruption risks affecting the business.

4.3 Training and Awareness

The HR department shall conduct awareness programme for all its employees on the Company's position regarding anti-bribery and corruption, integrity, and ethics. All records on training provided shall be maintained in accordance with the Training Procedure of the Group's ISO Quality Management System.

4.4 Reporting of Policy Violations

All employees, in the course of their activities relating to their employment at Company, encounter actual or suspected violations of this Policy shall raise and report their concerns in accordance with the Company's Whistleblowing Policy.

5. REVIEW OF THE POLICY

This Policy shall be reviewed by the Board annually to ensure it remains consistent with the Company's objectives and Board's responsibilities and in line with the applicable laws and legislations.