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## 1. INTRODUCTION

This Code of Ethics and Conduct (the “Code”) stipulates the sound principles to guide all Directors and employees of Zen Tech International Bhd (the “Company” or the “Group”) in discharging their duties and responsibilities and in dealing with its stakeholders, customers, fellow employees and regulators to demonstrate good judgment and honesty, loyalty and ethics in the conduct of our business.

## 2. OBJECTIVE

The objectives of this Code are to ensure that the Board, all employees, and officers of the Group to whom this Code applies, are aware and understand their obligations and responsibilities as set out in this Code.

## 3. COMMITMENT AND COMPLIANCE

It is our commitment to ensure compliance with relevant laws, rules, and regulations applicable to our business activities. It is the responsibilities of the Company to ensure its Directors and all employees understand, observe, and comply with the laws, rules, and regulations that applicable to their specific roles and responsibilities in conducting the business activities with integrity. The Company is responsible for preventing violation of law and voice out for any possible violations within the Company.

Compliance with the principle of this Code is an essential element in business success. The Company through its Human Resource Department is responsible to ensure that the principles as set out in this Code are communicated, understood, and observed by all employees and Directors. Compliance with the Code is being monitored and reported by the internal auditors and subject to review by the Board on an annual basis.


## 4. PRINCIPLES OF THE CODE

### 4.1 Competition

We are dedicated to ethical, fair, and robust competition where all our suppliers, customers and vendors shall be treated fairly and consistently. The Company’s products and services shall be offered to them at the most suitable and competitive terms to ensure the Company products and services are delivered honestly and fairly to meet their expectations. As such, any false and misleading statements are not acceptable.

### 4.2 Protecting Confidential Information

Information is one of the important assets of the Company. All information about the financial and personal of the customers, suppliers, employees, and others which are collected and is useful to the Company or the competitor shall be treated confidential and protected. This information shall not be shared with any unauthorized persons or third party. Directors and employees of Company must not engage in unauthorized use, disclose, copy, or distribute this information.

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#### **4.3 Conflict of Interest**

Employees and Directors must not use their positions or their knowledge of the Company to engage in any relationship or activities which may impair their ability to make objective and fair decisions in the course of discharging their duties. Employees and Directors must not use the property or information of Company or to compete with the Company for personal interest or gain which may conflict with the Company interest and caused damage or losses to the Company. All actions or decisions made, and activities undertaken within the Company shall be for the best interest of the Company. Employees who have doubt in issues related to conflict of interest should seek advice from the management before engaging in any activities, transaction or relationship that might give rise to conflicts of interest.

#### **4.4 Gifts, Entertainment and Corporate Hospitality**

In most businesses, gifts, entertainment, and corporate hospitality are being used to foster business relationships. The Company do not encourage and as a rule, advice its employees and directors not to accept gifts, entertainment and corporate hospitality that could, in any way, influence, or appear to influence business decision or create appearance of favoritism which may adversely affect the reputation, impartiality and fair dealing of the Company. Likewise, gifts, entertainment and corporate hospitality must not be provided to any party with the intention to induce them to solicit business or to exercise their discretion in favour of the Company for business.

#### **4.5 Whistleblowing Policy**

The Company believe that the in place of the Whistleblowing Policy will facilitate and encourage disclosure of genuine concerns about any possible violations and improprieties in matters related to financial reporting, compliances and other malpractices committed within the organization. Should any employees have information regarding the violation or improprieties, he/she should report the matter immediately to the line manager, higher management, or the Board. All reports or complaints of this nature shall be treated strictly confidential unless otherwise required disclosure by law or court order.

### **5. REVIEW OF THE CODE**

This Code 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 relevant laws and legislation.