



M.A.C. TECHNOLOGY (M) SDN. BHD.
COMPANY No.: 199201003083 (New) / 234587-P (Old)

LOT 16, JALAN BUNGA TANJUNG 2,
SENAWANG INDUSTRIAL PARK,
70400 SEREMBAN,
NEGERI SEMBILAN DARUL KHUSUS,
MALAYSIA.
TEL: 06-6781311 FAX: 06-6781322

INTEGRITY MANAGEMENT CODE OF PRACTICE

Prepared By: Chloe Lee Pei Fen

Check By: Leang Yoke Ngoh

Approval By: Hooi Chee Liong

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Revision 2

Integrity Management Code of Practice

Article 1 Purpose and Scope of Application

In order to assist the company to establish a corporate culture of honest management and sound development, and provide a reference framework for its establishment of sound business operations, this code is formulated with reference to the relevant provisions of the "Code of Integrity Management for Listed OTC Companies".

The scope of application of this Code applies to group enterprises and organizations such as the Company and its subsidiaries, consortium legal persons, and other institutions or legal persons with substantial control capabilities (hereinafter referred to as "group enterprises and organize").

Article 2 Dishonest Behavior Is Prohibited

The company's directors, managers, employees, assignees, or persons with substantial control capabilities (hereinafter referred to as "substantial controllers") shall not directly or indirectly provide, promise, request or accept any Improper interests, or other dishonest acts that violate integrity, illegality, or breach of fiduciary obligations in order to obtain or maintain benefits (hereinafter referred to as "dishonest acts").

The targets of the preceding paragraph include public officials, political candidates, political parties, or party officials, and any public or private enterprises or institutions and their directors (councilors), supervisors (supervisors), managers, employees, and substantive controllers. or other interested parties.

Article 3 Form of Interests

The benefits referred to in this Code refer to anything of value, including money, gifts, commissions, positions, services, preferential treatment, kickbacks, etc. in any form or name. However, this restriction does not apply when it is a normal social etiquette and is accidental without the risk of affecting specific rights and obligations.

Article 4 Compliance with Laws and Regulations

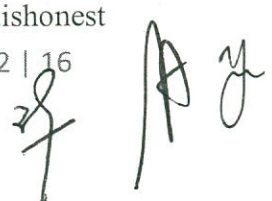
The company shall abide by the Company Law, Securities Exchange Law, Commercial Accounting Law, Political Contribution Law, Corruption Regulations, Government Procurement Law, Public Officials' Conflict of Interest Avoidance Law, relevant regulations on listing and listing or other business conduct-related laws and regulations as a means of implementing integrity Basic premise of business.

Article 5 Policy

Based on the business philosophy of integrity, transparency and responsibility, the company should formulate policies based on honesty, approved by the board of directors, and establish a good corporate governance and risk control mechanism to create a sustainable business environment.

Article 6 Prevention Program

The integrity management policy formulated by the company should clearly and detailedly formulate the specific practices of integrity management and the prevention plan for dishonest



behavior (hereinafter referred to as the "prevention plan"), including operating procedures, behavior guidelines, education, and training, etc.

The prevention plan formulated by the company shall comply with the relevant laws and regulations of the place where the company and its group enterprises and organizations operate. In the process of formulating prevention plans, the company should communicate with employees, labor unions, important business contacts or other interested parties.

Article 7 Scope of The Preventive Program

The company shall establish a dishonesty risk assessment mechanism to regularly analyze and evaluate business activities within the business scope that have a relatively high risk of dishonesty, formulate prevention plans, and regularly review the appropriateness and effectiveness of the prevention plans.

It is advisable for the company to formulate a preventive plan with reference to domestic and foreign standards or guidelines, which should at least cover the following preventive measures:

1. Giving and accepting bribes.
2. Providing illegal political donations.
3. Improper charitable donations or sponsorships.
4. Offering or accepting unreasonable gifts, entertainment, or other improper benefits.
5. Violation of business secrets, trademark rights, patent rights, copyrights, and other intellectual property rights.
6. Engaging in acts of unfair competition.
7. Products and services that directly or indirectly damage the rights, health and safety of consumers or other stakeholders during research and development, procurement, manufacture, provision, or sale.

Article 8 Commitment and Implementation

The company should require directors and senior management to issue a statement of compliance with the integrity management policy, and require employees to abide by the integrity management policy in terms of employment conditions.

The company and its group companies and organizations should express the policy of honest management in its regulations, external documents, and company website, as well as the commitment of the board of directors and senior management to actively implement the honest management policy, and implement it in internal management and business activities.

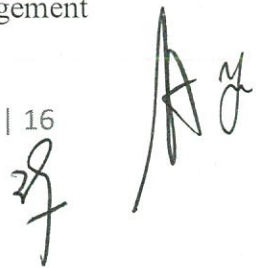
The company shall prepare documented information and keep it properly for the integrity management policies, statements, commitments, and implementation of the first two items of this article.

Article 9 Integrity Management of Business Activities

The company shall conduct business activities in a fair and transparent manner based on the principle of honest operation.

Before doing business, the company should consider the legitimacy of its agents, suppliers, customers, or other business partners and whether they are involved in dishonest behavior, and avoid conducting transactions with those involved in dishonest behavior.

The content of the contract signed by the company with its agents, suppliers, customers, or other commercial transaction partners shall include compliance with the integrity management

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policy and clauses that the counterparty of the transaction may terminate or rescind the contract at any time if it is involved in dishonest behavior.

Article 10 Prohibition of Giving and Accepting Bribery

The company and its directors, managers, employees, assignees, and substantial controllers shall not directly or indirectly provide, to customers, agents, contractors, suppliers, public officials or other interested parties, Promise, request or accept any form of improper benefits.

Article 11 Prohibition of Illegal Political Contributions

The company and its directors, managers, employees, assignees, and substantial controllers shall directly or indirectly provide donations to political parties or organizations or individuals participating in political activities, which shall comply with the Political Contribution Law and relevant internal operating procedures of the company. For commercial gain or transactional advantage.

Article 12 Prohibition of Improper Charitable Donations or Sponsorships

The company and its directors, managers, employees, assignees, and substantial controllers shall comply with relevant laws and internal operating procedures for charitable donations or sponsorships, and shall not offer bribes in disguise.

Article 13 Prohibition of Unreasonable Gifts, Entertainment, or Other Improper Benefits

The company and its directors, managers, employees, assignees, and substantial controllers shall not directly or indirectly provide or accept any unreasonable gifts, entertainment, or other improper benefits in order to establish business relationships or influence business transactions.

Article 14 Prohibition of Infringement of Intellectual Property Rights

The company and its directors, managers, employees, assignees, and substantial controllers shall abide by laws and regulations related to intellectual property, the company's internal operating procedures and contract regulations; Damage or other violations of intellectual property rights.

Article 15 Prohibition of Unfair Competition

The company shall engage in business activities in accordance with relevant competition laws and shall not fix prices, manipulate bids, limit production and quotas, or share or divide the market by allocating customers, suppliers, operating areas, or business types.

Article 16 Preventing Products or Services from Harming Interested Parties

The company and its directors, managers, employees, assignees and substantial controllers shall abide by relevant laws and international standards during the research and development, procurement, manufacturing, provision or sales of products and services, and ensure the information of products and services Transparency and safety, formulate and disclose its consumer or other stakeholder rights and interests protection policies, and implement them in operational activities to prevent products or services from directly or indirectly damaging the rights, health and safety of consumers or other stakeholders. When there are enough facts to believe that its products or services may endanger the safety and health of consumers or other

stakeholders, in principle, the batch of products should be recalled immediately or its services should be stopped.

Article 17 Organization and Responsibilities

The company's directors, managers, employees, assignees, and substantial controllers should fulfill the duty of care of a good manager, urge the company to prevent dishonest behavior, and review its implementation results and continuous improvement at any time to ensure the implementation of the integrity management policy .

In order to improve the management of integrity management, the company should set up a dedicated unit under the board of directors, allocate sufficient resources and qualified personnel, be responsible for the formulation and supervision of the integrity management policy and prevention plan, mainly in charge of the following matters, regular (at least one) once a year) report to the Board of Directors:

1. Assist in the integration of integrity and moral values into the company's business strategy, and cooperate with laws and regulations to formulate relevant anti-fraud measures to ensure honest management.
2. Regularly analyze and evaluate the risk of dishonesty within the scope of business, and formulate plans to prevent dishonesty based on this, and formulate standard operating procedures and behavior guidelines related to work and business in each plan.
3. Planning internal organization, staffing, and responsibilities, and establishing mutual supervision and checks and balances mechanisms for business activities within the scope of business with a relatively high risk of dishonesty.
4. Promotion and coordination of honesty policy publicity and training.
5. Planning the reporting system to ensure the effectiveness of implementation.
6. Assist the board of directors and the management to check and evaluate whether the preventive measures established in the implementation of integrity management are operating effectively, and regularly evaluate the compliance status of relevant business processes and prepare reports.

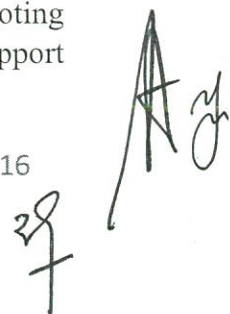
Article 18 Compliance with Laws and Regulations for Business Execution

The company's directors, managers, employees, assignees, and substantial controllers shall abide by laws and regulations and preventive plans when performing business.

Article 19 Avoidance of Interests

The company shall formulate a policy to prevent conflicts of interest, so as to identify, monitor and manage risks of dishonest behavior caused by conflicts of interest, and provide appropriate channels for directors, managers and other interested parties attending or attending the board of directors to voluntarily declare their Whether there is a potential conflict of interest with the company.

Directors, managers, and other interested parties attending or attending the board of directors who have an interest in the proposals listed on the board of directors, themselves, or the legal person they represent, shall explain the important content of their interests at the current board meeting. When the interests of the company are in danger, they shall not participate in discussions and votes, and shall avoid discussions and votes, and shall not exercise their voting rights on behalf of other directors. Directors should also be self-disciplined and have to support each other.

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The directors, managers, employees, assignees, and substantial controllers of the company shall not use their positions or influence in the company to obtain improper benefits for themselves, their spouses, parents, children, or anyone else.

Article 20 Accounting and Internal Control

The company shall establish an effective accounting system and internal control system for business activities with a relatively high risk of dishonesty, and shall not have external accounts or keep secret accounts, and shall review at any time to ensure that the design and implementation of the system continue to be effective.

The company's internal audit unit shall draw up relevant audit plans based on the assessment results of dishonesty risks, including audit objects, scope, items, frequency, etc., and check the compliance with the prevention plan based on this, and may appoint accountants to carry out the audit, if necessary. When necessary, professional assistance may be entrusted.

The audit results in the preceding paragraph shall be notified to the senior management and the unit responsible for integrity management, and an audit report shall be prepared and submitted to the board of directors.

Article 21 Operating Procedures and Behavior Guidelines

The company shall formulate operating procedures and conduct guidelines in accordance with the provisions of Article 6, and specifically regulate the matters that directors, managers, employees, and substantial controllers should pay attention to when performing business, and the content shall at least cover the following matters:

1. Criteria for determining the provision or acceptance of illegitimate benefits.
2. Procedures for handling legal political donations.
3. Provide procedures and amount standards for legitimate charitable donations or sponsorships.
4. Regulations on avoiding conflicts of interest related to duties, and procedures for declaration and handling.
5. Confidentiality requirements for confidential and commercially sensitive information obtained in business.
6. Standardization and handling procedures for suppliers, customers, and business transaction counterparties involved in dishonest behavior.
7. Procedures for handling violations of the Code of Conduct for Corporate Integrity.
8. Disciplinary action for violators.

Article 22 Education, Training, And Assessment

The company's director, general manager or senior management should regularly communicate the importance of integrity to directors, employees, and assignees.

The company shall regularly organize education, training and publicity for directors, managers, employees, appointees, and substantial controllers, and invite counterparts who engage in business activities with the company to participate, so that they can fully understand the company's determination and policy of honest management, prevention plans and consequences of dishonesty violations.

The company should combine the integrity management policy with employee performance appraisal and human resource policies, and establish a clear and effective reward and punishment system.

Article 23 Reporting System

The company should formulate a specific reporting system and implement it in earnest. Its content should at least cover the following matters:

1. Establish and announce internal independent reporting mailboxes and special lines, or entrust other external independent organizations to provide reporting mailboxes and special lines for use by internal and external personnel of the company.
2. Designate a person or unit responsible for handling reports. Reports involving directors or senior management should be reported to independent directors, and the types of reported matters and their investigation standard operating procedures should be established.
3. After the investigation of the reporting case is completed, follow-up measures should be taken according to the seriousness of the case. When necessary, it should be reported to the competent authority or transferred to the judicial authority for investigation.
4. Records and preservation of reporting case acceptance, investigation process, investigation results, and related document production.
5. The identity of the reporter and the content of the report shall be kept confidential, and anonymous reports shall be allowed.
6. Measures to protect the whistleblower from being improperly dealt with due to the whistleblower.
7. Incentive measures for whistleblowers.

If the company's staff or unit responsible for accepting reports discovers major violations or the company is in danger of major damages, it shall immediately make a report and notify the independent directors in writing.

Article 24 Punishment and Appeal System

The company shall clearly formulate and announce the punishment and complaint system for violating the integrity management regulations, and immediately disclose information such as the title, name, date of violation, content of the violation, and handling conditions on the company's internal website.

Article 25 Information Disclosure

The company should establish quantitative data to promote integrity management, continuously analyze and evaluate the effectiveness of the integrity policy, and disclose its integrity management measures, implementation status, and previously disclosed quantitative data and promotion results on the company website, annual report, and public prospectus, and public information. The Observatory discloses the content of the Code of Conduct for Integrity.

Article 26 Review and Revision of Integrity Management Policies And Measures

The company should always pay attention to the development of relevant norms of honest management at home and abroad, and encourage directors, managers, and employees to make suggestions, based on which they can review and improve the company's honest management policies and promotional measures, so as to enhance the effectiveness of the company's honest management.

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Article 27 Implementation

This code will be implemented after being approved by the board of directors, and will be submitted to the audit committee and the shareholders' meeting. The same is true for amendments.

When the company submits the Code of Integrity Management to the board of directors for discussion in accordance with the preceding paragraph, it shall fully consider the opinions of independent directors, and record their objections or reservations in the minutes of the board meeting; if independent directors cannot attend the board meeting in person to express their objections If there are reservations or reservations, unless there are legitimate reasons, a written opinion shall be issued in advance and stated in the minutes of the board meeting.

If the company, group companies and organizations have an audit committee, the provisions of this code for supervisors shall apply mutatis mutandis to the audit committee.

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Integrity Management Operating Procedures and Behavior Guidelines

Article 1 (Purpose and Scope of Application)

The company engages in business activities based on the principles of fairness, honesty, trustworthiness, and transparency. In order to implement the integrity management policy and actively prevent dishonest behavior, it follows the "Code of Integrity Management of Listed OTC Companies" and the relevant business locations of the company, group companies and organizations. The laws and regulations stipulate the operating procedures and behavior guidelines, and specifically regulate the matters that the company's personnel should pay attention to when performing business.

The scope of application of these operating procedures and guidelines applies to subsidiaries of the company, consortia legal persons whose cumulative direct or indirect donations exceed 50%, and other institutions or legal persons with substantial control capabilities, such as group enterprises and organizations.

Article 2 (Applicable Objects)

The personnel of the company referred to in these operating procedures and conduct guidelines refers to directors, supervisors, managers, employees, assignees, and persons with substantial control ability of the company and group companies and organizations.

The company's personnel provide, promise, demand or accept any improper benefits through a third party, which is presumed to be the company's personnel.

Article 3 (Dishonest Behavior)

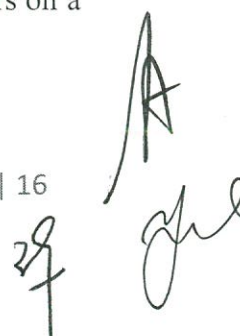
The dishonesty behavior mentioned in these operating procedures and conduct guidelines refers to the company's personnel directly or indirectly providing, accepting, promising, or requesting any improper benefits, or engaging in other violations of integrity and illegal activities in order to obtain or maintain benefits in the course of business execution. or breach of fiduciary duty. The targets of the preceding paragraph include public officials, political candidates, political parties, or party officials, and any public or private enterprises or institutions and their directors, managers, employees, persons with substantial control capacity, or other interested parties.

Article 4 (Statement of Interests)

Benefits mentioned in these operating procedures and conduct guidelines refer to money, gifts, gifts, commissions, positions, services, preferential treatment, kickbacks, facilitation payments, entertainment, entertainment and other valuable things in any form or name.

Article 5 (Designated Units and Duties)

The company designates internal audit as a dedicated unit (hereinafter referred to as the company's dedicated unit), which is subordinate to the board of directors, and allocates sufficient resources and qualified personnel to handle the revision, implementation, interpretation, consulting services and notification of this operating procedure and behavior guidelines Content registration and filing and other related operations and supervision are mainly responsible for the following matters, and should report to the board of directors on a regular basis (at least once a year):

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1. Assist in the integration of integrity and moral values into the company's business strategy, and cooperate with laws and regulations to formulate relevant anti-fraud measures to ensure honest management.
2. Regularly analyze and evaluate the risk of dishonesty within the scope of business, and formulate plans to prevent dishonesty based on this, and formulate standard operating procedures and behavior guidelines related to work and business in each plan.
3. Planning internal organization, staffing, and responsibilities, and establishing mutual supervision and checks and balances mechanisms for business activities within the scope of business with a relatively high risk of dishonesty.
4. Promotion and coordination of honesty policy publicity and training.
5. Planning the reporting system to ensure the effectiveness of implementation.
6. Assist the board of directors and the management to check and evaluate whether the preventive measures established in the implementation of integrity management are operating effectively, and regularly evaluate the compliance status of relevant business processes and prepare reports.
7. Make and properly preserve the integrity management policy and its statement of compliance, implementation of commitments and implementation status and other relevant documented information.

Article 6 (Prohibition of Offering or Accepting Improper Benefits)

When directly or indirectly providing, accepting, promising, or requesting the benefits stipulated in Article 4, the personnel of the company shall comply with the "Code of Integrity Management of Listed OTC Companies" and the provisions of this operating procedure and behavior guide, except for the following situations, and after the relevant procedures are followed, it may be done:

1. Based on business needs, when visiting domestic (foreign) countries, receiving foreign guests, promoting business, and communicating and coordinating, in accordance with local courtesy, conventions or customs.
2. Participating in or inviting others to participate in normal social activities based on normal social etiquette, commercial purposes, or relationship promotion.
3. Invite customers or be invited to participate in specific business activities, factory visits, etc. due to business needs, and have clearly stipulated the cost bearing method, number of participants, accommodation level, and duration of the previously held activities.
4. Participate in folk festivals that are openly held and the general public is invited to participate.
5. Rewards, assistance, consolation or consolation, etc. from the supervisor.
6. The property received as a gift due to engagement, marriage, childbirth, housewarming, employment, promotion, retirement, resignation, injury, illness, or death of the person, spouse, or immediate family members shall be handled in accordance with the company's wedding and funeral regulations.
7. Others that comply with the company's regulations.

For instance, under appropriate circumstances, acceptable expenditures can include the provision of inexpensive gifts (such as Company-branded promotional items and modest gifts up to RM500 or USD110 in value), reasonable meals and entertainment.

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Article 7 (Procedures for Handling the Acceptance of Illegal Benefits)

When the staff of the company encounters that others directly or indirectly provide or promise to give the benefits stipulated in Article 4, except for the circumstances stipulated in the preceding Articles, the following procedures shall be followed:

1. If the person who provides or promises has no professional interest with him, he shall report to his immediate supervisor within three days from the date of receipt, and notify the responsible unit of the company if necessary.

2. If the person who provides or promises has an interest in his position, he shall return or refuse, and report to his immediate supervisor and inform the company's responsible unit; if it cannot be returned, it shall be returned to the company within three days from the date of receipt. Specialized unit processing. The term of having an interest in his or her position referred to in the preceding paragraph refers to a person who has one of the following circumstances:

1. Those who have business contacts, command and supervision, or expense subsidies (awards) and other relationships.

2. Those who are seeking, conducting, or have entered into contractual, sales or other contractual relationships.

3. Other decisions, execution or non-execution of the company's business will be affected favorably or adversely.

The company's dedicated unit shall, depending on the nature and value of the first interest, propose refund, payment collection, return to the public, donate to charitable organizations, or other appropriate suggestions, and report to the general manager or chairman of the board for approval before implementation.

Article 8 (Prohibition of Facilitation Payments and Handling Procedures)

The Company shall not offer or promise any facilitation payments.

If the personnel of the company provide or promise facilitation payments due to threats or intimidation, they should record the process and report to the immediate supervisor, and notify the company's dedicated unit.

After receiving the notification in the preceding paragraph, the company's dedicated unit should immediately deal with it and review the relevant situation to reduce the risk of recurrence. If any illegality is found, the judicial unit shall be notified immediately.

Article 9 (Procedures for Handling Political Contributions)

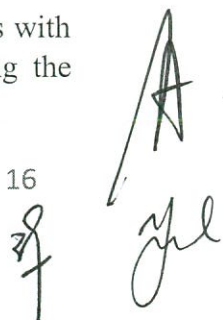
The company's political donations shall be handled in accordance with the following regulations, and shall be processed after the approval of the head of the report and notification to the company's responsible unit, and the amount shall be applied and signed in accordance with the company's approval table:

1. It should be confirmed that it complies with the relevant laws and regulations of the country where the recipient of the political donation is located, including the upper limit and form of political donation.

2. Decisions should be made in written records.

3. Political donations should be recorded in accordance with laws and regulations and accounting-related procedures.

4. When providing political donations, you should avoid engaging in business dealings with relevant government units, applying for permits, or handling other matters involving the interests of the company.

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Article 10 (Procedures for Handling Charitable Donations or Sponsorships)

Charitable donations or sponsorships provided by the company shall be handled in accordance with the following matters, and shall be processed after the approval of the head of the report and notification to the company's responsible unit, and the amount shall be applied and signed in accordance with the company's approval table:

1. It shall comply with the laws and regulations of the place of operation.
2. Decisions should be made in written records.
3. The objects of charitable donations shall be charitable institutions, and shall not be disguised bribery.
4. The feedback that can be obtained from the sponsorship is clear and reasonable, and should not be the object of business dealings with the company or anyone who has an interest in the company's personnel.
5. After charitable donation or sponsorship, it should be confirmed that the purpose of the money flow is consistent with the purpose of the donation.

Article 11 (Avoidance of Interests)

Directors, managers, and other interested parties attending or attending the board meeting who have an interest in the matters of the board meeting with themselves or the legal person they represent shall explain the important content of their interest at the current board meeting. If it is harmful to the company When interests are in danger, he shall not participate in discussions and votes, and shall avoid discussions and votes, and shall not exercise his voting rights on behalf of other directors. Directors should also be self-disciplined and have to support each other.

If a director's spouse, second degree of blood relative, or a company with which the director has a controlling affiliation relationship has an interest in the matters of the preceding meeting, it shall be deemed that the director has his own interest in the matter.

When the personnel of the company find any conflict of interest with themselves or the legal person they represent, or situations that may allow them, their spouses, parents, children, or their interested parties to obtain illegitimate benefits, they should report Relevant matters should be reported to the immediate supervisor and the company's responsible unit at the same time, and the immediate supervisor should provide appropriate guidance.

The company's personnel shall not use company resources for business activities outside the company, and shall not affect their work performance due to participation in business activities outside the company.

Article 12 (Organization and Responsibilities of The Confidentiality Mechanism)

The company's administrative management unit is responsible for formulating and implementing the company's business secrets, trademarks, patents, works and other intellectual property management, preservation, and confidentiality procedures, and should regularly review the implementation results to ensure the continuity of its operating procedures efficient. The personnel of the company shall strictly abide by the relevant operating regulations on intellectual property in the preceding paragraph, and shall not disclose the company's trade secrets, trademarks, patents, works and other intellectual property to others, and shall not inquire about or collect non-job-related company trade secrets, trademarks, Intellectual property such as patents and works.

Article 13 (Prohibition of Unfair Competition)

The Company shall engage in business activities in accordance with the Fair Trade Act and relevant competition laws, and shall not fix prices, manipulate bids, restrict production and quotas, or share or divide the market by allocating customers, suppliers, operating areas, or business types.

Article 14 (Preventing Products or Services from Damage to Stakeholders)

The company should collect and understand the relevant laws and regulations and international standards that the products and services provided should follow, and summarize the matters that should be paid attention to and make announcements to promote the company's personnel in the research and development, procurement, manufacturing, and provision of products and services. or sales process to ensure the transparency and security of information about products and services.

The company formulates and publishes the protection policy for the rights and interests of consumers or other stakeholders on the company website to prevent products or services from directly or indirectly damaging the rights, health and safety of consumers or other stakeholders. When it is reported by the media or there are sufficient facts to confirm that the company's products and services are in danger of endangering the safety and health of consumers or other stakeholders, the company should arrange to recall the batch of products or stop its services as soon as possible, and investigate whether the facts are true, and propose a review and improvement plan.

The responsible unit of the company shall report to the board of directors the matter in the preceding paragraph, its handling method and subsequent review and improvement measures.

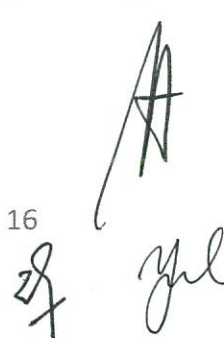
Article 15 (Prohibition of Insider Trading and Confidentiality Agreement)

The company's personnel shall abide by the provisions of the Securities and Exchange Law, and shall not use the unpublished information to engage in insider trading, nor disclose it to others, to prevent others from using the unpublished information to engage in insider trading. Other institutions or personnel involved in the company's mergers, splits, acquisitions, share transfers, important memorandums, strategic alliances, other business cooperation plans, or important contracts should sign a confidentiality agreement with the company and promise not to disclose the information they know about the company. Share commercial secrets or other important information to others, and use such information without the consent of the company.

Article 16 (Following and Declaring the Integrity Management Policy)

The company should require directors and senior management to issue a statement of compliance with the integrity management policy, and require employees to abide by the integrity management policy in terms of employment conditions.

The company should disclose its integrity management policy in internal regulations, annual reports, company website or other publicity materials, and announce it in product release conferences, legal person briefings and other external activities in due course, so that suppliers, customers or other business-related institutions and personnel All can clearly understand its integrity management philosophy and norms.

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Article 17 (Integrity Management Assessment Before Establishing Business Relationship)

Before the company establishes commercial relations with others, it should first evaluate the legitimacy of agents, suppliers, customers or other business contacts, honest management policies, and whether they have ever been involved in dishonest behavior records, so as to ensure the fairness of their business operations, transparent and will not ask for, offer or accept bribes.

When the company conducts the assessment in the preceding paragraph, it may adopt appropriate inspection procedures to examine its business contacts with regard to the following items, so as to understand their integrity management status:

1. The company's country, place of operation, organizational structure, operating policies, and place of payment.
2. Whether the enterprise has established a policy of integrity management and its implementation.
3. Whether the place where the enterprise operates belongs to a country with a high risk of corruption.
4. Whether the business of the enterprise is an industry with a high risk of bribery.
5. The long-term operating conditions and goodwill of the enterprise.
6. To consult its business partners for their opinions on the company.
7. Whether the enterprise has ever been involved in dishonest acts such as bribery or illegal political donations.

Article 18 (Explanation of The Integrity Management Policy with Business Partners)

In the process of engaging in commercial activities, the company's personnel should explain the company's honest management policy and related regulations to the transaction partner, and clearly refuse to provide directly or indirectly, promise, request or accept any form or name of illegitimate benefits.

Article 19 (Avoiding Transactions with Dishonest Operators)

The personnel of the company should avoid engaging in commercial transactions with agents, suppliers, customers, or other business partners involved in dishonest behavior. If any business contacts or cooperation partners are found to have dishonest behavior, they should immediately stop their business dealings and send It is listed as the object of refusal to implement the company's honest management policy.

Article 20 (Contract Expressly Stipulates Honest Management)

When the company signs a contract with others, it should fully understand the other party's integrity management status, and include compliance with the company's integrity management policy into the terms of the contract. At least the following items should be clearly stated in the contract:

1. When any party becomes aware that any person violates the terms of the contract prohibiting the acceptance of commissions, kickbacks or other illegitimate benefits, it shall immediately and truthfully report the identities, methods, amounts, or other illegitimate benefits of such personnel Inform the other party, provide relevant evidence and cooperate with the other party's investigation. If one party suffers damages as a result, he may claim damages from the other party, and the full amount may be deducted from the contract price payable.

2. If any party is involved in dishonest conduct in commercial activities, the other party may unconditionally terminate or rescind the contract at any time.
3. Set clear and reasonable payment content, including payment location, method, and relevant tax laws and regulations that must be complied with.

Article 21 (Handling of Company Personnel Involved in Dishonesty)

The company encourages internal and external personnel to report dishonesty or misconduct, and according to the seriousness of the report, a bonus of up to RM 600.00 will be given. If internal personnel make false reports or malicious accusations, disciplinary action should be taken if the circumstances are serious shall be dismissed.

The company establishes and announces internal independent reporting mailboxes and special lines on the company website and internal website, or entrusts other external independent organizations to provide reporting mailboxes and special lines for use by internal and external personnel of the company.

The whistleblower should at least provide the following information:

1. The name and ID number of the whistleblower. The whistleblower can also report anonymously, and the address, telephone number, and e-mail address where the whistleblower can be contacted.
2. The name of the accused person or other information sufficient to identify the identity of the accused person.
3. Specific evidence available for investigation.

The relevant personnel of the company handling the report should make a written statement to keep the identity of the reporter and the content of the report confidential, and the company promises to protect the reporter from being improperly dealt with due to the report.

The responsible unit of the company shall handle the reporting according to the following procedures:

1. Reports involving general employees should be reported to department heads, and reports involving directors or senior executives should be reported to independent directors.
2. The responsible units of the company and the supervisors or personnel reported in the preceding paragraph shall immediately ascertain the relevant facts, and provide assistance from regulatory compliance or other relevant departments when necessary.
3. If it is confirmed that the person being reported has indeed violated the relevant laws or the company's integrity management policies and regulations, he shall immediately request the person being reported to stop the relevant behavior and deal with it appropriately, and if necessary, report to the competent authority and transfer to the judicial authority Investigate, or request damages through legal procedures to protect the company's reputation and rights.
4. Report acceptance, investigation process, and investigation results shall all be kept in written form and kept for five years, and the preservation may be done electronically. Before the expiration of the storage period, if a lawsuit related to the content of the report occurs, the relevant data shall be kept until the conclusion of the lawsuit.
5. As for the reports that have been verified to be true, the relevant units of the company shall be responsible for reviewing the relevant internal control systems and operating procedures, and proposing improvement measures to prevent the same behavior from happening again.
6. The responsible unit of the company shall report to the board of directors the report, its handling method and follow-up review and improvement measures.

Article 22 (Handling of Dishonest Behavior by Others Against the Company)

If the company's personnel encounter others who engage in dishonest behavior against the company, the company should notify the judiciary and procuratorial organs of the relevant facts if their behavior involves illegal activities; if it involves public agencies or public servants, it should also notify the government's anti-corruption agency.

Article 23 (Internal Publicity, Establishment of Rewards and Punishments, Appeal System and Disciplinary Action)

The company's dedicated unit should organize an internal promotion every year, and arrange for the director, general manager, or senior management to convey the importance of integrity to directors, employees, and assignees.

The company should incorporate honest management into employee performance appraisal and human resource policies, and establish clear and effective reward and punishment and appeal systems.

The company shall dismiss or dismiss the company personnel in accordance with the relevant laws and regulations or the company's personnel regulations if the violation of integrity is serious.

The company shall disclose on the internal website information such as the title, name, date of violation, content of the violation, and handling of the person who violated the integrity.

Article 24 (Implementation)

The operating procedures and behavior guideline shall be implemented through the resolution of the board of directors, and shall be submitted to the report of the shareholders meeting; the same is true for amendments.

When submitting these operating procedures and guidelines to the board of directors for discussion, the opinions of independent directors shall be fully considered, and their objections or reservations shall be recorded in the minutes of the board meeting; if independent directors cannot attend the board meeting in person to express their objections or reservations, unless there are justifiable reasons, a written opinion shall be issued in advance and shall be recorded in the minutes of the board meeting.