



NEWTECH TECHNOLOGY HOLDING LIMITED

MANAGEMENT POLICY AND MANUAL

Policy #: NT-CP-003-OPS

Title: Anti-Bribery Policy for Vendor

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Document Version

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I. Purpose

This Policy explains the anti-bribery obligations that the external parties (the “**Vendor**”) must comply with when doing business with any companies of Newtech Technology Holdings Limited (the “**Group**”).

II. Scope

This Policy is applicable to any Vendor, including contractors, suppliers, consultants, agencies, service providers or anyone who has direct business relationship with or perform services for any subsidiary of the Group.

III. Commitments

The Group has determined that we do not and will not, pay bribes or offer improper inducements to anyone for any purpose, nor do we or will we, accept bribes or improper inducements.

The Vendor shall comply with the Group’s Anti-Bribery Policies, and local, regional or country anti-bribery laws and regulations, regardless of local business practices or social customs.

IV. Guidelines

1. Follow code of conduct

- 1) As a party doing business with the Group, you shall comply with this Policy.
- 2) The Group expects its business to be conducted with uncompromising integrity and professionalism. This expectation applies to Group employees and Vendor when conducting business or providing services on the Group’s behalf. Vendor shall read, understand and comply with the Group’s Policy in all respects.

2. No facilitation payments

A facilitation payment is a financial payment that may constitute a bribe and is made with the intention of expediting an administrative process. It is a payment made to a public or government official that is meant to be an incentive for the official to smooth or expedite certain actions or process to the benefit of the party making the payment.

The Group will NOT accept the offering of any facilitation payments and prohibits all Vendor from making any facilitation payments directly or indirectly on behalf of the Group.

3. Due Diligence

In the process of Vendor registration, the Group shall conduct due diligence checks. Vendor will be required to provide relevant documents including but not limited to valid business registration documents. We will also take reasonable risk management measures in respect of persons who perform or will perform services for or on behalf of the Group for the purpose of identifying and mitigating bribery risks.

4. Raise Concerns

Vendor is encouraged to raise any query or concerns and is obliged to report violations or suspected violations of this Policy or the anti-bribery and anti-corruption laws to our Anti-Bribery Committee at ABCCommittee@legangroup.com. You may refer to Appendix A Whistleblowing Report Template for raising enquiry/concern.

5. Whistle Blowers Protection



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- 1) The Group encourages openness and will support anyone who is acting in good faith, even if the concern/report turns out to be unsubstantiated.
- 2) The Top Management is committed in ensuring all whistle blowers an entrusted, reliable, fair and confidential handling of his/her reports.
- 3) However, if a whistleblower makes false report maliciously, with an ulterior motive, or for personal advantage, the Group reserves the right to take appropriate actions against anyone to recover any loss or damage as a result of the false report.
- 4) The Group will keep the Whistleblower's identity confidential and only disclose to relevant parties on a need-to-know basis. However, if the report leads to an investigation by regulators or authorities, it may become necessary for the Whistleblower to provide evidence or be interviewed by the relevant regulators or authorities. The Whistleblower will be advised in advance if his/her identity may become apparent or needs to be disclosed to any external parties outside the Group. In order not to jeopardize the investigation, the Whistleblower is also required to keep confidential the fact that he/she has filed a report as well as the nature of concerns and the identities of those involved.
- 5) The whistleblowers shall have the right to access or change their own personal data provided to the Committee. If you wish to exercise these rights, requests shall be made in written and email to the Committee.

V. Appendix

A. Whistleblowing Report Template

VI. Acknowledgement

We acknowledge that we have read, understood and agreed with the policy.

(Company Name & Chop)

Date:

If you have any questions or concerns, you may visit our website or contact Anti-Bribery Committee for more information.