



# Newtech Technology Holdings Limited

## MANAGEMENT POLICY AND MANUAL

Policy #: NT-CP-016-OPS

Title: Supplier Code of Conduct

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### I. Introduction and Purpose

Newtech Technology Holdings Limited (the “**Company**”) is committed to doing everything we can to minimise, control and reduce our impact on the environment and make a positive influence in the communities where we live and work. Our success is based on our relationships with business partners, customers and peers in a dynamic and evolving global landscape.

The Company’s Supplier Code of Conduct (“Code”) outlines the high expectations of ourselves and our supplier partners. While we recognise there are different legal and cultural environments in which our suppliers operate, we are committed to applying our Code across all aspects of our operations. Our goal is to evaluate performance fairly and consistently in our supply chain and to support continuous improvement activities. We believe that partnerships based on transparency and collaboration will promote responsible and sustainable practices that serve future generations.

### II. Scope and Responsibilities

#### i. Legal Compliance

Supplier and contract partners respect and comply with applicable laws related to both labor and environmental practices. When differences or conflicts in the law and Code arise, adherence to the highest standard is expected.

#### ii. Bribery and Corruption

Suppliers will have policies, codes of conduct and procedures in place to avoid all forms of bribery, corruption and fraud and ensure they are enforced.

For details, please refer to the Anti-Bribery Policy for Vendor (NT-CP-004-OPS).

#### iii. Unfair Business Practices

Suppliers must not engage in any illegal anti-competitive conduct or deceptive trade practice for any reason whatsoever, whether on behalf of the Company or others. Suppliers must never rig bids, fix prices, or provide or exchange sensitive information (including but not limited to price, cost and technical data) with the Company’s competitors or suppliers. Suppliers must also refrain from abusing their market power, whether for their benefit or the benefit of others.

#### iv. Dignity, Respect and Fairness

Workers, irrespective of their nationality, gender, ethnicity, social and legal status, race, religion, or other protected status, are treated with dignity, respect, and fairness and are not subject to harassment, discrimination, abuse or degrading treatment.

#### v. Child Labor

Suppliers will not employ anyone under the age of 15 or the local legal minimum age to work, whichever is more stringent, nor will any worker be employed below the minimum age to complete compulsory education. Young workers, defined as those between the minimum age for employment and 18, must not be assigned to hazardous, unsafe or unhealthy working job functions.

#### vi. Forced Labor and Recruitment

Workers are not subject to forced, coerced, trafficked, bonded, or involuntary labor. Workers have freedom of movement outside regular working hours unless there are legitimate safety or security issues that might threaten the workers’ health, safety or well-being. The Company should recruit workers through ethical and legal means whereby all recruitment is free from all forms of involuntary labour, slavery, and trafficking.



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vii. Hours of Work

Workers are not permitted to work more than the regular and/or overtime hours allowed by local law and are provided the legally mandated weekly rest period. All overtime work is consensual and free from reprisal if declined.

viii. Health and safety

Workers have a safe and healthy work environment, subject to a robust health and safety management system that is compliant with all governing health and safety laws and regulations and is aligned with applicable international standards and industry best-practices.

ix. Respect for the Environment

We do business with suppliers who share our vision and commitment to preserving the environment. Suppliers must have policies and procedures in place to manage and minimise their environmental impacts. This includes the cautious consumption of resources such as electricity and water, recycling of resources such as heat, water, recyclable materials, upcycling of resources, restriction of emission of greenhouse gas and minimizing the pollution of air and water as well as limiting the pollution of environment through light and noise. Additionally, suppliers must meet all requirements related to chemical restrictions, labelling, handling and storage of approved substances while preventing or mitigating the release of chemicals and hazardous materials.

x. Community

The Company encourages and aligns with suppliers who are engaged in their communities. By investing in infrastructure and creating educational opportunities, we take a leadership position alongside our suppliers in promoting social development in the communities where we work and live.

### III. Review of Policy

This policy will be updated from time to time whenever there are critical developments regarding legislation and the industry's best practices. In any event, reviewed once every three years or at such earlier time as appropriate by ESG Committee.

### IV. Acknowledgement

Any significant changes to the Policy will be disclosed to every stakeholder (both internal and external).