



# SUPPLIER

## Code Of Conduct

Effective date: April 1, 2024

# ABOUT

At Greatech, we conduct our business based on principles of ethics and responsibility that are reflected in every part of our operations. This Code of Conduct for Supplier ("Supplier Code") outlines our expectations for suppliers regarding basic ethical and moral principles related to sustainability. Suppliers are expected to align with our commitment to conduct business with integrity, transparency and respect for ethical standards. Adherence to this Supplier Code is crucial for fostering a sustainable and responsible supply chain that upholds the values of Greatech.

Supplier Code Of Conduct

# HUMAN RIGHTS

## Human Rights

Suppliers shall respect the fundamental workers' rights as outlined in the International Labour Organisation ("ILO") conventions. It is imperative that suppliers conduct their business operations with utmost respect for human rights of all individuals.

Greatech does not accept any form of forced labour or child labour and human trafficking are strictly prohibited. Suppliers must ensure that their activities do not violate the rights and dignity of any individual. Greatech values diversity, inclusivity and the well-being of all individuals involved in our supply chain, and we expect our suppliers to share and uphold these same principles in their own operations. Compliance with human rights principles is essential for fostering a sustainable and responsible supply chain that respects the dignity and rights of all individuals.

## Diversity and Equality

Greatech is firmly committed to fostering a workplace environment free from discrimination of any kind. Suppliers are expected to treat all individuals with respect, dignity and fairness, regardless of race, colour, gender, religion, age, sexual orientation, disability or any other characteristic protected by law. Discriminatory practices, including but not limited to harassment, bullying or unequal treatment, are strictly prohibited within our supply chain. We expect suppliers to promote a culture of inclusivity and diversity, where every individual is valued and afforded equal opportunities for growth and advancement. Greatech believes in the importance of creating a work environment that celebrates differences and encourages collaboration among people from diverse backgrounds. Upholding the principle of no discrimination is integral to building a sustainable and ethical supply chain that values the contributions and uniqueness of all individuals involved.

Supplier Code Of Conduct

# WORKING CONDITION

## Freedom of Association

The suppliers' employees must have the freedom to form, join or opt not to join trade unions and engage in collective bargaining discussions without the threat of discrimination, violence or harassment, whether physical or psychological. Greatech anticipates that suppliers, under their management, will foster an environment conducive to open dialogue on working conditions, enabling employees to voice concerns and complaints without the fear of retaliation.

## Safe and Respectful Workplace

Greatech maintains a zero-tolerance policy towards harassment of any kind. Suppliers are required to provide a workplace environment that is free from all forms of harassment, including but not limited to verbal, physical, sexual or psychological harassment. It is essential that all individuals within the supply chain are treated with respect, dignity and professionalism at all times. Harassment, intimidation or any form of unwelcome behaviour that creates a hostile or offensive work environment is strictly prohibited. Greatech expects suppliers to implement clear policies and procedures to prevent and address harassment issues promptly and effectively. Any complaints or concerns related to harassment must be taken seriously, thoroughly investigated and resolved in a timely manner. By fostering a culture of respect and inclusivity, we aim to create a safe and supportive work environment for all individuals within our supply chain.

## Supplier Code Of Conduct

### Health and Safety

Suppliers must prioritise the health and safety of their employees, customers and the community. This includes providing a safe working environment, ensuring proper training on health and safety procedures, and complying with all relevant laws and regulations. Suppliers should regularly assess risks, implement measures to mitigate hazards and promote a culture of safety throughout their operations. Any incidents or near misses must be promptly reported and investigated to prevent recurrence. Continuous improvement in health and safety performance is vital, and suppliers are encouraged to collaborate with us to enhance health and safety standards across the supply chain.

Supplier Code Of Conduct

## Labour Law and Wages

The supplier must adhere to labour laws in the jurisdictions where it operates and uphold minimum wage requirements, along with following regulations on working hours, leave entitlement and mandated benefits.



# **MANAGEMENT OF CONFIDENTIAL INFORMATION**

## **Security and Confidentiality**

Greatech places a high priority on security and expects suppliers to prioritize the protection of information, assets and personnel. Suppliers are required to implement robust security measures to safeguard against unauthorised access, theft, loss, or damage to sensitive data, materials and facilities. It is essential that suppliers comply with all relevant security regulations and standards to ensure the integrity and confidentiality of information. Access to company resources should be restricted to authorised personnel only, and suppliers must maintain strict control over physical and digital security risks. Greatech expects suppliers to regularly review and update their security protocols to mitigate potential threats and vulnerabilities. By prioritising security measures and promoting a culture of vigilance, suppliers can contribute to a secure and resilient supply chain that upholds the trust and confidence of all stakeholders.

Supplier Code Of Conduct

# ENVIRONMENT

## Environmental Stewardship

Greatech is committed to promoting environmental sustainability and expects suppliers to prioritise eco-friendly practices in their operations. Suppliers are required to comply with all applicable environmental laws and regulations, as well as strive to minimise their environmental impact through resource conservation, waste reduction and pollution prevention. It is essential for suppliers to implement sustainable practices such as energy efficiency, recycling, and responsible sourcing of materials. Greatech encourages suppliers to continually improve their environmental performance and seek opportunities to reduce their carbon footprint. By working together to protect the environment, suppliers can contribute to a greener supply chain and support Greatech's commitment to sustainability and corporate responsibility.

Supplier Code Of Conduct

# CORPORATE ETHICS

## Bribery and Anti-Corruption

Greatech strictly prohibit any form of bribery, fraud, or corruption in all business activities. Suppliers are expected to conduct their operations with honesty, integrity, and transparency and to comply with all anti-corruption laws and regulations. Non-compliance with anti-corruption laws can result in serious consequences, and suppliers must establish adequate procedures to ensure their own compliance. Bribery, kickbacks, or any other unethical practices are not tolerated, and any supplier found engaging in such activities will face immediate termination of the business relationship.

Gift or benefits offered to Greatech employee by a supplier is typically not allowable if it affects or risks affecting the employee's objectivity and ability to make commercially sound decisions.

Supplier Code Of Conduct

## Bribery and Anti-Corruption

We expect our suppliers to maintain accurate records, provide truthful information, and report any suspicious behaviour or concerns related to bribery and corruption.

Upholding these principles is essential for fostering a culture of trust, accountability, and ethical behaviour within our supply chain.

## Conflicts of Interest

Greatech emphasises the importance of transparency and integrity in all business dealings and expects suppliers to avoid any conflicts of interest that may compromise ethical standards or business decisions. Suppliers are required to prevent and disclose any situations where personal, financial or other interests could conflict with their obligations to Greatech. It is crucial that suppliers act in the best interests of Greatech and avoid engaging in activities that could create real or perceived conflicts of interest. This includes refraining from accepting gifts, favours or other forms of undue influence that could sway business decisions. Greatech expects suppliers to maintain the highest level of ethical conduct and to promptly disclose any conflicts of interest that may arise. By upholding principles of honesty, fairness and accountability, suppliers can help foster a trustworthy and ethical business environment within our supply chain.

## Supplier Code Of Conduct

### Fair Competition

Suppliers are required to uphold fair business practices in accordance with all relevant fair competition and antitrust laws and regulations. Suppliers must refrain from participating in any anti-competitive behaviours or agreements, such as predatory pricing, price-fixing, dumping, territorial division, patent misuse and unjustified refusal to supply.

## Supplier Code Of Conduct

### Physical and Intellectual Property

Suppliers are required to uphold and safeguards both physical and intellectual property rights within the supply chain. This includes protecting Greatech's physical assets from loss, theft or unauthorised use, as well as respecting and preserving intellectual property rights throughout the supply chain.

## Conflict Minerals

Suppliers are required to adhere to our policy on conflict minerals, which aims to prevent the use of minerals sourced from conflict-affected regions, where revenues may fuel human rights abuses and armed conflict. Suppliers must provide accurate and transparent information on the origin of minerals used in their products, ensuring they are not sourced from conflict-affected areas. Suppliers are expected to conduct due diligence on their supply chains to trace the source of minerals and comply with international standards such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Collaboration with us to support responsible mineral sourcing practices is essential, and any concerns regarding conflict minerals should be reported promptly for investigation and resolution.



## Export Control Compliance

Suppliers must comply with all applicable export control laws and sanctions, including those from Malaysia, the United Nations, the United States, and the European Union. Suppliers guarantee that products and services provided to Greatech are not sourced, directly or indirectly from sanctioned countries, entities or individuals; and are not subject to any restriction that would prevent their sale, export, transfer or use by Greatech or its affiliates.

Greatech does not support military or terrorist activities and will not accept goods or services with end-user restrictions.

Suppliers are responsible for ongoing compliance and must obtain the necessary export licenses. Any concerns regarding export restrictions must be notified Greatech in writing immediately. Breaches may result in suspension or termination of the business relationship.

## Supplier Integrity and Compliance Expectations

In order to ensure legal compliance and ethical business practices, all suppliers are expected to adhere to the highest standards of integrity and transparency in their operations. Suppliers must comply with all applicable laws, regulations, and industry standards, including but not limited to those related to labour practices, environmental protection, anti-corruption and data privacy. Suppliers are required to conduct their business in a manner that upholds human rights, promotes fair labour practices, safeguards the environment and prohibits any form of discrimination, harassment or unethical behaviour.

## Supplier Integrity and Compliance Expectations

Greatech reserves the right to employ appropriate measures to verify compliance with this Supplier Code, which may include questionnaires, evaluations or on-site supplier audits in collaboration with supplier representatives. Should any deviations from the principles outlined in this Supplier Code be identified, Greatech may give the supplier a reasonable opportunity to respond with proposed corrective actions. The supplier is responsible for executing these actions at their own expense, without imposing financial burdens on Greatech.

## Supplier Code Of Conduct

### Reporting Concerns

We encourage our suppliers to promptly raise any concerns regarding our business practices or potential violations of our Supplier Code directly with their primary contact in Greatech. If that is not feasible, please contact Greatech's Corporate Affairs Department at [info@greatech-group.com](mailto:info@greatech-group.com). We are unwavering in our commitment to maintaining confidentiality and will not tolerate any form of reprisals or retaliation against individuals who, in good faith, seek advice or report any concerns regarding questionable behaviour or possible breaches of this Supplier Code.