



## CODE OF BUSINESS CONDUCT AND ETHICS

Aztech Global Ltd and its subsidiaries (hereinafter collectively referred to as “**Aztech**”) is a full-fledged electronics design, engineering and manufacturing solutions provider for Internet-of-Things devices and electronic products.

Aztech’s **vision** and **mission** are delighting people with smarter solutions.

Aztech’s **values** encapsulate the culture that Aztech desires to build:

- **Integrity** is doing the right thing even when it is not easy
- **Commitment** transforms a promise into a reality
- The pursuit of **Excellence** is a wholehearted endeavour

Aztech **promises** to deliver value beyond expectations and to empower brand owners to achieve their product aspirations.

### 1.0 PURPOSE AND SCOPE

This Code of Business Conduct and Ethics (“**Code**”) applies to the Directors, Management, Employees, Subsidiaries of Aztech (each a “**Relevant Individual**” and collectively, “**Relevant Individuals**”). This Code provides guidance in resolving any ethical issues that one may encounter in conducting business and sets out the standards of behaviour expected of all Relevant Individuals in line with Aztech’s vision, mission, values and promises.

If a local law conflicts with a provision of this Code, the local law shall prevail. If a local custom or practice conflicts with a provision of this Code, the provision of this Code shall prevail.

This Code shall by no means be exhaustive nor encompass all the policies of Aztech. The Code provides general guidance for resolving a variety of legal and ethical issues. All Relevant Individuals are also expected to comply with other applicable policies, procedures, guidelines, directives, rules and practices issued by Aztech, apply sound judgment in deciding on ethical means of dealing with any given situation involving Customers, Business Partners, Aztech’s competitors, regulators, the public and any Aztech matters in general and seek help when needed. This Code may be reviewed, changed and updated from time to time.

### 2.0 RESPONSIBILITY AND COMPLIANCE WITH THE CODE

Every Relevant Individual shall be responsible for complying with the Code as may be amended or updated from time to time. It is also each Relevant Individual’s responsibility to report violations or suspected violations of this Code and support the implementation of this Code. Any violation or suspected violation of this Code shall be reported to the Chief Executive Officer (CEO) (in the case of any Director) or the Head of Legal (in all other cases) or such other officer designated by the Company from time to time or email to [whistleblower@aztech.com](mailto:whistleblower@aztech.com).

Non-compliance with this Code will be treated seriously and may result in disciplinary action, including the possibility of suspension or dismissal, and if warranted, legal proceedings against the Relevant Individual. Violation of applicable laws may subject the Relevant Individual to civil and/or criminal penalties imposed by a governmental agency or a court, in addition to disciplinary action.

**3.0 THE CODE****1) Data Integrity, Privacy and Protection**

All Relevant Individuals must comply with Aztech's Personal Data Protection Policy.

**2) Ethics****a. Accepting and Providing Gifts and Other Benefits**

- All benefits and gifts received are to be declared to the Human Resources Department.
- The practice of giving business gifts and taking part in corporate entertainment varies between countries, regions and industries and a practice considered normal and acceptable in one country, region or industry may not be considered normal and acceptable in another.
- All Relevant Individuals are to bear in mind that what may viewed as small or insignificant in one country can be significant in another.
- Giving of gifts and corporate hospitality or entertainment is not prohibited if it is not done with the intention of influencing others, obtaining or retaining a business advantage, if it is given openly and not offered to public officials, and if it complies with any applicable laws.

**b. Business Integrity**

- Aztech will engage with its competitors when there is a legitimate business reason to do so.
- Aztech will not exchange information with or enter into agreements with a third party in any way that improperly influences the third party.
- Aztech shall comply with the prevailing competition/anti-trust laws in the countries in which it operates.

**c. Bribery and Corruption**

- Aztech has zero-tolerance for bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates, upholding all laws relevant to countering bribery and corruption in each of the jurisdictions in which it operates and implementing and enforcing effective systems to counter bribery and corruption.
- Relevant Individuals shall not offer, give, solicit or accept any bribes in order to achieve any business or personal advantage for themselves or others or engage in any transaction that contravenes any applicable anti-bribery or anti-corruption laws.

**d. Complaints and Whistle-blower**

- Aztech shall ensure the confidentiality and protection of the identity of any whistle-blower.
  - Aztech shall ensure complaints are taken seriously.
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**e. Intellectual Property**

- Employees must not remove Aztech's physical assets or properties from its premises without permission from Aztech or use such assets or property for any inappropriate purpose.

**f. Money Laundering**

- Employees shall ensure that they conduct business with reputable customers for legitimate business purposes and with legitimate funds.
- Employees who suspect any money laundering activities shall report such activities to their supervisor immediately.

**g. Providing Information**

Relevant Individuals shall:

- Communicate information accurately, effectively and in a proper manner;
- Comply with the statutory and regulatory requirements relating to the confidentiality of information;
- Disclose information regarding business in accordance with applicable regulations and industry practices;
- Not falsify and/or misrepresent any information;
- Protect Aztech's confidential information against unauthorised disclosure or use;
- Protect confidential information of third parties which they have access to in the course of their work; and
- Not disclose confidential information for any unauthorised purpose.

**h. Research and Development**

Employees shall:

- Comply with statutory and regulatory requirements relating to research and development;
  - Ensure that information from research is recorded and stored in a way that complies with applicable data protection laws and enables accurate and transparent reporting; and
  - Ensure that research proposals are ethically and scientifically reviewed in line with current laws and regulations and that all relevant internal review and approval procedures are followed.
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### 3) Environment Protection and Management

Aztech actively participates in energy saving and waste reduction programmes.

Aztech continuously seeks to improve the sustainability of its activities by economising its use of non-renewable energy and raw minerals, minimising the amount of waste generated and minimising any adverse environmental impact associated with its products.

Aztech will endeavour to identify, mitigate and monitor existing and emerging risks to the environment associated with its business activities.

### 4) Labour and Human Rights

#### a. Employment

- Aztech complies with all related laws in its employment decisions.
- Every term of a contract between Aztech and its employees is consensual.
- Aztech does not provide a contract of service to any person below the age of 18 years.

#### b. Human Rights

- Aztech is committed to upholding the human rights of its employees and treating its employees with dignity and respect.
- Aztech supports the U.N. Guiding Principles for Human Rights.

#### c. Equal Opportunity and Non-Discrimination

- Aztech treats its employees and job applicants fairly and does not engage in any form of unlawful discrimination. Aztech provides equal opportunities based on merit, qualification and the ability to perform the relevant duties.
- Aztech is committed to ensuring that no individuals receive less than favourable treatment or are discriminated against based on age, citizenship, colour, disability, gender identity, marital status, nationality, race, religion, sexual orientation or any other legally protected factor.
- Aztech aims to provide a work environment that fosters fairness and respect for social and cultural diversity that is free from unlawful discrimination as determined by current and future legislation.

#### d. Salary

- Aztech is committed to fair pay and transparent compensation principles.

#### e. Working Hours

- Working hours, excluding overtime, shall be defined by contract and be in compliance with all applicable local employment laws and regulations.
  - Every employee is allowed to have a rest day each week without pay for that day, on a Sunday or such other day as agreed.
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**5) Management System****a. Company's Commitment**

- Aztech strives to comply with all prevailing statutory, company policies and regulatory requirements.
- Aztech encourages employees to improve efficiency and enhance the competitive position of Aztech.

**b. Communication**

- Aztech has established, implemented and maintained a procedure for internal communication links between employees which is available on Aztech's Intranet Portal.

**c. Control of Documents**

- Records are established and maintained to provide evidence of compliance with requirements and effective operation of the Code.

**d. Employees' Feedback**

- Aztech will review employees' feedback on the Code and update the Code where relevant.

**e. Legal and Regulatory Requirements**

Aztech shall:

- Establish, implement and maintain procedures to identify and track legal and regulatory requirements;
- Keep track of changes in legal regulatory requirements; and
- Communicate the applicable legal requirements to the relevant departments.

**f. Operational Control**

Aztech shall:

- Identify operations and activities that present risks and the control measures to be adopted to mitigate such risks;
  - Establish, implement and maintain documented procedures related to goods, equipment and services;
  - Establish, implement and maintain procedures for workplace processes such as the installation and operation, of machinery; and
  - Stipulate operating criteria in the procedures.
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### **g. Training**

- Training on this Code forms part of the induction process for all new employees.
- All existing employees will receive regular, relevant training on how to comply with this Code.

## **6) Workplace Culture**

### **a. Alcohol, Drugs and Prohibited Substances**

- Employees are expected to perform their duties free from the influence of any substances that could impair their job performance or pose an unacceptable safety risk to them and others working around them.
- Aztech prohibits employees working under the influence of alcohol, illegal drugs and controlled substances on its premises.
- Aztech prohibits the distribution, possession and sale of alcohol, illegal drugs and controlled substances in the premises.

### **b. Harassment, Threats and Violence**

- Aztech seeks to provide a safe work environment where employees are treated with respect and are free from any form of harassment, threat, intimidation, violence and any other inappropriate behaviour.
- Each employee is responsible for reporting any harassment, threat, intimidation, violence and any other inappropriate behaviour which he/she is subjected to, is a witness of, or has any knowledge of.

## **7) Workplace Safety and Health**

### **a. Aztech will protect the safety and health of its employees by:**

- Conducting a risk assessment to identify hazards and implement effective risk control measures;
  - Complying with the relevant statutory and regulatory requirements;
  - Ensuring workers are provided with sufficient instruction, training and supervision so that they can work safely;
  - Developing and implementing systems for dealing with emergencies;
  - Making sure the work environment is safe;
  - Ensuring the implementation of adequate safety measures in relation to the use of any machinery, equipment, plant, article or process at the workplace; and
  - Supporting policies that contribute towards safety and health and ensuring that these policies are implemented in the workplace.
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### b. Employees must:

- Adhere to Aztech's workplace safety and health system and any safe work procedures and safety rules implemented at the workplace;
- Not engage in any unsafe or negligent act that may endanger themselves or others working around them;
- Use personal protective equipment provided to them to ensure their safety while working; and
- Not tamper with or misuse any workplace equipment.

### c. Emergency Preparedness and Response

- Aztech shall prepare, manage and as necessary, execute, a systematic Emergency Response Plan.
- Aztech shall ensure that emergencies are identified and prevention and response procedures are established and maintained.
- The Emergency Response Team shall remain alert and accessible at all times and respond promptly when a situation requiring their action arises.
- Employees are personally responsible for familiarising themselves with and adhering to Aztech's emergency response procedures.

## 8) Conflict of Interest

Relevant Individuals must act in the best interest of Aztech at all times.

Relevant Individuals are expected to avoid personal activities and financial interests which could cause a conflict of interest with their responsibilities in Aztech.

Relevant Individuals must not misuse their position for their own personal gain.

In the event a Relevant Individual thinks that he/she has an actual or potential conflict of interest, he/she must immediately disclose the conflict of interest to the CEO (for Directors) or his/her immediate supervisor (in all other cases) who will determine the best way to manage the situation.

Any failure to comply with the Code, policies or the law and regulations of the country in which the Relevant Individual is in may result in Aztech and/or the relevant government authorities commencing investigation of/ taking the appropriate action against that Relevant Individual.

## 4.0 HOW TO RAISE A CONCERN

Relevant Individuals are encouraged to raise concerns about any issue or suspicion of malpractice in accordance with this Code at the earliest possible stage. Relevant Individuals who have any other queries should raise them with the Head of Legal or send them via email to [whistleblower@aztech.com](mailto:whistleblower@aztech.com).

Aztech values the help of Relevant Individuals in identifying potential violations of this Code and any applicable laws or regulations. Aztech prohibits any threats, reprisals or retaliation of any kind against anyone who reports, in good faith, an actual or suspected violation of the law, this Code, or any of Aztech's other policies, or who cooperates or assists in an investigation related to

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reported violations. Aztech reserves the right to discipline Relevant Individuals who knowingly provide false information or make false accusations.

## **5.0 MONITORING AND REVIEW**

All Relevant Individuals are responsible for ensuring the effective implementation of this Code and disclosing any suspected danger, wrongdoing or breach of the Code.

The Head of Legal will regularly monitor and review the implementation of, compliance with, and the suitability, adequacy and effectiveness of this Code and report on the same to the CEO. Aztech's internal control systems and procedures will also be subject to regular audits to provide assurance that this Code is effective.

All Relevant Individuals are invited to comment on this Code and suggest improvements to this Code. Comments, suggestions and queries should be addressed to the Head of Legal. This Code may be revised at any time as necessary. All Relevant Individuals will be fully informed of any material revisions to this Code.

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