

Anti-Bribery and Anti-Corruption Policy

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1. EMPLOYEE ACKNOWLEDGMENT

I.....
 hereby acknowledge receipt of JF Technology Bhd (and all its subsidiaries, JF Microtechnology Sdn Bhd, J Foong Technologies Sdn Bhd & JF International Sdn Bhd, collectively referred to as the “Company”) Anti-Bribery and Anti-Corruption Policy and have read its contents.

It is my understanding that the Anti-Bribery and Anti-Corruption Policy contains guidelines, policies and best practices of the company covering some of our most important individual responsibilities and obligations as we go about our work and I confirm that I will abide by the Policy.

Signature : _____

Full Name : _____

Designation : _____

Date : _____

The signed original copy of this acknowledgement form shall be kept inside each employee personal file.

This Policy is the property of the Company and shall be shared via all company electronic media and hard copy will be place at all notice board and General Office for any employee to refer to.

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2. POLICY STATEMENT

JF Technology Berhad with all its subsidiaries (**JF Microtechnology Sdn Bhd, J Foong Technologies Sdn Bhd** and **JF International Sdn Bhd**, collectively referred to as the “Company”) are committed to maintaining the highest standards of ethics and integrity in the way we do business around the world.

This **Anti-Bribery and Anti-Corruption Policy** (the “Policy”) contains policies and guidelines relating to the standards and ethics that all employees are expected to adhere to in the course of their work.

The Policy is not intended to be the one-stop centre for all definitive answers. Rather, it is intended as an introduction to our employees, as well to the public at large, of the Group’s commitment to combat bribery and corruption.

“ALWAYS ASK WHENEVER IN DOUBT”

The Company reserves the right to amend, delete or augment any provision in this Policy and other Policies as and when it deems necessary.

All policy changes shall be approved by the Board of Directors.

3. WHO MUST COMPLY

This policy applies to all individuals working for JF Technology Bhd with all of its subsidiaries and affiliates anywhere in the world (collectively referred to as the “**Company**”) and at all levels and grades.

This includes (Board members, employees, agents, vendors, contractors, suppliers, consultants, senior managers, officers, directors, employees (whether regular, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home-workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as “**employees**” in this policy).

4. PERSONAL CONFLICT OF INTEREST

Conflicts of interest can arise if individuals have a personal interest in business dealings involving the company. Personal interest can be direct or indirect, and refers not only to personal interests but to those of family members and friends.

An employee is also not permitted to engage in any activity, which can be detrimental, directly or indirectly, to the interest of the Company. Employees must disclose any personal conflict of interest or perceived conflict to the Human Resource Department or the CEO.

5. TRANSACTIONS WITH CUSTOMERS, SUPPLIERS, VENDORS AND OTHERS

The Company is committed to dealing fairly and honestly with its customers, suppliers and vendors. Employees are expected to conduct the Company’s business with such parties in a respectful, fair, and honest manner.

Employees are not to offer or accept any benefits, rewards or things of value from customers, which may violate the law, the customer's policies, or our business practices.

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6. GIFTS, ENTERTAINMENT AND HOSPITALITY

6 (a) 'NO GIFT' POLICY

The Company adopts a "No Gift" Policy whereby, subject only to certain narrow exceptions, the Company employees, family members or agents acting for or on behalf of the Company employees or their family members are prohibited from, directly or indirectly, receive or provide gifts.

The Company requires employees to abide by this policy to avoid conflict of interest or the appearance of conflict of interest for either party in on-going or potential business dealing between the Company and external parties as a gift can be seen as a bribe that may tarnish the Company's reputation or be in violation of anti-bribery and corruption laws.

6 (b) RECEIVING GIFTS

Token gifts of nominal value normally bearing company's logo or (e.g. t-shirts, pens, diaries, calendars and other small promotional items) that are given out equally to members of the public, delegates, customers, partners and key stakeholders attending events such as conferences, exhibitions, training, trade shows etc. and deemed as part of the company's brand building or promotional activities may be accepted and when in doubt about the value of the token gift, please report to HR or the CEO.

However, employees may receive personal gifts of no more than **RM 500.00 (Five Hundred Ringgit)** from colleagues in certain circumstances such as in conjunction with engagement, marriage, retirement, new born baby and other celebrations that are deemed appropriate. If the employee still has query with the gift received, you can refer to Human Resources Department for verification.

6 (c) PROVIDING GIFTS

Generally, employees are not allowed to provide gifts to third parties with the exception of the Group MD/CEO and Heads of Department and any other officers identified by the Group MD/CEO.

7. DONATION AND SPONSORSHIPS

Employees are prohibited from acting on the below without first obtaining approval from CEO or Board Members:

- i) using their position with the Company to try to influence any other person (whether or not employed by the Company) to make political contributions or to support politicians or their parties in any country;
- ii) make any contribution or incur any expenditure using the Company resources to benefit any political campaign, party or politician in any country;
- iii) the use of Company facilities, equipment and resources for any political campaign or party functions.

The Company may make Charitable donations but only if they are ethical and in compliance with this policy and local applicable laws.

8. FACILITATION PAYMENTS OR KICKBACKS

The Company prohibits accepting or obtaining, either directly or indirectly, facilitation payments from any person for the benefit of the employee himself or for any other person who is subject to the 'Policy'. All persons subject to the Policy must not offer, promise, give, request, accept or receive anything which might reasonably be regarded as a facilitation payment.

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9. RESPONSIBILITIES OF EMPLOYEES

Employees must ensure that they have read and understood this policy and, must at all times comply with the terms and conditions of this policy. Any employee who breaches any of the terms of this policy will face disciplinary action, which could result in dismissal for gross misconduct.

10. RAISING A CONCERNS OR COMPLAINT

Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, you should raise the matter with the Human Resource department or the CEO.

11. PROTECTION

The Company is committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in corruption, or because of reporting concerns under this policy in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any detrimental treatment as a result of refusing to take part in corruption, or because of reporting concerns under this policy in good faith, you should inform the Human Resources Department or the CEO of the Company immediately.

If the matter is not remedied, you should raise the matter by following the procedure laid out in the **Whistle Blower Policy**

12. WHO IS RESPONSIBLE FOR THE POLICY

The Board Members has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The head of the Human Resources Department has the responsibility for implementing this policy.

Management at all levels are responsible for ensuring that those reporting to them are made aware of and understand this policy.

13. TRAINING AND COMMUNICATION

Dissemination of this policy for new joiners shall be carried out at the time of induction. This policy will also be shared with all existing employees. All employees may be required to participate in anti-corruption education and training sessions.

The Company's zero-tolerance approach to bribery and corruption should be communicated to all agents, suppliers, contractors and business partners at the outset of the Company's business relationship with them and as appropriate thereafter.

14. MONITORING AND REVIEW

The Board Members will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvement identified will be made and incorporated as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.