



OTEC ENGINEERING COMPLIANCE POLICY

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Chapter I General Provisions

Article 1 In order to regulate the company's business operation behavior, strengthen the standardization and institutionalization of the internal control mechanism, establish the business philosophy of honesty and trustworthiness, law-abiding and integrity, quality service as the core, effectively maintain the company's good image and reputation, establish the company's long-term warning mechanism to govern commercial bribery and corruption, and protect the interests of the company, these rules are formulated in accordance with relevant laws and regulations.

Article 2 The rules apply to all the company's external economic transactions, including but not limited to marketing and procurement.

Article 3 These rules are applicable to all employees and stakeholders of the company, i.e. all customers, suppliers, service providers and contractors who have business dealings with the company.

Article 4 The purpose of anti-bribery and anti-corruption of commercial bribery.

4.1 To prevent and control corrupt acts of commercial bribery, regulate the behavior of the company's employees and stakeholders, prevent legal risks, and protect the long-term development of the company.

4.2 To further improve the construction of the company's anti-bribery related system and raise the legal awareness of employees.

4.3 To improve the quality of employees, consciously prevent and resist commercial bribery, and maintain the image and reputation of the company.

Article 5 The prevention and control of commercial bribery management follows the principle of unified leadership, hierarchical responsibility, strict organization and comprehensive management.

Chapter II Prohibition of commercial bribery

Article 6 Commercial bribery is an act of unfair competition in which cash, in-kind and other benefits are given or received directly or indirectly in various names such as kickbacks, promotion fees, publicity fees, labor fees, reimbursement of various expenses, provision of domestic and overseas travel, etc., for the purpose of obtaining business transaction opportunities outside the transaction.



Article 7 The following acts are prohibited in any external commercial activities of the Division.

- 7.1 Giving or soliciting cash or goods from other party and its related personnel in the form of attachments in violation of the regulations.
- 7.2 Obtaining transactions, service opportunities, preferential terms or other economic benefits by giving property in the name of donation.
- 7.3 Providing commercial sponsorship or travel and other activities that violate the principle of fair competition.
- 7.4 The provision of various membership cards, consumer cards (coupons), shopping cards (coupons) and other valuable securities.
- 7.5 Provision and use of housing, cars and other items.
- 7.6 Provision of gratuitously transferred shares or dividends.
- 7.7 Through gambling, as well as under the guise of promotional fees, publicity, advertising, training fees, consultancy fees, consulting fees, technical service fees, scientific research fees, clinical fees, etc. to give, receive property or other benefits.
- 7.8 Other violations of laws and regulations.

Article 8 Main content of anti-bribery anti-corruption activities:

- 8.1 Establishment of leading department to combat commercial bribery.
- 8.2 Establishment of the prevention of commercial bribery reporting mail-box, and the publication of the reporting telephone.
- 8.3 In the implementation of anti-bribery and anti-corruption process, the company managers carry out inspections and unannounced visits to other departments, timely collecting clue of commercial bribery, studying of countermeasures and measures to carry out the prevention of commercial bribery.
- 8.4 To carry out investigation and research, grasp the characteristics and laws of corrupt behavior and commercial bribery, research and propose specific countermeasures and measures in education, supervision and other effective prevention, and promptly solve the seedy and tendency problems.



- 8.5 Establish a system of reporting and evaluation of prevention and control of commercial bribery. Such as the general manager reports and comments on the prevention and control of commercial bribery activities, the review of the work of the leading cadres.

Chapter III Management Responsibilities

Article 9 The general manager as the direct leader of the company's business management, its main responsibilities:

- 9.1 To organize the company's management team to study and master the relevant national anti-bribery policies and documents, and use them to guide the business activities of the company.
- 9.2 To guide each department to further improve the internal control system and establish the modern management concept of governing the company according to the law and scientific management of the company.
- 9.3 Regularly listen to the work of each department in the governance of commercial bribery and evaluate it in conjunction with the general manager's general meeting.
- 9.4 To strengthen the staffing of the company's commercial bribery problems in a timely manner, and supervise the self-correction of the commercial bribery and corruption control office.

Article 10 Set up the Office of Prevention and Control of Commercial Bribery, as the supervision and management of the commitment system to prevent commercial bribery, its main responsibilities.

- 10.1 Follow the relevant policies, laws, regulations and rules to orderly carry out the work of the company to govern commercial bribery .
- 10.2 Exercise the duties of discipline inspection and supervision in accordance with the law, and organize special working groups to conduct audit investigations when necessary.
- 10.3 Organize to formulate, modify and improve the management methods or rules of the company's governance of commercial bribery.
- 10.4 From the perspective of the internal control system, review the management documents formulated and modified by various departments of the company, and make suggestions for modification and improvement.



- 10.5 To hold a quarterly meeting on commercial bribery and corruption management, and make timely prevention suggestions to the company.
- 10.6 To develop the company's annual anti-bribery and anti-corruption work study plan.
- 10.7 Review and listen to the company's major projects in economic activities (including bidding, bidding work) specific implementation plan, the project activities organization and implementation plan for risk assessment.
- 10.8 Strengthen the supervision and management of the integrity of personnel in important parts and important links.
- 10.9 Implementing the Anti-Commercial Bribery Commitment, keeping true records of the integrity of important parts and important links of personnel and establishing files.
- 10.10 Be responsible for the follow-up supervision and inspection of the company's implementation of these measures.

Article 11 Institutional Composition of the Office for Prevention and Control of Commercial Bribery.

The office of prevention and control of commercial bribery is located in the General Manager's Office, the director of the office shall be the General Manager, the team members shall be the chief financial officer, the assistant to the general manager and the managers of each department respectively, and an employee of the administration and HR department shall be specifically responsible for the daily work.

Article 12 In carrying out the work of combating commercial bribery, the Office of Prevention and Control of Commercial Bribery and all departments shall strengthen information communication and mutual cooperation, and submit reports directly to the General Manager's General Meeting and Shareholders' Meeting.

The Office of Prevention and Control of Commercial Bribery shall establish a report box for the prevention of commercial bribery, a report email address consistent with the office email address of its work constituents, and a report telephone number, in accordance with the contact information shown in the Company's Address Book List.

Chapter IV Control Responsibilities



- Article 13** The responsible person shall follow the following job responsibilities.
- 13.1 Strictly fulfill the contents promised in this undertaking.
 - 13.2 Prohibit any form of commercial bribery.
 - 13.3 Consciously accept the management of the supervisory department (management department) of commercial bribery prevention.
 - 13.4 If the commitment is violated, obey the supervision and management department to deal with it according to the relevant provisions.
- Article 14** Requirements for the signing of the Anti-Commercial Bribery Commitment.
- 14.1 Newly recruited employees shall be organized by the Administration and HR Department to sign the Anti-commercial Bribery Commitment at the same time when signing the labor agreement.
 - 14.2 In late March of each year, the Anti-commercial Bribery Commitment shall be signed once by the incumbent employees, led by the Prevention and Control of Commercial Bribery Office and organized by the Administration and HR Department.
 - 14.3 Customers, suppliers, service providers and contractors with whom the company has business dealings must also have clear content of integrity clauses in the business contracts signed with the company.
- Article 15** The establishment of anti-bribery and anti-corruption study and assessment system. At the beginning of each year, the Anti-Commercial Bribery and Anti-Corruption Office shall formulate an annual anti-bribery and anti-corruption learning plan, organize personnel to prepare learning materials, and organize staff learning in accordance with the learning plan, and incorporate it into the staff performance assessment work.
- Article 16** Strengthen anti-bribery education and evaluation, anti-bribery and anti-corruption work will be included in the regular meeting of the General Manager's Office evaluation.
- Article 17** The anti-bribery and anti-corruption activities shall be carried out as a part of the department's work summary and reported separately.
- Article 18** Senior management, department heads of the annual duty report, to report on the integrity of the situation listed separately, to report on their own and the department to carry out anti-bribery anti-corruption work.

Chapter V Supervision and Punishment

Article 19 Timely handling of the prevention of commercial bribery problems found in the word. For the found disciplinary violations, each department should promptly stop or deal with and inform the relevant departments of the situation, suspected of crime should be transferred to the judicial organs.

Article 20 The company's departments shall strengthen the management of personnel in important positions and take the implementation of the "Commitment" as an important part of the inspection and assessment and an important basis for appointment and removal.

Article 21 The administrative department of the company shall supervise and inspect the implementation of this method according to its responsibilities and authority, and deal with or make suggestions for dealing with the non-fulfillment of the "Letter of Commitment" of the personnel in important positions.

Article 22 The personnel of important positions of the Company who violate this procedure shall be given corresponding treatment in accordance with the relevant provisions according to the severity of the violation.

Article 23 The company whose personnel violates the anti-bribery and anti-corruption provisions shall be resolutely disqualified as suppliers and service providers, and those who constitute commercial bribery crimes shall be referred to the judicial organs for criminal responsibility.

Article 24 The company encourages employees and companies with business contacts to report and expose corruption. The acceptance of prosecution, investigation and other aspects must be strictly confidential. The disclosure of the name of the informant, department, company name and other information are strictly prohibited. During the investigation and verification of the situation, the original or copies of the prosecution materials shall not be presented. For the anonymous letters and materials of the prosecution, shall not identify the handwriting, the prosecution materials shall not be arbitrarily lent to the public.

Article 25 Penalty provisions for breach of compliance policy.

25.1 The amount of compensation for the company's sales reduction caused by breach of compliance policy will be 30 times of the profits obtained with the breach of compliance policy.

25.2 The company has the right to unilaterally terminate the employment contract, and does not pay any labor compensation in case of breach of the compliance policy.

Chapter V By-laws

Article 26 Any matters not covered by these policies shall be carried out in accordance with the relevant laws and regulations.