



ANTI-BRIBERY AND CORRUPTION POLICY

Medtecs International Corporation Limited (the “**Company**”, together with its subsidiaries collectively, the “**Group**”) is committed to conducting its business with integrity and in compliance with all applicable laws and regulations. As a listed company on the Singapore Stock Exchange, we are committed to maintaining the highest standards of ethical conduct and transparency in all of our business dealings.

As such, we have developed this Anti-Bribery and Corruption Policy (the “**Policy**”) to ensure that the Group’s directors, employees, agents, and representatives understand and abide by the legal and ethical standards that govern our business activities.

- 1 Policy Statement:** The Group prohibits bribery and corruption in any form, whether directly or indirectly, and the prohibition applies to all of its directors, employees, agents, and representatives. This Policy governs all business activities, whether conducted within or outside of Singapore, and applies to all interactions with government officials, customers, suppliers, partners, and other third parties. The Policy is intended to be read in conjunction with the Group’s [Code of Ethics and Professional Conduct](#), as well as all applicable laws and regulations, including but not limited to Singapore's Prevention of Corruption Act, United States’ Foreign Corrupt Practices Act, and the United Kingdom’s Bribery Act 2010.
- 2 Prohibited Conduct:** The Group prohibits any and all forms of bribery and corruption. Bribery is the offering, giving, soliciting or accepting something of value, whether in cash or in kind, directly or indirectly, to or from any person, whether public or private, in order to gain any commercial, contractual or regulatory advantage for the Company or for any third party. This includes, but is not limited to, gifts, favors, payments, commissions, or other benefits or financial advantages.
- 3 Due Diligence:** The Group shall conduct appropriate due diligence on its business partners, suppliers, customers and other third parties to ensure that they also have a commitment to anti-bribery and corruption. This includes, but is not limited to, reviewing their anti-bribery and corruption policies and procedures, assessing their reputation in the industry, and monitoring their compliance with applicable laws and regulations.

- 4 Gift Giving and Entertainment:** The Group recognizes that gift giving and entertainment can be a normal and acceptable part of business conduct. However, these activities can also be used as a means of bribery and corruption. When dealing with non-governmental employees, Group employees should limit offer or acceptance of gifts, including products, personal services, or favors, to those valued at less than USD 100 per person. All gift giving and entertainment over the value of USD 100 per person must be approved in advance by the local Legal Department or the General Counsel and recorded through the Company gifts and hospitality register system. Approval will be based on the appropriateness of the gift or entertainment, its value, and the Group's relationship with the intended recipient.
- 5 Facilitation Payments & Grease Money:** The Group prohibits the use of facilitation payments and grease money to influence the actions of government officials or other third parties. Facilitation payments are small payments made to government officials or other third parties to expedite or secure the performance of a routine or necessary action to which the payer is entitled by law. Grease money is any payment made to government officials or other third parties to influence their actions or decisions. These types of payments are illegal under applicable laws and regulations and will not be tolerated by the Company.
- 6 Reporting:** The [Group's Whistleblowing Policy](#) ensures that those who come forward with information about potential misconduct or violations of the Policy are protected from retaliation and discrimination. All directors, employees, agents, and representatives must report any suspected or actual violations of this Policy to their supervisor, the Group's General Counsel or any member of the management team. Reports can also be made via email: whistleblowing@medtecs.com. Any reported violations will be investigated promptly and appropriate action will be taken, for example, conducting an internal investigation, cooperating with any regulatory or legal investigations, and taking disciplinary action against any director, employee, agent, or representative who violates this policy.
- 7 Compliance:** All directors, employees, agents, and representatives of the Group are expected to comply with this Policy and to seek guidance from the management team or the Group General Counsel if they have any questions about its application. Non-compliance with this Policy may result in disciplinary action, up to and including termination of employment.

- 8 Training:** All Group directors, employees, agents, and representatives must understand and comply with the principles set forth in this Policy. The Group will ensure that all stakeholders will receive periodic training and communications on this Policy based on their specific roles and responsibilities to ensure that they are aware of the Group's commitment to integrity, and the possible consequences of violating the Policy.
- 9 Audit:** Periodic audits will be conducted on all local systems, processes, policies, and controls put in place to enforce this Policy, to assess and evaluate their effectiveness and currency. During these audits, it is expected that all directors, employees, agents, and representatives will be transparent and cooperative with Medtecs' internal and external auditors.
- 10 Review and Update:** The Group recognizes the importance of regularly reviewing and updating this Policy to ensure that it remains current and consistent with applicable laws, regulations, and industry standards. The Policy will be reviewed and updated as necessary to ensure that it continues to reflect the Group's commitment to conducting business in an honest and ethical manner. Additionally, the Company will keep on monitoring the compliance of the policy and will take appropriate action if any violation is found.