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1.0 Purpose

1.1 PC Group is committed to conducting its business with the highest standards of integrity, ethics, professionalism, and compliance with applicable laws and regulations. Third Parties (including vendors, suppliers, contractors, consultants, agents, distributors, representatives, and sub-contractors) engaging with the Company are expected to share and uphold these standards. This Code outlines minimum expectations for Third Parties in their business conduct while engaged with the Company.

2.0 Scope


- 2.1 This Code applicable to the following PC Group of Companies:
- i) CTI Resources Sdn. Bhd.
 - ii) Precision Control Sdn. Bhd.
 - iii) Pro Cahaya Industries Sdn. Bhd.
 - iv) Precision Control (Penang) Sdn. Bhd.
 - v) Sinar Tenaga M&E Sdn. Bhd. (previously known as PC Installation & Contracting Sdn. Bhd.).
 - vi) YNY Technology Sdn. Bhd.
- 2.2 This Code applies to all Third Parties providing goods or services to PC Group, whether directly, indirectly, or through intermediaries. Third Parties shall ensure that their employees, agents, subcontractors, and affiliates comply with the standards of this Code throughout their engagement. Compliance with this Code is a condition of doing business with PC Group.

3.0 Company Assets

3.1 Third Parties must protect PC Group’s physical, financial, intellectual property and information technology assets from loss, damage, theft, misuse, or inappropriate access. These assets are to be used solely for legitimate business purposes in accordance with contractual arrangements with PC Group.

4.0 Company Information

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4.1 Third Parties shall safeguard all information provided by PC Group, whether marked “Confidential” or not, and shall not disclose such information to any unauthorized persons or use it for any purpose other than fulfilling contractual obligations. Unauthorized disclosure of confidential information is prohibited unless required by law.

5.0 Dealing with Customers

5.1 Third Parties must engage with customers, end-users and stakeholders professionally, honestly, and fairly. Third Parties shall not make false or misleading representations about products or services and shall comply with applicable consumer protection laws and ethical sales practices.

6.0 Dealing with Media

6.1 Third Parties shall not speak on behalf of PC Group or make public statements regarding PC Group’s business, reputation, performance or strategy without prior written authorization from PC Groups designated spokesperson. Media inquiries should be referred to PC Group’s communications team.

7.0 Conflict of Interest

7.1 Third Parties must disclose any actual, potential or perceived conflicts of interest that may influence, or appear to influence, impartial decision-making. Conflicts include relationships with PC Group employees, affiliations with competitors or other business interests that compromise objective performance. Third Parties shall avoid actions that may give rise to actual or perceived conflicts of interest.


8.0 Anti-Money Laundering

8.1 Third Parties shall comply with all applicable anti-money laundering, counter-terrorism financing and financial reporting laws. Third Parties must not engage in, facilitate, or conceal activities involving proceeds from illegal or unethical activities, and shall implement internal controls to prevent money-laundering risks.

9.0 Child Labor

9.1 Third Parties must not employ children below the minimum legal working age in the jurisdictions in which they operate and must comply with applicable laws

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that govern youth labor and working conditions. Third Parties are expected to uphold human rights standards, ensuring that employment practices do not exploit children.

10.0 Health, Safety & Environment

10.1 Third Parties shall comply with all applicable health, safety and environmental laws and regulations. They must maintain safe working conditions, prevent workplace hazards and manage environmental impacts responsibly, including waste management, pollution prevention, and energy efficiency.

11.0 Anti-Bribery & Corruption

11.1 Third Parties must not engage in bribery, corruption, extortion, kickbacks, or any other improper means of obtaining or retaining business. The offering, giving, solicitation, or acceptance of any bribe, gratuity, facilitation payment, or improper advantage is strictly prohibited. Third Parties must comply with all anti-corruption laws, including the Malaysian Anti-Corruption Commission Act and relevant international statutes.

12.0 Gifts, Hospitality & Entertainment

12.1 Third Parties shall refrain from offering or providing gifts, hospitality or entertainment to PC Group employees or stakeholders if it could improperly influence, or be perceived to influence, business decisions. Modest gifts and hospitality for legitimate business purposes may occasionally be acceptable provided they are lawful, transparent, and appropriately documented.


13.0 Charitable Donations & Sponsorships

13.1 Third Parties shall not make charitable donations or sponsorships intended to secure a business advantage, improperly influence decisions, or create conflicts of interest. Any donation or sponsorship should be lawful, ethical, and free from any implication of undue influence.

14.0 Political Contributions

14.1 Third Parties shall refrain from making political contributions or expenditures on behalf of PC Group, or in PC Group’s name, to influence any election, public office holder, or public policy without explicit prior written authorization. All political engagement must comply with applicable laws.

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15.0 Facilitation Payments

15.1 Unofficial payments made to expedite routine government actions are prohibited. Third Parties must not make, directly or indirectly, facilitation payments on behalf of PC Group or in connection with PC Group business. Such requests must be reported immediately.

16.0 Fraud

16.1 Third Parties must not engage in fraudulent activities, including misrepresentation, false invoicing, falsifying records, or any act intended to deceive for financial or personal gain. All financial records and transactions must be accurate, complete, and transparent.

17.0 Whistleblowing

17.1 Third Parties must promptly report any known or suspected violations of this Code, applicable laws, unethical conduct or instances of misconduct. Reports should be made through PC Group’s designated whistleblowing channels. Retaliation against individuals who report in good faith is prohibited.

18.0 Non-Compliance with This Code

18.1 Failure to comply with this Code may result in corrective actions, including termination of contracts, suspension of business, financial penalties, legal actions and potential reporting to relevant authorities. PC Group reserves the right to audit or assess Third Parties for compliance and to enforce consequences for violations.

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