

## **BUSINESS ETHICS POLICY**

### **INTRODUCTION**

DTC strictly comply with applicable laws and regulations within the scope of business, abide by the highest standards of business ethics, comply with the principle of fair competition and transaction integrity in all business interaction, rejection of corruption and unfair competition, and respect for intellectual property rights to create harmonious business environment.

### **SCOPE**

This policy applies to all employees and stakeholders of the company (including but not limited to customers, suppliers etc.)

### **REQUIREMENTS**

#### **1. Corruption & Bribery**

The company takes a "Zero tolerance" attitude towards bribery and corruption and requires all new employees to sign below the Code of Business Conduct to show that they have fully understand and are willing to commit to the Code. DTC have so far stand firm and rather turn down business, than give in to the pressure of using bribery to get business.

#### **2. Fraud**

The company takes a firm stance against fraud, as outlined in the code of business conduct. Similarly, DTC's electronic communications such as instant messaging, voice mail, e-mail, website, computers, network and internet access systems, both internal and external, including third-party internet service providers, must not be used for fraudulent activities. Employees who have spotted fraudulent behaviour must promptly report the incident via the whistleblowing channels.

#### **3. Free & Fair Competition**

Free & fair competition is the best social outcome for consumers, society and our business. We fully support competition and will not engage in anti-competition activities like price fixing, colluding with competitors or any other actions that distort the spirit of free market.

#### **4. Privacy & Data Protection**

Information considered sensitive and confidential should never be disclosed or revealed to others outside the organization without permission. Employees are briefed and also informed in the employee handbook of the seriousness of this, and this clause has been included into the employment contracts.

#### **5. Management of Supply Chain Anti-Corruption**

Managing supply chain corruption is essentially the core to our business. If we allow this to happen, it will diminish the company competitiveness and is bad for the society. DTC strives to reduce the exposure by mapping out our High-Risk and Medium-Risk suppliers which DTC use and assess and communicate to all these High-Risk and Medium-Risk suppliers that this is not acceptable.

**6. Intellectual Property**

DTC respects intellectual property rights of inventors and will advise our customer if what they want to produce is infringing the inventors' patent. DTC had recently also registered a trade mark for a product new launch, as we fully understand the importance of having intellectual property protection.

**7. Conflict of Interest**

At DTC, we are committed to upholding the highest standards of ethics, integrity, and transparency. We ensure that all employees, contractors, and stakeholders act in the best interests of the company and its stakeholders, free from any conflicts or potential conflicts that may compromise our objectives or erode trust. We expect all individuals associated with DTC to promptly disclose any conflicts of interest, and we will take appropriate measures to manage and mitigate these conflicts. By adhering to this policy, we reinforce our commitment to maintaining a fair and ethical work environment, promoting the long-term success of our organization, and safeguarding the trust placed in us by our clients, partners, and the wider community.

**WHISTLEBLOWING**

Report if you see irregularities such as -

- Forgery
- Misappropriation of funds and classified documents
- Failure to comply with laws and regulations
- Corruption and bribery
- Anti-competitiveness Practices
- Money Laundering
- Disclosing of Confidential Information

Informants can report cases through the below whistleblowing channels:

Receiving Officer: General Manager

Hotline : [+65 97299116](tel:+6597299116)

Email : [whistleblowing@dtcworld.com](mailto:whistleblowing@dtcworld.com)

Wechat : yeechin77

Feedback Box: at the entrance near to DTC office

Head Office Address: 7 Gambas Crescent, #05-24 ARK @ Gambas, Singapore 757087

**POLICY BREACH**

As part of this commitment, all forms of bribery and corruption practices shall be regarded as unacceptable and will not be tolerated. Failure to comply with this policy, whether or not is intentional, may lead to disciplinary action (Up to and including dismissal) and criminal liability for the individual involved (up to and including imprisonment).

Employees will be required to confirm that they have read and understood to the policy and that they comply with its terms as part of their ongoing employment assessment processes. All relevant employees will be required to attend training to support the guidance in this policy.

**ROLES AND RESPONSIBILITIES**

<b>Person in Charge</b>	<b>Roles &amp; Responsibilities</b>
CEO	Responsible for policy approval
Managing Director	Owns, endorses and ensure the implementation of the policy.
General Manager	Responsible for ensuring that this policy and related standards are implemented and adhered to, and that all relevant employees are made aware of the policy and its requirements. Ensure local compliance with the policy including adequate control measures to eliminate or reduce risks to express behaviours in breach with the policy.
HR Executive	Drives the implementation of the policy, provides specific advice on business ethics labour and human rights issues and dilemmas, and ensures that business ethics issues are identified and addressed. Audits, reviews, measures and reports on business ethics performance.
Management, employees and contract	Comply with the letter and spirit of the policy. Engage and take responsibility for ensuring that all initiatives are developed in line with the policy.

**DEVIATIONS**

No exemptions from this policy can be granted unless there are exceptional circumstances or the policy is obviously not applicable. All requests for exemptions must be made in writing to the policy owner. The policy owner must assess and decide on each request individually. Exemptions must be duly logged and documented

**POLICY REVISION**

This policy must be regularly reviewed in order to ensure its continued adequacy and relevance. It can be amended with the approval of CEO.