

CODE OF CONDUCT

ANTI-MONEY LAUNDERING

“Money laundering,” is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate.

We will to the best of our ability and knowledge conducting business with reputable customers with legitimate funds, for legitimate business purposes.

INSIDER TRADING

Insider trading is defined broadly to cover situations where Employees buy or sell securities (quoted shares) while they are in possession of confidential information which is not generally available to the public and affects or may affect the value to be placed on these securities. The Employees may have such information by virtue of their position in the Company or because someone in such position may have provided them, directly or indirectly, with the information.

Definition

Insider trading includes trading in the following categories:

- i. Employees' own company.
- ii. Principal, subsidiary and associated companies.
- iii. Customer or supplier companies.
- iv. Companies in which the above categories are connected e.g. companies for which an offer or takeover is contemplated.

Insider

An insider includes:

- i. All directors, whether executive or non-executive.
- ii. All Employees.
- iii. Family of directors and Employees.
- iv. Beneficial trusts of all the above mentioned.
- v. Other persons acting on behalf of or in conjunction with the abovementioned.

Dealings

No insider shall buy, sell or otherwise deal, directly or indirectly, in the shares of any company within the Company in the following periods:

- i. During the period commencing from the time information is obtained up to one (1) full trading day after the announcement of a matter that involves unpublished price-sensitive material information in relation to the securities of the Group or, where relevant, any other listed public company.
- ii. During the period from the commencement of negotiation for a corporate proposal involving a transaction having a value exceeding 25% of the net assets of the listed public company up to one (1) full trading day after the announcement or one (1) day after the abortment of negotiation, as the case may be.
- iii. During the period commencing from the expiry of the financial year, half year or quarter, as the case may be, up to one (1) full trading day after the announcement of the Company's results for the financial year, half-year or quarter, as the case may be, and/or of any dividends and distributions to be paid or passed.

In the event that there is a compelling reason to dispose of the shares which an insider wishes to sell within the periods defined above, prior written approval must be obtained from the Managing Director. This applies similarly to the shares of all other companies as listed in the definition above.

Price-Sensitive Information

- i. Employees shall accept and understand that price-sensitive information is strictly confidential to the Employees concerned alone and should not be discussed or divulged to another person except in an official capacity and on 'need to know' basis.
- ii. Employees shall not deal in the listed securities of their own listed issuer or of other listed issuers as long as they are in the possession of price sensitive information relating to such listed securities.
- iii. In this context, any information is classified price-sensitive which, if known to an outsider, is likely to have an effect on the price of a Company's securities. This includes but not limited to, information on profitability, new issues, dividends, cash flow, mergers, acquisitions, major capital outlay etc.