

	<b>Standard Operating Procedures</b>  <b>GHCD</b>	DOC NO: 4.11.4	ISSUE: 2
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<b>1.0</b>	<b>Code of Conduct</b> <p>1.1 This Code provides ethical guidance to all staff in the conduct of their business.</p> <p>1.2 This Code provides a common behavioural framework for all staff, irrespective of their specific jobs or locations. However, it is not intended to be all-encompassing and there are areas in which Company has developed or will develop specific policies. This Code is to be read and applied in conjunction with such policies.</p> <p>1.3 This Code does not describe all of the laws to which we are subject, nor does it cover every ethical issue. Other laws and Company policies and practices, as well as common sense, apply.</p>
<b>2.0</b>	<b>Applicability of Conduct</b> <p>2.1 This Code applies to all staff. Staff shall mean all individuals on full-time or part-time employment with the Company, with permanent, probationary, trainee, temporary or contractual appointment.</p> <p>2.2 The standards set out in this Code extend beyond normal working hours, and apply to staff fulfilling their roles while on the business of the Company, including after hours' functions and social activities.</p> <p>2.3 It is a condition of employment with company that all staff comply with this Code and all applicable laws, regulations and other policies of the Company and failure to comply may result in the commencement of disciplinary proceedings that may lead to termination of employment.</p>
<b>3.0</b>	<b>Compliance with Laws</b> <p>3.1 Company operates in a highly regulated business environment and its activities are subject to numerous laws, regulations and licensing conditions. Staff must ensure that they familiarise themselves with the laws, regulations and licence conditions applicable to their activities. If in doubt, staff are to seek advice.</p> <p>3.2 Staff activities and the business activities must be conducted in absolute compliance with applicable laws and regulations.</p> <p>2.3 Company aims to provide a safe working environment for its staff. Staff must work safely and adhere to appropriate industry practices and laws to protect their health, safety and wellbeing.</p>

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<b>4.0</b>	<p><b>Professionalism</b></p> <p>4.1 The personal and professional behavior of staff shall conform to the standards expected of persons in their positions, which includes:</p> <ul style="list-style-type: none"> <li>• A commitment to and adherence to professional standards in their work and in their interactions with other staff;</li> <li>• A commitment to maintain the highest standards of integrity and honesty in their work;</li> <li>• An adherence to ethical and legal standards to be maintained in business;</li> <li>• A responsibility to support company in its efforts to create an open and mutually supportive environment;</li> <li>• A responsibility to share information and give willing assistance in furthering the goals and objectives of the Company; and</li> <li>• A responsibility to ensure that there is no misrepresentation of facts. Wherever a misunderstanding is thought to have taken place through unclear communications, this should be corrected promptly.</li> <li>• The use of inappropriate or offensive language is not permitted. Inappropriate or offensive language includes, but is not limited to, any language or content that is sexually oriented or abusive, harassing, defamatory, vulgar, obscene, profane, hateful, or that contains racially, ethnically or otherwise objectionable material of any kind.</li> </ul>
<b>5.0</b>	<p><b>Fair Dealing</b></p> <p>5.1 The aim of the Company is that it provides an environment in which all staff are treated fairly and equitably irrespective of amongst others, sex, race, age, disability and religion or ethnic origin. Staff are to conduct themselves and the business activities to facilitate these aims being achieved.</p> <p>5.2 Corrupt practices, whether directly or through intermediaries, are unacceptable. No bribes or improper payments or inducements will be made to, or accepted from, any party, irrespective of local business custom and practices.</p>
<b>6.0</b>	<p><b>Confidentiality &amp; Protection of Company's Assets</b></p> <p>6.1 Staff must ensure confidentiality of all information, including but not limited to terms and conditions of contracts entered into by the Company, transactions, statistics, plans, reports, drawings, performance, financial details and policies and procedures of the Company.</p> <p>6.2 Assets and confidential information should be fully protected and must not be used by staff for personal gain or for any other reason that is not in the best interests of company.</p>

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	<p>6.3 Staff must take all reasonable steps to ensure the company's assets are protected from theft, destruction, or other loss.</p> <p>6.4 Theft or misappropriation of property owned by company will not be tolerated and should be immediately reported and properly investigated.</p>
<b>7.0</b>	<p><b>Employment</b></p> <p>7.1 Company considers itself to be the primary employer of its staff. All staff shall devote their time and their best efforts to promote company's business and may not without the prior written consent of the Company (and subject to any terms and conditions as may be imposed by the Company) engage or be interested in (whether directly or indirectly) in any other business, employment or vocation for pecuniary gain.</p> <p>7.2 All staff are expected to be available to perform their assigned duties, during normal working hours and otherwise, as necessary. Staff engaged in or contemplating outside employment or representation should carefully consider the impact, if any, on their ability to fulfill their responsibilities to company. This includes potential conflicts of interest, availability for work, and any other factor that may prejudice the interests of company.</p> <p>7.3 The use of company resources, i.e., equipment, manpower, supplies, facilities, etc., by the staff for another organization, whether that staff receives compensation from that organization or not, is prohibited unless expressly authorized by the management and/or the Board of Directors.</p>
<b>8.0</b>	<p><b>Conflict of Interest</b></p> <p>8.1 Staff are to act in the best interests of the Company.</p> <p>8.2 Staff must not engage in activities that directly or indirectly involve, or could appear to involve, a conflict between their personal interests and the interests of company.</p> <p>8.3 Staff are also advised not to engage in any other business or commercial activity that may conflict with their ability to perform their duties and/or interfere with the performance of their duties to company.</p> <p>8.4 Areas where conflicts might arise include: substantial share ownership in competing organizations, direct or indirect personal interest in contracts with any third party or dual employment with outside organizations or representing other companies in business transaction.</p> <p>8.5 Any actual or potential conflicts of interest are to be fully disclosed to management and/or Board of Directors and where such circumstances are permitted by management and/or the Board of Directors to continue, shall not be deemed a breach of this Code.</p>

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<b>9.0</b>	<b>Fraud</b>  9.1 The act or intent to cheat, trick, steal, deceive, or lie are subject to strict disciplinary action, including dismissal and possible civil and/or criminal action against the concerned staff.
<b>10.0</b>	<b>Reporting Non-Compliance</b>  10.1 Staff are to report genuine suspicions of non-compliance with this Code through appropriate channel.  10.2 The reporting of non-compliances with this Code may either be made to the supervisor, manager and/or Board of Directors or may be done in accordance with the Whistleblowing Policy which shall be a safe environment in which to speak up without fear, reprisal or victimization.
<b>11.0</b>	<b>Specific Principles</b>  11.1 The Company envisages itself as an equal opportunity employer and aims to: <ul style="list-style-type: none"> <li>• Make Group Human Capital Division decisions on the basis of merit with the information available to it, including the possession of skills, experience, qualifications and characteristics relevant to the performance of work;</li> <li>• Ensure unlawful discrimination does not occur in the workplace or in circumstances arising out of the employment relationship;</li> <li>• Maintain a workplace free from sexual harassment, unfair discrimination or other offensive conduct; and</li> <li>• Promote a work environment in which individuals have the opportunity to develop and realize their full potential.</li> </ul> 11.2 A staff who is found to be in breach of this Code, other company policies or applicable laws will be subject to disciplinary action. Inappropriate conduct or non-compliance issues will be brought to the attention of the staff who will be allowed to respond to any allegations.  11.3 Any grievances with respect to a staff's employment, treatment, action of other staff or compliance with this Code or other policies should be raised.
<b>12.0</b>	<b>Sexual Harassment</b>  12.1 Sexual harassment may include unwelcome physical, verbal or non-verbal conduct, but is not limited to the examples listed as follows:

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- Physical conduct of a sexual nature includes all unwanted physical contact, ranging from touching to sexual assault and rape, and includes a strip search by or in the presence of the opposite sex.
- Verbal forms of sexual harassment include unwelcome innuendoes, suggestions and hints, sexual advances, comments with sexual overtones, sex-related jokes or insults or unwelcome graphic comments about a person's body made in their presence or directed toward them, unwelcome and inappropriate enquiries about a person's sex life, and unwelcome whistling directed at a person or group of persons.
- Non-verbal forms of sexual harassment include unwelcome gestures, indecent exposure, and the unwelcome display of sexually explicit pictures and objects.
- Quid pro quo harassment occurs where an owner, employer, supervisor, member of management or co-staff, undertakes or attempts to influence the process of employment, promotion, training, discipline, dismissal, salary increment or other benefit of the staff or job applicant, in exchange for sexual favors.
- Sexual favoritism exists where a person who is in a position of authority rewards only those who respond to his sexual advances, whilst other deserving staff who do not submit themselves to any sexual advances are denied promotions, merit rating or salary increases.
- As a guiding principle, company shall create and maintain a working environment in which the dignity of staff is respected. A climate in the workplace should also be created and maintained in which victims of sexual harassment will not feel that their grievances are ignored or trivialized, or fear reprisals. Implementing the following guidelines can assist in achieving these ends:
- Management and staff are required to refrain from committing acts of sexual harassment.
- Management and staff have a role to play in contributing towards creating and maintaining a working environment in which sexual harassment is unacceptable. They should ensure that their standards of conduct do not cause offence and they should discourage unacceptable behavior on the part of others.
- Management should attempt to ensure that persons such as customers, suppliers, job applicants and others, who have dealings with the business, are not subjected to sexual harassment by its staff.
- Management is required to take appropriate action in accordance with this code, when instances of sexual harassment which occur within the workplace are brought to their attention.

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<b>13.0</b>	<b>Occupational, Health, Safety &amp; Environment</b>  13.1 It is envisaged that company will conduct its business activities and operations in a safe manner and in an environment that prevents, to the extent possible, injury to its staff.  13.2 Company endeavours to ensure that it will reduce the environmental impacts of its business activities and will seek to do this through continual improvement of environmental performance, protection and safety.  13.3 Company is committed to provide effective support and training for the staff to assist them in their responsibilities of ensuring a safe workplace and reducing the environmental impacts of their activities.  13.4 Staff shall maintain a work environment that is safe and free from all types of discrimination or harassment. This is done by encouraging each individual to respect the fundamental rights of every person in the Company.
<b>14.0</b>	<b>Political Activities</b>  14.1 Staff must be careful to uphold company's reputation by only participating in political activities on their own time and at their own expense. Usages of Company funds or assets, including facilities, equipment or trademarks are not allowed in such activities. In addition, staff should never use company's name while taking part in these activities.
<b>15.0</b>	<b>Continual Improvement</b>  15.1 The appropriateness and effectiveness of this Code will be continuously monitored and appropriate improvements and reporting procedures will be adopted where necessary.
<b>16.0</b>	<b>Amendments &amp; Updates</b>  16.1 This Code may be updated from time to time. Staff are required to comply with the Code as updated.  16.2 Amendments to this Code must be approved by the Top Management.  16.3 All updates and amendments are to be communicated to staff.