

"Code of Professional Conduct"

The Company's binding Code of Conduct

1. BOD and Executive Management shall comply with the principle of commitment by Board Members and Executives for upholding the interest of the Company, its shareholders, and other stakeholders and not just the interest of a specific group. This shall be within the framework of applicable laws and instructions.
2. The Board Members and the Executive Management shall not use the authority given to them for furtherance of their specific interest or any other personal interests for themselves or for others.
3. The Company expects each Director and Senior Executive to use all reasonable endeavors to protect Company's assets and to ensure their efficient use for legitimate business purposes as approved by the Board. Any suspected fraud or theft of a Company asset shall be reported for investigation.
4. Any information acquired by a Director, independent or otherwise, or Senior Executive while performing their duties which are confidential in nature, must not be used for their personal interest, except if such disclosure is:
 - Authorized by the Board of Directors, or
 - Required by law or a regulatory body.
5. The existence and details of any Board and management information, discussions and decisions that are not publicly known and have not been approved by the Board for public release are confidential information of the Company. Each Director's and Senior Executive's obligations of confidentiality continue, even after he or she leaves the Company.
6. The Board has established policies and procedures in place for transacting a business with related parties. There shall be clear separation of interest of the Company's interest and of the Board Members, through establishing techniques for putting the company's interest over members' interest.
7. Each Director and Senior Executive must not exploit for their own personal gain the opportunities that are discovered through the use of corporate property, information or position unless the opportunity is disclosed fully in writing to the Company.

8. The Board members are prohibited from participating in discussions or providing opinion or voting on any subject represented to the Board in which they have a direct or indirect interest.
9. The Board shall encourage employees to express their doubts about any wrong practice or suspicion in the financial reports or the internal control systems or any other matter. The proper arrangements shall be made for conducting independent and fair investigation into these matters, with privacy guarantee to the informant that protects him from any negative reactions or harm that may happen as a result for conveying information about those practices.

Additional requirements

1. **Corporate Opportunities-** All staff, including Executive Management and Directors shall not use corporate property, information, or position for personal gain, and may not compete with the Company directly or indirectly.
2. **Competition and Fair Dealing-** Each Director and Executive Manager shall endeavour to respect the rights of and deal fairly with the Company's suppliers, competitors and employees. No Director or senior manager shall take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other illegal trade practice.
3. **Discrimination and Harassment-** Each Director and Executive Manager is committed for providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment based on race, colour, religion, sex, national origin or any other protected class.
4. **Health and Safety-** Each Director and Executive Manager has responsibility for maintaining a safe and healthy workplace for all employees and officers by following environmental, safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions. Violence and threatening behaviour are not permitted.
5. **Record Keeping, Financial Controls and Disclosures-** All of the Company's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the Company's transactions, must be promptly disclosed in accordance with any applicable laws or regulations and must conform both to applicable legal requirements and to the Company's system of internal controls.



6. **Waiver of the Code of Business Conduct-** Any waiver of these Codes towards executives or directors may only be permitted by the Chairman in writing and subsequently approved by the Board of Directors. It must also be promptly and legally disclosed in accordance to the law or regulations.
7. **Improper Influence on Conduct of Auditors-** The Company prohibits its officers and employees from directly or indirectly taking any action to coerce, manipulate, mislead or fraudulently influence the Company's independent auditors for the purpose of materially misleading financial statements.
8. **Financial Reporting-** The Company's policy is to provide full, fair, accurate and timely disclosure of required information in reports and documents that are filed with or submitted to any outside agency and in its other public communications. The Company expects Directors and senior management to take financial reporting responsibility very seriously and provide prompt and accurate answers to inquiries related to the Company's public disclosure requirements. A Board of Director or Senior Executive must ensure that Company's disclosure controls and procedures, and internal controls for financial reporting are properly complied with.