



# Code of Ethical Conduct

## **1 Purpose**

The Code of Ethical Conduct provides guidance to all our employees about the company's commitment to its employees, customers, shareholders, suppliers, and regulators. These commitments should be reflected in the daily decisions making regardless of the location and level of the organization. Along with the other company policies, it stipulates what is expected of each of us, so we can consistently do the right thing when representing the Group.

## **2 Scope**

The Code of Ethical Conduct applies to all employees of Best World Group.

## **3 Policy**

### **3.1 Our Commitment to Employees**

We respect the dignity of every individual. We are committed to creating a working environment where there is mutual trust, integrity and respect, where everyone is both personally accountable for their actions and responsible for our business performance and reputation.

#### **a. Health & Safety**

We provide our colleagues with safe and healthy working conditions and practices which are in line with the industry practice and respective country's regulation.

#### **b. Equal Opportunities**

We are committed to providing equal opportunities and will not tolerate discrimination of any kind. We recruit, retain and develop colleagues based on suitability of their role and the opportunity for personal and professional growth.

#### **c. Complaints of Harassment or Bullying**

We do not tolerate harassment and bullying in the organization. Any unwelcomed conduct, whether physical, verbal or visual in nature, which intimidates or offends another employee are considered an extremely serious matter. Any colleague who is found to have carried out such act will be subjected to disciplinary action.

#### **d. Use of Company Assets**

We own and has entrusted all our assets including physical property, records and data, intangible and intellectual property to our employees. All employees are expected to use the company assets with care. Theft or misappropriation of the company's assets or the property of others will not be tolerated.

e. Use of Social Media, messaging apps and any other digital channels/platforms

All employees of the Group are advised to use social media, messaging apps and any other digital channels/platforms responsibly, whether for business or in a personal capacity.

Employees should not:

- post comments about the company, management, colleagues, customers, vendors, or any other parties that could be perceived as harassment, defamatory, threatening, or discriminatory.
- post, upload or share any information which may result in breach of intellectual property rights.
- criticize on any sensitive topics which may include, but is not limited to, religion, race, and politics.
- disclose sensitive, private, or confidential company information (e.g. unannounced product launches or promotions, unannounced financial results, or customers information and more), to the public through any digital channels unless you are specifically authorised to do so.
- disclose stakeholders' or colleagues' personal information (e.g. personal addresses or phone numbers) without their prior consent.
- transfer files via messaging apps without being mindful that these files can "become viral" quickly. Official company information should be disseminated via company email (a legitimate and authenticated source), also for the purposes of archiving and audit.

*Reference: Conflict of Interest Policy BWI-COI-001  
Whistle Blowing Policy BWI-WB-001*

### 3.2 Our Commitment to Customers

Our customers are at the heart of everything we do, and we are determined to develop mutually beneficial relationships based on trust and respect.

a. Business Integrity

We do not give or receive, directly or indirectly for business or financial gain, any financial inducement or improper advantage, or engage in any form of corruption, or exercise undue influence over any other colleague or third party.

b. Protection of Information

We value the trust our customer place in us and will safeguard the information provided to us to the same high standard as we do our own.

c. Gifts and Entertainment

No employee may offer, give, or receive any gifts, entertainment without complying with the Group's Gifts and Entertainment Policy.

### 3.3 Our Commitment to Shareholders

We commit to creating sustainable, long term value for our shareholders. We communicate with all shareholders openly and transparently within the bounds of commercial confidentiality and regulatory limits.

#### a. Business Conduct

We recognize the growing interest in the way we conduct our business. Our shareholders and other stakeholders are entitled to know our values and standards and can expect us to live up to them.

#### b. Compliance

We comply with the laws and regulations of the countries in which we operate, including the listing obligations and governance codes of the Singapore Exchange Limited.

#### c. Communications

We ensure that all public announcements are accurate, complete, fair, timely, understandable and comply with all applicable laws and regulations.

#### d. Insider Trading

Buying and selling shares based on internal information not publicly disclosed is unethical and prohibited and may amount to the criminal offence of insider dealing.

*Reference: Interested Person Transaction Policy BWI-IPT-001  
Securities Dealing Policy BWI-SD-001  
Whistle Blowing Policy BWI-WB-001*

### 3.4 Our Commitment to Suppliers and Business Partners

We commit to ensure all suppliers and business partners are treated fairly and have equal opportunity to develop into a business relationship.

#### a. Contractual Obligations

We take our contractual obligations seriously.

#### b. Protection of Property

We commit to protect our property (including intellectual property) and respect the property of others with whom we do business.

#### c. Gifts and Entertainment

We do not accept gifts and entertainment from suppliers or business partners which might be seen to be putting us under an obligation when making business decisions. Reasonable tokens and hospitality may be accepted with reference to the Group's Gift and Entertainment Policy.

*Reference: Non-trade Procurement Policy BWI-NTP-001  
Interested Person Transaction BWI-IPT-001  
Gift & Entertainment Policy BWI-GE-001  
Whistle Blowing Policy BWI-WB-001*

### **3.5 Our relationships with Governments, Regulators, Communities, and Society**

It is extremely important for us to maintain honest, transparent and ethical relationships with government, their agencies and officials.

#### **a. Protection of Our Interest**

We promote and defend our business interests through co-operation with governments and other organization, both directly and indirectly through trade associations or its equivalent, for the development of proposed legislation and regulations that may affect our interests.

#### **b. Political Donations**

No gifts or donation will be made directly or indirectly to any political parties.

#### **c. Environment**

As part of our goal to develop a sustainable business, we aspire to make continuous improvements in the management of our environmental impact with emphasis on the need to reduce energy consumption and to manage waste by reducing, reusing, and recycling.