

**HARPS GLOBAL PTE. LTD.**

**CODE OF CONDUCT**



**HARPS GLOBAL PTE. LTD.**

**ORIGINATION**

<b>Internal Review Date</b>	<b>Name</b>	<b>Designation</b>	<b>Signature</b>	<b>Date</b>
28 Oct 2021	Lim Ka-Tsung Joachim	Head of Legal & Compliance		28 Oct 2021
30 Aug 2023	Lee Pei Pei	Group Chief Business Officer		30 Aug 2023

**REVISION HISTORY**

<b>Revision Code</b>	<b>Revision Description</b>	<b>Person in Charge</b>	<b>Effective Date</b>
COC-00	Reviewed and approved by Board	NTH	14 Jan 2021
COC-01	Reviewed by Legal & Compliance, together with Human Resource and Risk Management	NTH, JL	01 Nov 2021
COC-02	Revision to reflect the company name change from HARPS Holdings Berhad to HARPS Global Pte. Ltd. Reviewed and approved by Board.	LPP	01 Sep 2023

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# HARPS GLOBAL PTE. LTD.

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### 1. Introduction

HARPS GLOBAL PTE. LTD. (“**HARPS**” or the “**Company**”) has adopted the following Code of Conduct (the “**Code**”) which is applicable to everyone at every level including Directors, Management and Employees of the Company and its subsidiaries (the “**Group**”). This Code is established to promote the corporate culture which engenders ethical conduct that permeates throughout the Company. All Directors, Management and Employees of the Group shall be collectively referred to as “**Staff**” hereon.

We do expect our third-party business partners, including suppliers, customers, consultants, agents, contractors and others, to uphold the same high standards of business conduct similar to HARPS.

As we operate globally, due to some limited circumstances where local law or legal requirements may differ from our Code, we shall comply with the applicable local laws and our Code.

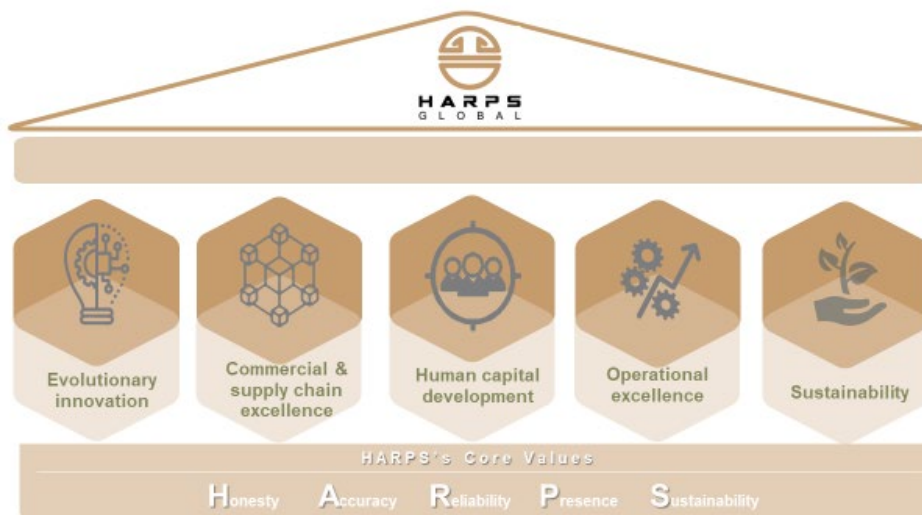
### 2. Our Corporate Philosophy

We are what we believe in; guided by our Values rooted in integrity, we want to be part of a better world. Our Corporate Philosophy entails:

#### Vision

People working together to protect people.

#### Corporate Strategy Pillars



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### Values

Honesty.	We act with integrity, fairness and sincerity.
Accuracy.	We focus on doing things the right way, with no shortcuts.
Reliability.	We never compromise on short term results, but rather invest in lasting trust.
Presence.	We are committed to upholding to the highest standards to be an inspiring presence in the work.
Sustainability.	We integrate the element of sustainability and social compliance into our business practice.

### 3. General Principles

The principle of this Code is based on principles in relation to trust, integrity, responsibility, excellence, loyalty, commitment, dedication, discipline, diligence and professionalism.

### 4. Purpose

This Code is formulated with the intention of achieving the following aims:

- To emphasise the Group's commitment to ethics and compliance with the applicable laws and regulations;
- To set forth basic standards of ethical and legal behaviour within the Group;
- To include noble characteristics in performing duties so as to improve work quality and productivity;
- To improve self-discipline in order to provide the Group with good and quality service; and
- To enhance skills in the implementation of duties and to be able to adapt to the work environment.

### 5. Communication and Compliance

The Group should ensure this Code is being communicated to all levels of Staff, including third-party business partners (suppliers, customers, consultants, agents, contractors and others), through staff handbook, notice board, intranet, or corporate website. The Group should include the briefing of this Code to new Staff in the induction program.

The Board should ensure this Code permeates throughout the Group and is complied by all levels of Staff within the Group including third-party business partners.

This Code may be supplemented by internal regulations and must correlate with the Code and disseminated within the Group. This Code sets the minimum standards and takes precedence over less stringent local or national laws and should there is any conflict, mandatory local or national law shall prevail.

For any doubts on compliance related matters, kindly email to [compliance@harpsglobal.com](mailto:compliance@harpsglobal.com).

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### **6. Staff's Responsibilities**

Every Staff is responsible to ensure compliance with the Code:

- Embrace our corporate philosophy in our daily work.
- Know and comply with the Code and the Group Policies and Procedures and all applicable legal requirements.
- Seek guidance when in doubt.
- Avoid illegal, unethical or otherwise improper acts.
- Use good judgment and take responsibility and accountability for own actions.
- Keep yourself updated to the changes of laws and regulations that apply to your work and seek assistance as necessary.
- Notify your department head (“**HOD**”) or the Board immediately if you suspect any irregularities.
- Report any suspected violation of policies, laws and regulations.
- Cooperate fully during any investigation by furnishing complete and accurate information.

Immediate superior or HOD must act as role models and have special responsibility to ensure that Staff under their supervision observe the Code.

The Group will take disciplinary action against any personnel who fails to act in accordance with applicable statutory laws, Group Policies and Procedures and this Code.

In the performance of his or her duties, each Staff must comply with the letter and spirit of the codes outlined herein.

### **7. Business Compliance Obligations**

The Group will comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions which the Group operates and we will conduct our business activities in an honest, ethical and responsible manner. Staff are expected to understand and comply with the laws, rules and regulations that are applicable to their positions and/or work activities. The Group reserves the right to report any actions or activities suspected of being criminal in nature to the relevant authorities or agencies.

### **8. Human Rights, Labour and Social Standards**

The Group supports and respects human rights and comply with the labour and social standards of the International Labour Organization (ILO). The following are the important principles to the Group:

- Equal opportunity and freedom from discrimination
- Prohibited all forms of child labour and forced labour
- Right to freedom of association and collective bargaining
- Fair remuneration and benefits based on local market conditions
- Observance of all applicable rules on working hours

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### **(a) Human Rights**

The Group treats Staff with dignity and respect in the workplace, provides equal employment opportunities, creates a safe and harmonious work environment, and will not engage in any form of discrimination. Staff should respect the personal dignity, privacy and rights of each individual they interact with during the course of work and shall not in any way cause or contribute to the violation or circumvention of human rights.

### **(b) Child Labour and Young Workers**

The Group will not use any form of child labour or young workers. The minimum age for employees shall comply with the national minimum age of employment, or the age of completion of compulsory education, whichever is higher (UN Convention on the Rights of the Child, ILO Conventions Nos. 138, 182 & 79, ILO recommendation No.146).

### **(c) Forced Labour and Human Trafficking**

The Group prohibits the use of any forced labour, bonded labour, prison labour or any kind of trafficking of human beings. We are committed to continual improvement in eradicating forced labor and human trafficking in its operations and in its supply chain.

### **(d) Equal Opportunity**

The Group strives to embrace equal opportunities at the workplace. We base our employment decisions (recruitment, promotion, salary, training, etc.) on the individual's qualifications and abilities and not on the age, race, gender, religion, disability, sexual orientation, or skin colour. We believe that every staff should be treated with respect and dignity regardless of their background.

## **9. Workplace Behaviour**

### **(a) Non-Discrimination and Harassment**

We are committed to provide and maintaining a positive, safe and secure work environment that is free from discrimination, harassment, intimidation, threats and violence. Each Staff is treated with respect and dignity and able to do their jobs without fear of discrimination or harassment. We will not tolerate any kind of harassment (verbal, visual or physical) including sexual harassment, bullying or other behaviors that will create a hostile work environment. We will comply with the applicable local laws that prohibit discrimination or harassment.

### **(b) Diversity and Inclusion**

We are committed to a workplace environment that promotes diversity and inclusion and creates an open and inclusive culture where everyone feels valued. All Staff bring their own background, work style, capabilities, experience and characteristics to their work. We recognize that our talented and diverse workforce reflects the diversity of our customers

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and markets and we want to utilize the widest range of skills, knowledge and experience in our business while complying with legislation.

### **(c) Drugs and Alcohol**

We believe that the use of intoxicating beverages or controlled substances/illegal drugs contribute to an unsafe work environment. Reporting to work under the influence of alcohol, illegal drugs or any controlled substance, which impairs any Staff's mental or physical capacity, will not be tolerated. Any use of illegal drugs or controlled substance during company events or while conducting business is strictly prohibited. The unauthorized use, sale, purchase or possession of alcohol or controlled substances/drugs at the Group's premises or in any company vehicles will be subject to disciplinary action including dismissal. Where there exist reasonable grounds to believe that the employee is under the influence of alcohol, illegal drugs/substance abuse, the Group may direct the employee to submit to a drug screening or blood test. Reasonable grounds would include a combination of various factors such as slurred speech, red eyes, dilated pupils, incoherence, unsteadiness on feet, smelling of alcohol or marijuana emanating from the employee's body, inability to carry on a rational conversation and increasing carelessness. Any Staff tested positive for any illegal drug or alcohol abuse is subject to immediate termination.

## **10. Protecting HARPS**

### **(a) Company Assets**

The Group's properties and assets should be managed and safeguarded in a manner which protects their values. Staff are accountable both for safeguarding all assets entrusted to them, including information resources, records, materials, facilities and equipment under their care or control, from loss, theft, waste, misappropriation or infringement and for using the assets to advance the interests of the Group. All Staff have an affirmative duty to immediately report the theft, loss or misappropriation of any company assets, including financial assets, physical assets, information assets and electronic assets to the management as stipulated under Violations of Code of Conduct. We reserve the right to monitor and inspect how our assets are used by Staff including inspection of data, files and email kept on the personal computers or other devices.

### **(b) Confidential Information**

The nature of each Staff's work in the Group would sometimes involve him/her having access to trade secrets, product formulae, information gathered or imparted in confidence, files and records of the company pertaining to the Group's business which the Group regard as secret and confidential in order to safeguard its legitimate business interests. All information obtained in the course of engagement and/or employment with the Group shall be deemed to be strictly confidential and shall not be disclosed, revealed, divulged or made known to any third party(ies) unless in the proper performance of his/her duties and only if expressly directed or permitted to do so in writing by the Group. This measure applies to all Staff both during and after the service with the Group.



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Personal records and remuneration including the Staff's own remuneration are classified as Private and Confidential Information and shall not be divulged.

Upon termination of employment for whatsoever reasons, the Staff shall forthwith deliver to the Group, all notes, records and any data relating to the Group's Confidential Information. The services of the Staff may be terminated with or without notice in the event he/she breaches his/her obligations under this Confidential Information article. The Group reserves the right to bring an action for injunction and damages against the Staff for any breach or threatened breach of disclosure of Confidential Information after termination of service.

Staff shall not, without the prior consent of the Group, give evidence at or adduce any documents in any legal proceedings in any action involving the Group, for or on behalf of any party to the proceedings other than the Group itself.

Staff and his/her spouse shall not be allowed to work in the same Section or Department in the Company unless with the approval from the Group Chief Executive Officer. If this approval is not granted, the Group Executive Committee member may transfer one of the spouse to any other suitable job in any Section or Department in the Company.

### **(c) Company Records and Internal Controls**

The Group's records must be prepared accurately, timely and honestly, both by accountants who prepare financial statements and by Staff who contribute to the creation of business records, for example, by submitting expense records, time sheets, order and invoice records. The Group takes obligation to maintain business records for operational, legal, financial, historical and other purposes seriously and takes appropriate steps to ensure that the content, context and structure of the records are reliable and authentic.

Reliable internal controls are critical for proper, complete and accurate accounting and financial reporting. Staff must understand the internal controls relevant to their positions and comply with the policies and procedures related to those controls to ensuring that effective and reliable business processes are in place.

### **(d) Data Privacy and Data Protection**

The Group respects the privacy of staff, customers, suppliers and other business partners and will observe and comply with all applicable laws and regulations as well as internal policies whenever collecting, processing, storing, disclosing or disposing of personal information.

### **(e) Press Release, Public Statements and Social Media**

Except with the permission of the Group, a Staff shall not make any unauthorised public statement, circulate, divulge or communicate with any customer, member of the public, media or government or statutory bodies on the policies or decision of the Group on any issue, or any other information or details in respect of the Group's business. This applies to disclosures by any medium, including the internet, especially via social media sites (e.g.

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Facebook, X, YouTube, etc.), internet message boards and/or blogs. Staff must take precautionary steps to prevent the unauthorised disclosure of proprietary or confidential information, including protecting and securing documents containing this information.

Staff who make public statements about the Group may influence the image of the Group especially in relation to stakeholders such as business partners, competitors, media and others. Staff may express their private opinion in public, however, they must never imply that they are speaking on behalf of the Group and this applies especially when using social media, no matter on which platforms. Care must be taken whenever staff do any posting or comment on sensitive issues as this could impact on company and staff negatively. Staff are strictly prohibited from posting or writing any messages or material that is intended to harm the reputation of the Group on any social media platforms including but not limited to blogs, WhatsApp, WeChat, Facebook, LinkedIn, X, Instagram, YouTube, TikTok.

### **(f) Publications**

Staff are not permitted to publish or distribute any written or printed form, articles, journals, brochures and any other materials that contains information pertaining to the Group without prior approval of the Group.

### **(g) Guest Speaker or Panelist in Public Events**

In the event that any Staff has been invited to appear as guest speaker or panelist in any public forum, seminar or events, the Staff is required to submit the details of the topic to be discussed or content of the presentation to the immediate superior for the Management's consideration and approval. Upon approval being granted, only the Staff is allowed to participate in such event.

## **11. Business Ethics**

### **(a) Anti-Bribery and Anti-Corruption**

Bribery and corruption are prohibited by law in almost all countries in which the Group conducts its business in. The Group is committed to conduct business in accordance with the highest ethics, accountability and transparency standards. The Group has adopted a zero tolerance towards all forms of corruption by any party or stakeholder or Staff acting for the Group or on behalf of the Group.

Consequently, Staff shall never offer, give, receive or solicit any form of bribe in order to achieve any business or personal advantage for themselves or others or engage in any transaction that contravenes any applicable anti-corruption laws and regulations. A bribe occurs when someone attempts to influence a decisions or actions by offering some form of undue or improper advantage, incentive or favour. Staff should not participate in any corrupt or unethical activity such as but not limited to extortion, abuse of power, trading under influence fraud and/or money laundering.

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### **(b) Gifts, Gratuities and Entertainment**

Each and every Staff must not accept entertainment, gifts, or personal favors that could, in any way, influence, or appear to influence, business decisions in favor of any person or organisation with whom or with which the Group has, or is likely to have, business dealings as such acceptance may present potential conflicts of interest.

The Staff must not accept any other preferential treatment under these circumstances because their positions with the Group might be inclined to, or be perceived to, place them under obligation to return the preferential treatment.

While business courtesies are to be encouraged, the Group prohibits acceptance or receipt by any Staff of any gift, gratuity, entertainment or other item of monetary value from the Group's suppliers or customers.

Staff should never accept gifts, services or entertainment that may reasonably be deemed to affect their judgment or actions in the performance of their duties. However, when circumstances make it impractical for the Staff to refuse a gift, the gift should be handed over to a member of the Group Executive Committee member or Human Resource for decision to handle.

Similarly, the Staff must not corruptly give, agree to give, promise or offer to any person any gratification and any statutory modification, amendment or re-enactment thereof for the time being in force) whether for the benefit of that person or another person with intent to obtain or retain business for the Group or to obtain or retain an advantage in the conduct of business for the Group.

Please refer to Anti-Corruption Policy which aims to regulate the No-Gift Policy at our HARPS' website.

### **(c) Anti-Money Laundering**

Money laundering is the process of concealing, converting and transferring proceeds from unlawful activities to a legitimate source of income or asset. Money laundering is an offence under national and international law.

Staff shall be aware of the applicable anti-money laundering laws and shall seek to ensure they are appropriately and adequately informed of developments in the laws relating to this area in order to actively pursue the prevention of money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities. Staff are expected to be mindful of the risk of the Group's business being used for money laundering activities and to raise any suspicious transactions to their immediate superior and the Group Executive Committee member to undertake further investigation. No disclosure should be made to others that would indicate suspicions of money laundering. Any Staff reporting should not discuss the matter with any other person.

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### **(d) Anti-Trust and Fair Competition**

We are committed to comply with the applicable anti-trust, competition and fair-trade laws and regulations in the countries where we conduct our business. Moreover, the Company is obliged to ensure its operating activities and its relationship with any business partner is fair, transparent and honest. This includes any form of transaction or termination of relationship. All commercial transactions shall be recorded and documented. Corrupted practices are not allowed either directly or indirectly.

We should never agree with competitors, customers or suppliers either formally or informally on:

- Exchanging information regarding pricing, policies, marketing plans, costs, or other competitive datas
- Dividing market, sales territories, products or customers
- Raising, setting or fixing prices
- Resale pricing
- Influencing the outcome of competitive bidding
- Preventing other company from entering the market
- Refusal to deal with particular competitor, customer or supplier

It is a common business practice that we gather information about our customers, competitors and related parties. All competitive information must be collected through legal and ethical means such as published news or press releases, website, customer feedback, research, trade shows or publications.

We must know and comply with those laws and regulations that's applicable to our jobs. When in doubt as to the legality of any proposed action or agreement, we should seek advice from local legal counsel.

### **(e) Trade Control and Economic Sanctions**

The export controls and economic sanctions regulate where and with whom we can do business. The Group is committed to comply with the applicable trade control and customs laws and regulations of the countries and regions where we conduct our business. Failure to comply can affects our business reputation, significant fines and loss of export privileges.

Staff needs to be aware of the countries that periodically impose restrictions on imports, exports, other dealings with certain countries, persons or groups and Staff should act within the parameters set by the various sanctions regimes.

The Group maintains a clear policy on dealing with sanctioned countries to ensure that our business dealings do not contravene applicable sanctions rules. All imports and exports are declared correctly and transparently to the relevant authorities.

We select third parties that we work with (including agents and distributors, if any) very carefully to ensure that they share in our commitment to do business legally and ethically.

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In the event faced with a scenario that we are unsure or feel uncomfortable with, Staff shall refer the case to our Management team for further advice.

### **12. Staff Ethics**

#### **(a) Exclusive Service**

The Group expects each and every Staff to give their fullest attention, dedication and efforts when executing their duties for the Group. Staff must avoid any personal, financial or other interest which may be in conflict with their duties and responsibilities to the Group. In this respect, Staff is not permitted to be gainfully employed, either directly or indirectly in any capacity, in any trade by any other organisation, company or business concern or occupation (except being a shareholder or debenture holder in a public company) other than the Group without prior written consent of the Group Chief Executive Officer. Such permission will not be unreasonably withheld unless it has an impact on the Staff's ability to perform his/her normal duties or his/her performance at work or for an organisation which is in direct competition with the Group; in which case, such permission will be revoked immediately and disciplinary action including termination may be taken against the Staff who breaches this article.

#### **(b) Integrity and Professionalism**

Staff should remember that they are a reflection on the Group and are constantly being judged and otherwise appraised by everyone they come in contact with. All Staff should conduct themselves with the highest degree of integrity and professionalism in the workplace or any other location while on Group's business.

#### **(c) Personal Appearance**

Staff who are provided with uniforms by the Group shall wear them in full at all times while at work. Staff are expected to be suitably and neatly dressed so as to maintain an appropriate appearance that is business like, neat and clean, as determined by the requirements of the work area. Dress and appearance should not be offensive to customers or other Staff. Dress, grooming and personal cleanliness standards are important and contribute to the morale of all Staff and affect the business image to the Group's customers and visitors.

#### **(d) Conflict of Interest**

The Group expects that the Staff will perform their duties conscientiously, honestly, and in accordance with the best interests of the Group. Staff must take care to separate their personal roles from their company positions when communicating on matters not involving the Group's business. When Staff are faced with a conflict-of-interest situation, they are required to disclose their interest to their immediate superior and submit the necessary form.

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### **(e) Insider Dealing**

No Staff who are in the possession of non-public price sensitive information of the Group or other listed company gained in the course of employment with the Group may deal or advise any other person to deal in any securities of the Group or any securities of another listed company. No Staff shall disclose non-public price sensitive information to any person (including family members) where such information may be used by such person to his or her profit by trading or in recommending or advising others to trade in any securities of company.

Staff must ensure that all transactions in the Group securities comply with the procedures set out in the local and national law on trading.

### **13. Sustainability**

The Group is cognizant of the responsibilities of maintaining a sound environmental, social and governance (“ESG”) framework taking into account the dynamic and continuously evolving environment in which we operate. As part of our sustainability process, we adopt policies, procedures and code of conduct to discharge our responsibilities in areas relating to ESG whilst addressing the pertinent interests of our diverse stakeholders.

In the journey towards sustainable value creation, our Group continuously identifies initiatives to drive our Group’s sustainability aspirations whilst ensuring adequate considerations are placed in responding to economic, environmental and social risks and opportunities arising. The continuous identification, evaluation, monitoring and managing of risks and opportunities across the economic, environmental and social facets has ensured our Group manages all material sustainability matters through our business operations including stakeholder engagement and materiality assessment. As there is no “one size fits all” approach, our Board adopts a sustainability development approach that fits our Group’s purpose taking into consideration amongst others, our culture, needs, sustainability-related risks and opportunities and level of maturity of our sustainability intellect and readiness.

#### **(a) Health and Safety**

The Group takes appropriate precautions to prevent injuries or adverse working conditions for each and every Staff. It is the responsibility of each and every Staff to adhere to the prescribed safety rules and acts as well as to raise any concerns which may represent potential threats to health and safety. Staff are responsible for reporting injuries and unsafe work practices or conditions as soon as they are being discovered or become known.

#### **(b) Environment**

The Group conducts operations in a manner that safeguards health, protects the environment and work to reduce carbon footprint. The Group is committed to protecting the environment by minimizing and mitigating environmental impacts throughout the life cycle of operations. Staff should contribute to minimizing the use of finite resources, including energy, water and raw materials. Staff should minimize harmful emissions to environment, including waste, air emissions and discharges to water.

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### **14. Violations of Code of Conduct**

#### **(a) Raise A Concern and Speak Up**

All Staff of the Group who suspect violations of this Code have an obligation to report its violations to supervisors, managers, HODs or Head of Human Resource about the known or suspected illegal or unethical behavior using local internal HR grievance mechanism.

The Staff shall promptly report any known or suspected violations of this Code to the Group Chief Executive Officer, who will in turn consult with Human Resource Department (where necessary). All allegations of improper conduct in regard to this Code will be investigated immediately. All investigation will be conducted in the strictest of confidence.

The Group has also established a Whistle-Blowing Policies & Procedures that provides an anonymous, secure and confidential communication channel for employees to raise genuine concerns or report any misconduct or wrongdoings. The provision, protection and procedure of the Whistle-Blowing Policy & Procedures for reporting of the violation of the Code are available on the HARPS' portal. Please visit the HARPS website for this Whistle Blowing Policies & Procedures - AC P&P ([harps.com.my](http://harps.com.my)).

Apart from the above, in the pipeline is the launching of a helpline, "RBA Voices", a worker voice platform that gives Staff an alternative way to provide feedback or raise concerns to an independent third-party and is available in multilingual. We will be sharing more information on this soon.

#### **(b) Non-Retaliation**

The Group makes every effort to maintain the confidentiality of any individual who reports concerns and possible misconduct. Staff who retaliate or encourage others to do so will be subjected to disciplinary actions, up to and including termination of employment or engagement. The Company does not tolerate any form of retaliation against anyone who makes a report in good faith.

#### **(c) Investigations and Audits**

The Group shall investigate reported concerns promptly and confidentially with the highest level of professionalism and transparency. All internal investigations and audits are conducted impartially and without predetermined conclusions. Each and every Staff shall be expected to cooperate fully with audits, investigations and any corrective action plans, which may include areas for continued monitoring and assessment.

Where external investigations are required, every Staff shall appropriately respond to, cooperate and shall not interfere with, any lawful government inquiry, audit or investigation.

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### **15. Periodic Review**

This Code should be reviewed periodically by the Directors in accordance with the needs of the Group and be communicated to all levels of Staff on the new changes. This Code is available on the HARPS' website.