



KAYA HOUSE

SING KEE KAYA LTD

CODE OF CONDUCT

This Code of Conduct sets out the principles and standards which the Board, management and employees of Sing Kee Kaya Ltd (**Company**) are encouraged to strive towards when dealing with each other, shareholders and the broad community.

1. Responsibility to Shareholders

The Company aims to:

- (a) increase shareholder value within an appropriate framework which safeguards the rights and interests of the Company's shareholders and the financial community; and
- (b) to comply with systems of control and accountability which the Company has in place as part of its corporate governance with openness and integrity.

2. Integrity and Honesty

Directors, management and staff shall deal with the Company's customers, suppliers and competitors and each other with the highest level of honesty, fairness and integrity and observe the rule and spirit of the legal and regulatory environment in which the Company operates.

3. Respect for the Law

The Company is to comply with all legislative and common law requirements which affect its business. Any transgression from the applicable legal rules is to be reported to the Company Secretary as soon as a person becomes aware of such transgression.

4. Conflicts of Interest

Directors, management and staff must not involve themselves in situations where there is a real or apparent conflict of interest between them as individuals and the interest of the Company. Where a real or apparent conflict of interest arises, the matter should be reported to:

- (a) the chairperson in the case of a Board member;
- (b) the Board in the case of the chairperson;
- (c) the Company Secretary in the case of a member of management; and
- (d) a supervisor in the case of an employee,



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so that it may be dealt with and dealt with in an appropriate manner for all concerned.

5. Protection of Assets

Directors, management and staff must protect the assets of the Company to ensure availability for legitimate business purposes and ensure all corporate opportunities are enjoyed by the Company and that no property, information or position belonging to the Company or opportunity arising from these are used for personal gain or to compete with the Company.

6. Confidential Information

Directors, management and staff must respect confidentiality of all information of a confidential nature which is acquired in the course of the Company's business and not disclose or make improper use of such confidential information to any person unless specific authorisation is given for disclosure or disclosure is legally mandated.

7. Employment Practices

The Company will employ the best available staff with skills required to carry out vacant positions.

The Company will ensure a safe work place and maintain proper occupational health and safety practices commensurate with the nature of the Company's business and activities.

8. Responsibility to the Community

The Company will recognise, consider and respect environmental issues which arise in relation to the Company's activities and comply with all applicable legal requirements.

9. Responsibility to the Individual

The Company recognises and respects the rights of individuals and to the extent of its ability will comply with the applicable legal rules regarding privacy, privileges, private and confidential information.

10. Fair Trading and Dealing

The Company will deal with others in a way that is fair and will not engage in deceptive practices.

11. Insider Trading

Directors, management and staff must observe the Company's Securities Trading Policy. In conjunction with the legal prohibition on dealing in the Company's



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securities when in possession of inside information relating to the securities of the Company, the Company has, among other things, established blackout periods when Directors, Management and staff are not permitted to deal in the Company's securities.

12. Compliance with the Code of Conduct

Any breach of compliance with this Code is to be reported to the Company Secretary or chairperson, as appropriate.

13. Periodic Review of Code of Conduct

The Company will monitor compliance with this Code of Conduct periodically by liaising with the Board, management and staff especially in relation to any areas of difficulty which arise from this Code of Conduct and any ideas or suggestions for improvement to it.