



Business to Business e-Solutions

Code of Conduct and Ethics Policy

The purpose of this document (Code) is to outline the principles to guide standards of behaviour and business conduct for the Group.

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Objective, Scope & Definition



Objective

The purpose of this document (Code) is to outline the principles to guide standards of behaviour and business conduct for the Group.

Scope

This code applies to all employees, Directors, and officers in conjunction with all other applicable or related policies, procedures, and guidelines.

Definition

Abbreviation

Code

— Code of Conduct and Ethics

The Group

— B2BE Group of Companies

Code of Conduct and Ethics Statement

The Group and its policies require its employees at all levels, Directors, and officers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

Employees at all levels, Directors, and officers must practice fair dealing, honesty, and integrity in every aspect of dealing with colleagues, the public, the business community, customers, suppliers, competitors, and government authorities.

When acting on behalf of the organisation, employees at all levels, Directors, officers shall not take unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or other unfair-dealing practices. Organisation policy prohibits unlawful discrimination against employees, shareholders, Directors, officers, customers, or suppliers on account of race, color, age, sex, religion, or national origin. All individuals shall be treated with dignity and respect, and they shall not be unreasonably interfered with in the conduct of their duties and responsibilities.

No employees at all levels, Directors and officers should be misguided by any sense of loyalty to the organisation or a desire for profitability that might cause him or her to disobey any applicable law or organisation policy. Violation of the organisation's policy will constitute grounds for disciplinary action, including, when appropriate, termination of employment.



Roles & Responsibilities



Directors, and all levels of employees

- Understand and comply with this Code;
- This Code is not all encompassing for every ethical situation. When necessary, employees are responsible to seek further guidance and clarification from their heads of department.

Ethical and Business Practices

Accounting Controls and Records

The Group's policies and applicable laws require accurate books and record keeping that fairly reflect its transactions and the dispositions or acquisition of its assets.

Fraud and Similar Irregularities

The Group's policies prohibit fraud and establishes procedures to be followed concerning the recognition, reporting and investigation of suspected fraud.

Sensitive Transactions

The Group's policies prohibit its employees at all levels, Directors, officers, and agents from disclosing any sensitive information to third parties or entering into sensitive transactions or agreements which are unlawful and/or do not comply with the Group's standards, policies, and regulatory compliances.



Duties of Good Faith, Diligence, and Integrity

Bribery and Corruption:

The Group is committed to acting professionally, fairly, and with integrity in its business dealings and relationships wherever it operates. The Group's policy prohibits offering, soliciting, or accepting any forms of commercial bribes, kickbacks, and other similar payoffs and benefits paid to achieve any business or personal advantage for themselves or others, or engage in any transaction that contravenes any applicable anti-bribery or anti-corruption laws.

Conflict of Interest:

The Group prohibits conflicts of interests between its employees, the Group, and/or any other parties they may deal with. The Group is committed to identifying and addressing any potential conflicts of interest and sensitive situations that may happen during the conduct of its business.

Compliance with Laws:

The Group is committed to doing business the right way, by acting ethically with this Code, its policies, and any applicable regulations.

Money Laundering:

The Group do not tolerate direct or indirect economic crime especially money laundering.

Whistleblowing:

The Group encourage employees, Directors, officers, clients, consultants, other parties of the Group to disclose suspected wrongdoings which may involve or concern our Group's Directors, its management, employees, performance, relations with other stakeholders, assets, and reputation.

Workplace Culture and Environment

Bullying and Harassment:

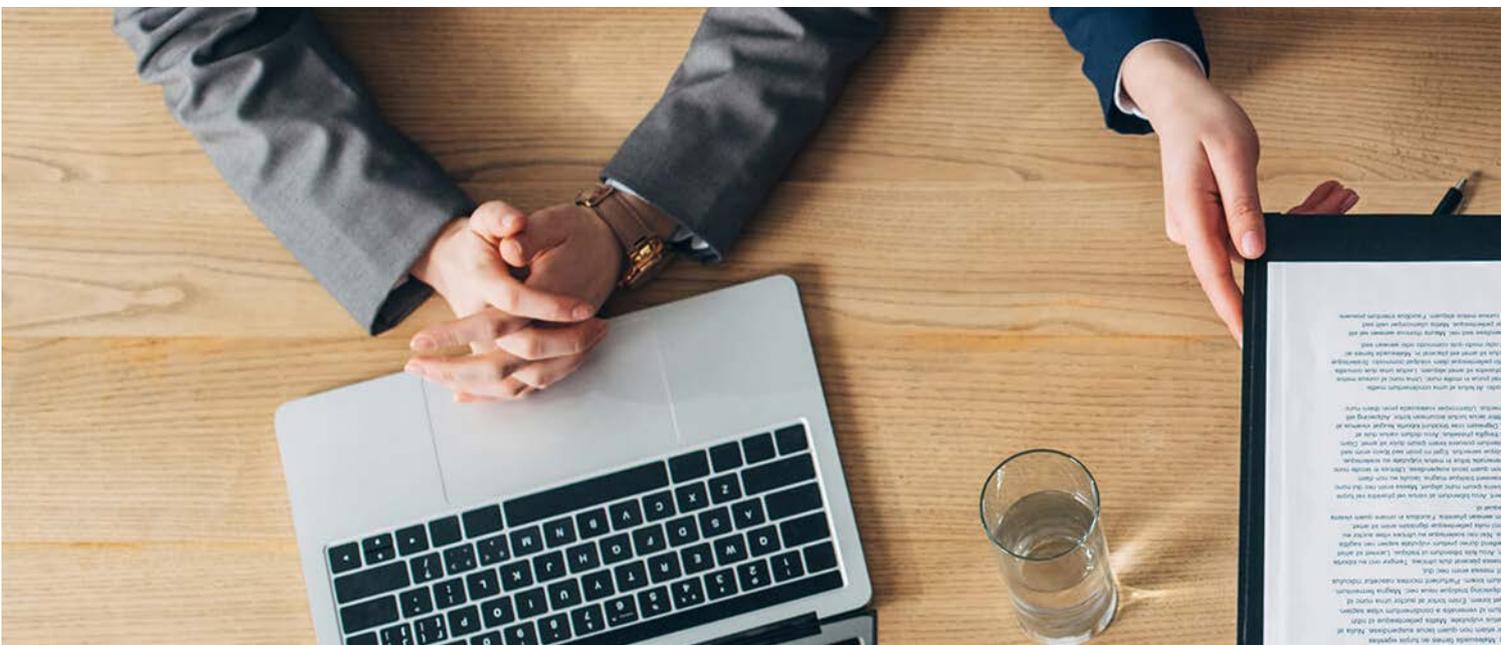
The Group do not tolerate bullying and harassment. The Group strives to provide a safe working environment where everyone is treated with respect and free from abuse, threat, harassment, intimidation, isolation, cyber bullying, or any other inappropriate behavior.

Employing Minors:

The Group prohibits the full-time employment of minors, and any form of child labor within the Group, its subsidiaries, and its suppliers.

Equal Opportunity and Non-Discrimination:

The Group welcomes people of all backgrounds and provides equal employment opportunity and fair treatment including but not limited to recruitment, compensation, benefits, working conditions, training, rewards, recognition, career development and retirement.



Workplace Health and Safety:

All our employees will conduct their duties and responsibilities in compliance with applicable laws and industry standards relating to health and safety in the workplace in each region the Group operates.

Workplace incidents are taken seriously; the Group will investigate, and appropriate measures are taken to prevent recurrence.

Commitment to Environment Sustainability:

Protection of health, safety, and the prevention of pollution to the environment are primary goals of the Group. The Group is committed to provide products and services that have no undue environmental impact and are safe in their intended use, efficient in their consumption of energy and natural resources and can be recycled, reused, or disposed of safely.

The Group, we are fully committed to transition our businesses and operations to a digital and paperless environment. The Group is also committed to help other organisations to transition to a paperless environment through the use and consumption of the Group's products and solutions, which in turn reduces the consumption of natural resources.

