

ASIA CAPITAL PLC

Policy on Internal Code of Business Conduct

Contents

1. Purpose:	2
2. Compliance with Laws and Regulations:	2
3. Ethical Conduct:	2
4. Conflicts of Interest:	2
5. Protection of Company Assets:	2
6. Confidentiality:	2
7. Fair Competition:	2
8. Anti-Bribery and Anti-Corruption:	2
9. Accuracy of Records and Financial Reporting:	2
10. Health and Safety:	3
11. Respectful Workplace:	3
12. Trading in Listed Securities:	3
13. Reporting Violations:	3
14. Disciplinary Actions:	3
15. Training and Communication:	3
16. Review and Updates:	3



1. Purpose:

The purpose of this Internal Code of Business Conduct and Ethics ("Code") is to establish the standards of behavior expected of Directors and Employees of Asia Capital PLC. This Code is designed to promote integrity, transparency, and ethical conduct in all aspects of company business activities.

2. Compliance with Laws and Regulations:

Directors and employees must comply with all applicable laws, regulations, and policies relevant to the organization's operations.

3. Ethical Conduct:

Directors and employees are expected to conduct themselves ethically, with honesty, integrity, and fairness in all business interactions.

4. Conflicts of Interest:

Full disclosure of any actual or potential conflicts of interest is required. Directors and employees must avoid situations that may compromise their objectivity in decision-making.

5. Protection of Company Assets:

Directors and employees are responsible for protecting the organization's assets, including intellectual property, proprietary information, and physical resources.

6. Confidentiality:

Directors and employees must maintain the confidentiality of non-public information, both during and after their association with the organization.

7. Fair Competition:

Directors and employees must promote fair competition and comply with anti-trust and competition laws. Unfair business practices, such as price fixing or collusion, are strictly prohibited.

8. Anti-Bribery and Anti-Corruption:

Directors and employees shall not offer, give, receive, or solicit bribes or participate in corrupt practices. The organization is committed to compliance with all anti-bribery and anti-corruption laws.

9. Accuracy of Records and Financial Reporting:

Directors and employees must ensure the accuracy and completeness of all records, financial reports, and other public communications. Deliberate misinformation is strictly prohibited.



10. Health and Safety:

Directors and employees are responsible for maintaining a safe and healthy work environment. Any concerns about safety hazards must be reported promptly.

11. Respectful Workplace:

The organization promotes a diverse and inclusive workplace. Directors and employees are expected to treat each other with respect, free from discrimination, harassment, or retaliation.

12. Trading in Listed Securities:

Directors and employees who have access to non-public information about the organization's financial condition, performance, or other material developments are prohibited from trading in the organization's securities until such information is publicly disclosed.

13. Reporting Violations:

Directors and employees are encouraged to report any known or suspected violations of this Code promptly. The organization will not tolerate retaliation against individuals who make good-faith reports.

14. Disciplinary Actions:

Violations of this Code may result in disciplinary action, up to and including termination of employment or removal from the Board of Directors.

15. Training and Communication

Regular training and development in respect of Internal Code of Business Conduct will be provided to employees and Directors.

16. Review and Updates:

This Code will be reviewed periodically and updated as needed to reflect changes in laws, regulations, or organizational practices.

Asia Capital PLC Internal Code of Business Conduct and Ethics Adoption:

This Code was adopted by the Board of Directors on [Date].

[Signature of Board Chair] [Date]

[Signature of Managing Director] [Date]