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| Document Number | AS-BM-PR-02 |
| Version Number | 02 |
| Prepared by | V. PSELVEM |
| Approved By | R. BHOJ |
| Released Date | 05 AUG 2020 |

TITLE: CODE OF CONDUCT

DOCUMENT NUMBER: AS-BM-PR-02

APPROVING AUTHORITY: R. BHOJ

REVISION HISTORY

| Version Number | Summary of changes made | Approved By | Approved Date |
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| 01 | Policy released | R. BHOJ | 01 JAN 20 |
| 02 | Change to the company group member list | R. BHOJ | 05 AUG 20 |
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This policy applies to the following group of companies (hereinafter collectively and individually referred to as the COMPANY):

Aroona Solutions Sdn Bhd. – Malaysia

Aroona Solutions Integrated Sdn Bhd. – Malaysia

Aroona Energy Solutions (M) Sdn Bhd. – Malaysia

PT Aroona Solusi – Indonesia

Aroona Solutions Australia Pty Ltd. – Australia

Blueline Solutions – India

Deepsea Offshore and Marine Pte Ltd. – Singapore



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1 PURPOSE

The purpose of this Code is to outline the behaviour and expected conduct required of all COMPANY team members.

2 SUMMARY

The COMPANY requires the upmost integrity of team members at all times with integrity being a cornerstone of our business. The COMPANY is committed to ethical business practices and to obeying the law wherever it does business. In order to ensure the integrity of our business and relationships with our clients and partners, the COMPANY strictly prohibits bribery or any other improper payments in business dealings. While bribery or unethical business practices may be a customary practice in locations, it is not a justification for violation of this Code or tolerated under any circumstances.

The Executive Management of each COMPANY fully supports this Code and require full compliance with its terms from every team member.

3 DEFINITIONS

List of definitions and abbreviations:

Anything of value: Includes, but is not limited to: cash, cash equivalents (such as gift cards, kickbacks or discounts), benefits or favours, entertainment, gifts, hospitality, meals, travel, charitable contributions, political contributions or employment opportunities. There is no minimum value for something to be considered 'of value'.

Bribery (or bribe): Giving, offering, promising, requesting, or authorizing the giving of anything of value, directly or indirectly, to any person or entity to induce a person to act, or refrain from acting, in relation to the performance of their duties, in order to obtain or retain any advantage or benefit.

Executive Management: The Executive Management team of each COMPANY consists of all director level and board positions.

Facilitating payments: Payments made to public officials to encourage them to expedite a routine or common governmental task that the official is otherwise required to undertake even if the payment were not made, such as issuing permits or licenses.

Gift: Includes any tangible object of any kind, regardless of value.

Hospitality: Meals, lodging, or any event or form of entertainment (including sporting events, parties, plays and receptions).

Money laundering: Occurs when the criminal origin or nature of money or assets is hidden in legitimate business dealings when legitimate funds are used to support criminal activities and terrorism.



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Public official: A government official, whether elected or appointed; an officer or employee of a government agency or state-owned or state-controlled entity; a person performing a public service on behalf of a government or government agency; a political party or party official; a candidate for political office; any person acting in an official capacity; or an officer or employee of a public international organization.

Team member: All employees, whether permanent, fixed term, or temporarily employed either directly by the COMPANY or through an agent on behalf of the COMPANY.

Third party: Any person or entity who acts on behalf of or represents the COMPANY, including but not limited to sales agents or representatives, distributors, consultants, lobbyists, transportation or logistics providers, customs clearing agents, or any person or entity retained to represent the COMPANY in a matter before a public official, government agency, or in tax or legal matters.

Travel: All forms of transportation, including ground transit and air travel.

4 APPLICATION OF POLICY

If a local law conflicts with a policy in the Code, the local law takes precedence. If a local custom or practice conflicts with a policy in the Code, the Code takes precedence.

The Code provides general guidance for resolving a variety of legal and ethical issues. Team members are also expected to comply with other applicable policies, procedures, guidelines, directives, rules and practices issued by the COMPANY. Team members are expected to apply sound judgment in deciding on ethical means of dealing in any given situation involving customers, business partners, competitors, regulators, the public and COMPANY matters in general and ask for help when needed. The Code may be reviewed, changed and updated from time to time which we are expected to comply and be bound by it.

5 THE CODE

RESPONSIBILITY AND COMPLIANCE TO THE CODE

COMPANY team members, and COMPANY third parties are expected to:

- understand and comply with the Code;
- ensure all subordinates understand and comply with the Code;
- uphold and exercise COMPANY values;
- exercise good ethical values; and
- be accountable for behaviours of the subordinates in failing to comply with the Code and other applicable policies, procedures, guidelines, directives, rules and practices.

All team members are bound by the Code through its incorporation in their employment contract. Failure to abide by the Code may result in team members being subjected to disciplinary actions including but not limited to withholding of bonuses, increments and merit awards, denial of promotion and termination or dismissal of employment.



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We also expect our Business Partners to understand and comply with the relevant aspects of the Code. Violation of the Code may result in blacklisting or termination of their contract by the COMPANY.

The Code cannot anticipate every situation that may arise and as such team members should conduct business in accordance with COMPANY values and the spirit of the Code. When faced with an uncertain situation, you are expected to seek guidance from your supervisor or the Executive Management before acting.

TRUST AND CREDIBILITY

The success and performance of the COMPANY is dependent on the trust and confidence in our team members. Trust and credibility are earned through adherence to our values and conducting business at all levels with honesty and integrity.

RESPECT FOR THE INDIVIDUAL

All team members deserve to work in an environment where they are treated with dignity and respect. Such an environment creates a safe workplace allowing team members to reach their full performance potential. The COMPANY is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behaviour. Team members who feel harassed or discriminated against are required to report the incident to their supervisor or where not appropriate, to the Executive Management who will ensure all reports of unacceptable behaviour are handled appropriately, swiftly and in confidence.

OPEN AND HONEST COMMUNICATION

All team members are empowered to raise any concerns they may possess regarding practices or incidents which do not align with the Code. Managers have a responsibility to create an open and supportive environment where team members feel comfortable raising such concerns.

The Executive Management will investigate all reported instances of unethical behaviour or behaviour which does not align with the Code. In every instance where improper behaviour is found to have occurred, The COMPANY will take appropriate action. The COMPANY will not tolerate retaliation against team members who raise ethics concerns in good faith.

LEADERSHIP EXPECTATIONS

Executive Management have the responsibility for demonstrating through their actions, the importance of the Code. Ethical behaviour does not simply happen; it is the product of clear and direct communication of behavioural expectations, modelled from the top and demonstrated by example.

To ensure compliance with the Code, all managers must promptly address ethical concerns raised by team members and ensure action to deal with such issues. Managers should not consider ethical



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concerns as threats or challenges to their authority, but rather as another encouraged form of business communication aimed at ensuring the performance of the COMPANY.

FRAUD AND SIMILAR IRREGULARITIES

The COMPANY strictly prohibits fraud and will take stern action on team members found to have committed acts of fraud. *Stern action may include instant dismissal.* Fraud includes but is not limited to:

- bribery and corruption;
- acts of dishonesty;
- fraudulent acts;
- forgery of company documents and negotiable instruments;
- misappropriation of funds; and
- misuse of COMPANY assets.

The above list is not exhaustive and shall include any other acts deemed inappropriate. Irregularities concerning team member's moral, ethical or behavioural conduct shall be resolved by the Executive Management. In determining whether an act is inappropriate, team members should consider whether the conduct is consistent with the spirit of the Code and COMPANY values.

BRIBERY AND FACILITATING PAYMENTS

The COMPANY, its team members, and third parties must comply with all anti-bribery and anti-corruption laws and regulations, domestic and international and treaties of the countries where we do business.

The COMPANY, its team members, and third parties are prohibited from accepting or soliciting, giving or offering any form of gratification as an inducement or reward to do or forbear any act in relation to any matter in which any Business Partners, friends or families has an interest whether directly or indirectly. Our customers are also prohibited from offering and/or giving any form of gratification to us as an inducement or reward for us to use our office or position when making any decision, or take any actions in relation to any matter in which the business partners, friends or families have an interest whether directly or indirectly.

The COMPANY, its team members, and third parties are prohibited from requesting or receiving a bribe, directly or indirectly, from any person or entity. All demands for bribes or kickbacks must be expressly rejected.

The COMPANY, its team members, and third parties prohibited from offering or making facilitating payments to public officials.

If a COMPANY team member or third party believes there is a serious threat to a person's health or safety if a payment demand is not met, such payment would not be considered a prohibited bribe. In that situation, the team member or third party should report the incident to the Executive Management as soon as possible and the payment must be properly recorded in COMPANY books and records.



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Team members and third parties who refuse to pay a bribe will not suffer any adverse consequence as a result, even if the COMPANY loses business. Team members and third parties are required to report any suspected violations of the Code to COMPANY Executive Management and no team member or third party will suffer any adverse consequence for reports made in good faith.

In the event that any request for a bribe is received or any offer for a bribe is being made, it is your duty to submit a report including the full and true description and, if known, the name of the person who solicited, or obtained or attempted to obtain the gratification to the Executive Management. Any offence of accepting, soliciting, giving or offering of any form of gratification will be dealt with under the laws applicable. Reports will be treated confidentially to the extent possible, consistent with the need to conduct a thorough investigation.

MONEY LAUNDERING

The COMPANY, its team members, and third parties must understand the business and background of any prospective entity that wants to do business with the COMPANY. Due diligence needs to be carried out in order to understand the business and background of such entity to determine the services and the origin and destination of money and property of such entity. Any suspicious incidents of money laundering transactions must be reported to the Executive Management. Do not try to investigate any case of money laundering as this may be harmful or hamper any official investigation that may be carried out.

PERSONAL FINANCES

The COMPANY and its team members must not borrow money from or lend money to customers, suppliers, business partners or independent contractors.

The COMPANY and its team members must not be placed under any serious obligation to any person who is directly or indirectly subject to our official authority or with whom we have or likely to have official dealings. Team members remain capable in a personal capacity to borrow money or purchase items on credit from customers or business partners that is in the financial services business, as long as they do not receive preferential treatment and have first obtained authority from the Executive Management.

COMPETITION

In order to ensure its performance, the COMPANY is dedicated to ethical, fair and vigorous competition. The COMPANY sells its products and services based on their superior quality, functionality and competitive pricing. The COMPANY will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for the COMPANY or the sales of its products or services, nor will we engage or assist in unlawful boycotts of customers.



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CONFIDENTIAL PROPRIETARY INFORMATION

The COMPANY, its team members, and third parties are committed to fair and ethical business practices and will not acquire or seek to acquire by improper means a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

The COMPANY, its team members, and third parties, must not disclose any confidential and proprietary information to anyone outside of the COMPANY, including family and friends, unless officially authorised to do so by the COMPANY. If in doubt, find out whether the information is confidential or check with the Executive Management.

All information with different levels of confidentiality should be appropriately managed, handled and stored in accordance to the Information Classification and control measures adopted by the COMPANY.

Examples of confidential and proprietary information include but are not limited to trade secrets, processes, methods, decisions, plans, financial or business forecasts, competitive bids and customer and team member information that is not available publicly.

Where confidential information is to be disclosed to persons outside of the COMPANY, a non-disclosure agreement should be entered into by the parties to ensure that such confidential information is protected.

SELECTIVE DISCLOSURE

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material non-public information with respect to the COMPANY, its business operations, plans, financial condition, results of operations or any development plan. Presentations or proposals to customers should not contain material which is non-public information.

CONFLICTS OF INTEREST

Team members must avoid any relationship or activity that might impair, or appear to impair, the COMPANY's ability to make objective and fair decisions. Team members may be faced with situations where the business actions taken on behalf of the COMPANY may conflict with our own personal interests as the course of action that is best for us personally may not also be the best course of action for the COMPANY. Team members owe a duty to the COMPANY to advance its legitimate interests when the opportunity to do so arises. Team members must never use COMPANY property or information for personal gain or personally take for themselves any opportunity that is discovered through their position with the COMPANY.

Determining whether a conflict of interest exists is not always straight forward. Team members with a conflict of interest question should seek advice from the Executive Management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, team members must seek review from the Executive Management.



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ACCEPTING BUSINESS COURTESIES

Team members must not use their position to request business courtesies, however we may accept unsolicited business courtesies where appropriate to do so. Team members who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must avoid actions that create the appearance of favouritism or that may adversely affect the COMPANY's reputation for impartiality and fair dealing. Team members must refuse a courtesy from a supplier when the COMPANY is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain COMPANY business.

CHARITABLE CONTRIBUTIONS

No charitable donations may be given, offered, promised or authorized without express authorization from the Executive Management. If a donation is authorized, it must fully comply with all applicable laws and be properly and accurately reflected in the COMPANY records.

TRAVEL

All official travel must be made consistent with the principles of this Code and be properly and accurately recorded in the COMPANY 's books, records and accounts. The COMPANY, its team members, and third parties, shall not undertake travel that is not a reasonable and legitimate business expenditure.

All official travel must be directly related to the the COMPANY 's products or services. Any travel expense that does not meet these criteria will not be reimbursed or otherwise paid for by the COMPANY. In order to qualify for reimbursement, the proposed expense must be explicitly detailed in the request, i.e., broken down dates and places of travel, and the amount and type of specific expenses.

GIFTS AND HOSPITALITY

The COMPANY, its team members, and third parties, shall not offer or receive meals, refreshments, entertainment and gifts whenever it could affect the outcome of business transactions or other matters The COMPANY is involved in, or where doing so would be in violation of the laws of the recipient's country.

We may accept occasional meals, refreshments, entertainment, gifts and similar business courtesies that are customary and conform to reasonable ethical practices of the marketplace, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.



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- The team member accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

Customary business entertainment is proper however, impropriety results when the value or cost is such that it could be interpreted as affecting an otherwise objective business decision. Team members with questions about accepting business courtesies should talk to the Executive Management.

The COMPANY reserves the right to deny, in whole or in part, any expenses related to meals, refreshments, entertainment and gifts of a government or political party official (including officers and team members of government-owned or government-controlled enterprises) for any reason.

Team members who authorize the reimbursement or payment of expenses covered by this section without following the above procedures will be subject to disciplinary action, including termination of employment.

OFFERING BUSINESS COURTESIES

Any team member who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon the COMPANY. A team member may never use personal funds or resources to do something that cannot be done with COMPANY resources. Accounting for business courtesies must be done in accordance with approved company procedures.

Other than to our government customers, for whom special rules apply, we may provide non-monetary gifts (i.e., company logo apparel or similar promotional items) to our customers. Further, the Executive Management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of the COMPANY.

ACCURATE PUBLIC DISCLOSURES

We will make certain that all disclosures made in financial reports are full, fair, accurate, timely and understandable. This obligation applies to the COMPANY, its team members, and third parties, in particular those with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.



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CORPORATE RECORDKEEPING

We create, retain and dispose of our company records as part of our normal course of business in compliance with all regulatory and legal requirements. All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with all applicable accounting principles. We must not improperly influence, manipulate or mislead any audit, nor interfere with any auditor engaged to perform an independent audit of COMPANY books, records, processes or internal controls.

USE OF COMPANY RESOURCES

Company resources, including time, material, equipment and information, are for company business use. Occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace. Team members and those who represent the COMPANY are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Team members will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity. Solicitation of team members by non-team members is prohibited at all times. Solicitation by a team member of another team member is prohibited, while either the person doing the soliciting, or the person be solicited is on working time and or Company property. Distribution of materials by team members in work areas or on work time is prohibited.

The COMPANY reserves the right to monitor or review all data and information contained on a team member's company-issued computer or electronic device, the use of the Internet or the COMPANY's intranet. The COMPANY does not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate or that is likely to bring the reputation of the COMPANY into disrepute.

SAFETY AND HEALTH AT WORK

Employer's Obligations. The COMPANY is committed to making the work environment safe and healthy for its team members and others. This is reflected in our QHSSE Management Policy. We shall comply with all applicable laws and regulations relating to safety and health in the workplace.

Team member's Obligations. Safety is the responsibility of everyone at work, including the safety of our own work areas. We must take reasonable care to ensure our safety as well as the safety of our co-workers and others by complying with all applicable QHSSE Policies and procedures adopted by the COMPANY.

Team members must not report to work under the influence of any non-prescribed substance that may prevent work from being undertaken safely, efficiently and effectively.



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Verbal abuse, threats or physical acts of violence or intimidation on fellow team members are strictly prohibited.

ENVIRONMENT

We will respect the environment by complying with all applicable environmental laws in all countries in which we conduct businesses. The COMPANY is committed to the protection of the environment by minimising the environmental impact of our operations and operating our businesses in ways that will foster a sustainable use of the world's natural resources. We must support this commitment by complying with The COMPANY 's QHSSE policy.

We must notify QHSSE if any hazardous materials come into contact with the environment or are improperly handled or discarded.

DRUGS, ALCOHOL AND PROHIBITED SUBSTANCES

Team members are strictly prohibited from the use, possession, distribution or sale of illegal drugs, alcohol or prohibited substances while in the course of the COMPANY 's business. Breach of this provision will result in potential action for dismissal.

WEAPONS

Team members are strictly prohibited from possessing any weapons or illegal materials, imitation or otherwise including but not limited to firearms, explosives or sharp objects in the course of the COMPANY 's business.

DRESS CODE

All team members shall be appropriately dressed in a manner which depicts our professionalism. The appropriate dress code is to be determined with reference their respective positions and locations.

PUNCTUALITY AND TIME

It is the team member's responsibility to report to work on or before their regular or rostered starting time. All team members are also expected to remain at work until the end of their assigned work hours. Should a team member need to leave the workplace to attend to urgent personal matters outside the COMPANY during working hours, they need to obtain prior approval from their supervisor.

Punctuality promotes professionalism, goodwill and respect. Employees should be punctual when representing the COMPANY.

COMPLIANCE

It is the responsibility of each team member to ensure the Code is understood and observed. Managers are responsible for implementing the Code and ensuring compliance with it. Compliance



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of COMPANY team members, and third parties with the code is subject to review at any time by the COMPANY's Executive Management. Team members are expected to bring to the Executive Management's attention any breach or suspected breach of the Code and may make such reports in confidence where possible.

All COMPANY policies and procedures must be strictly adhered to. Failure to do so may result in misconduct and severe disciplinary action may be taken.

Managers should use reasonable care to ensure that effective systems of business controls are in place in their area of responsibility to cover the following:

- Assigning the appropriate authority and responsibility to individuals.
- Proper authorisation of transactions.
- Maintaining accurate and adequate records and documentation.
- Limiting access to confidential assets and information on a need-to-know basis.
- Having independent verifications and approvals.
- Fostering adequate segregation of duties and avoiding any conflict of interest.
- Be alert for any indication of fraud, misappropriation and other irregularities.

TRAINING

COMPANY team members must participate in anti-bribery training on a periodic basis. Team members must certify annually that they have read this policy and that they are acting and will continue to act in compliance with this policy.

BOOKS AND RECORDS

The COMPANY is committed to maintaining complete and accurate records. All transactions, including payments, reimbursement requests, expenditures, expense reports, invoices, vouchers, gifts, and business entertainment must be properly and accurately entered into The COMPANY records in a timely manner, in detail, and with supporting documentation.

AMENDMENTS

The COMPANY reserves the rights to modify this Policy in whole or in part, at any time. The COMPANY team members, and third parties acknowledge that they may not be personally advised of any such modification and are advised to check for any such modification regularly. The COMPANY team members, and third parties hereby unconditionally agree to all such modifications.



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CERTIFICATION OF COMPLIANCE TO THE CODE

I hereby certify that I have read and understood this Code of Conduct (the 'Code') and I understand that the Code applies to all team members and third parties of the COMPANY.

I agree that any business decisions and actions that I am dealing with, shall be based on the best interest of the COMPANY and shall not be motivated by personal interest, considerations or relationships.

My relationships with prospective or existing Business Partners, Customers, Competitors or regulators shall not affect my independent and sound judgment on behalf of the COMPANY.

I certify that I (based on the relevant facts and information, which is to the best of my reasonable knowledge) have shares, conducts business, has other direct or indirect financial interest or liability or serves as an Officer, Director, Committee Member or Employee of any business entity that will have potential interference or affect any of my business decisions and area of responsibilities.

I certify that I do not know of any other matters, including family or personal relationship which might give rise to an apparent or possible conflict of interest involving my present employment.

I certify that I do not perform any activity that conflicts with my official duties.

I am aware of the policies regarding travel, gifts and hospitality from or to any Business Partners with whom I am dealing with, and I certify that I have not violated these prohibitions.

I hereby agree that I will fully comply with all provisions of the Code and understand my responsibility to immediately report any known or possible conflict of interest situations or suspected violations of the Code to Executive Management.

I also certify my understanding that any failure by me to comply with this Code may result in disciplinary action taken against me, including but not limited to withholding of bonuses, increments and merits award, denial of promotion, and termination of my employment.

I CERTIFY THAT THIS STATEMENT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Signature: _____

Name: _____ Date: _____

Designation: _____