

Code of Ethics and Conduct

The Code of Ethics and Conduct of the Globaltec Group of Companies aims to achieve and maintain the highest standard of integrity and probity in dealings with customers and among its employees. It is a guide to the values and principles that all employees should strive to achieve in the course of their work. The Code, while offering practical and ethical guidance for employees who represent the Company, also provide direction to help them deal with ethical concerns that may arise.

The Code ensures that the employees are aware of legal and moral responsibilities in discharging their official duties that every employee understands the values, principles and standards required by the Group. To understand it better, here are some excerpts from the Code: -

1. Employees must at all times act honestly with utmost good faith and act responsibly and professionally in the exercise of his duties and powers in performing his duties towards the Company in any transaction.
2. Employees must have clear understanding of the Company's vision and mission and must work towards achieving the objective.
3. He must be responsible for protection of the Company's good name and image.
4. He is required to protect and not to disclose any trade secrets or any other information of confidential nature relating to the Company or its business or in respect which the Company owes an obligation of confidence to any third party during or after the employee's employment unless and except in proper course of the employee's duties or as required by law.
5. The management must be responsible to provide adequate safety measures and proper protection at the workplace. The employees must observe all safety and health rules and take all precautions to protect themselves and fellow employees from accident, injury and to continuously maintain a safe working environment at the premises of the Company.

CONFLICT OF INTEREST

1. Employees and their immediate family must not have interest in organisations that have or seek to have business dealings with the Company.
2. Employees must not compete with the interest of the Company through outside business activities.
3. Employees must not serve as directors of companies outside the Group except with Board's approval.
4. Employees and their immediate family must not receive any gifts and / or favours of whatever kind from any suppliers except in certain situations laid down in the Code.
5. Employees must not abuse his position in the Company by taking advantage of information obtained by him for his benefit or for benefit of others. Employees are also prohibited to use the Company's name or facilities for personal advantage.

SUSTAINABILITY POLICY

Sustainability to the Group means carrying out our business in a socially responsible and holistic manner with a view to enhancing investor perception and public trust. Our commitment to sustainability is outcomes-based, innovative and founded on the belief that we have a responsibility for our contribution to have a lasting impact on the environment around us. Underpinning sustainability in our business includes focus and attention on:-

- a) Social awareness and betterments;
- b) Environmental preservation; and
- c) Sound and effective corporate governance,

all of which are undertaken in a balanced manner between the interests of various stakeholders. In order to achieve this goal, internal divisions within the Group are tasked to undertake initiatives from time to time in keeping with the policy with the Board of Directors providing leadership on the implementation of such sustainability initiatives.

SOFTWARE COMPLIANCE POLICY

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