

Axis Fiduciary Ltd
Code of Ethics Policy

As approved by the Board of Directors on 12 October 2012 and amended on 13 November 2019

AXIS FIDUCIARY LTD

CODE OF ETHICS

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1. INTRODUCTION

This Code of Ethics (the “Code”) sets out the standards of correct conduct expected of employees of Axis. It emphasizes the importance of a professional, responsible and responsive service and is intended to promote effective and responsible behaviour within the company in a variety of circumstances.

The Code lays down a set of principles and guidelines which aim at instilling a high standard of conduct and behaviour across the Company.

The Code applies to all staff irrespective of grade. It complements any existing guidelines.

2. VALUES AND PRINCIPLES

The Code rests on a number of values and principles which should guide the behaviour and action of employees of Axis so as to inspire confidence and trust. These are:

- Agility
- Excellence
- Integrity
- Trusted

It also recognizes the rights and obligations of employees of Axis according to existing laws and established practice.

3. OBLIGATIONS TO COMPANY

Employees of Axis should:

- carry out decisions efficiently, effectively and economically
- maintain a high standard of performance
- maintain a high standard of professionalism
- maintain confidentiality

4. DUTIES OF EMPLOYEES OF AXIS

In the performance of their duties employees of Axis should work as a team and demonstrate a high degree of professionalism. They should comply with the lawful and reasonable directions given by a person having authority to give such directions. They should behave in a way that brings credit to their position and enhances the reputation of the company.

5. POLITICAL IMPARTIALITY

Employees of Axis should observe political neutrality in their day-to-day functions. They should avoid activities likely to impair, or to be seen to impair, their political impartiality.

6. DIVERSITY

The Company pursues and promotes diversity, respects all employees equally and values the contribution and role of each person. As a principle, the Company does not tolerate bad behaviour, lack of respect, impertinence and discrimination among its employees. Axis recognizes and values the unique contribution people can make because of their individual background and different skills, experiences, lifestyle, education and perspectives.

7. ACCEPTANCE OF GIFTS AND OTHER BENEFITS

Employees of Axis should not misuse their position or information acquired in the course of their duties to further their private interests. They should not solicit or accept for themselves or for others any gift or favour in whatever form which may reasonably be construed as influencing the performance of their duties and might cause a conflict between their personal interests and professional duties or create the appearance of such a conflict. Gifts can in exceptional cases only be accepted when they are offered in good faith, designed for a bona fide and legitimate business purpose, reasonable and not intended to induce or reward to act improperly.

8. CONFLICT OF INTERESTS

Employees of Axis should avoid having any financial or other interest or embark on any undertaking that could directly or indirectly compromise the performance of their duties with the company. They are required to disclose to Management any links whether personal or professional, other interests such as directorship, shareholdings, trusts, etc. which may conflict with their duties within the company, and take steps to avoid such conflicts.

9. INTEGRITY

Employees of Axis should ensure that personal relationships and activities do not compromise the company's objectivity and reputation. Employees of Axis should avoid temptation and not use their position, contacts or knowledge for personal gain. Axis employees' should not allow their personal interests, investments and activities (including those of family members) to conflict with their work or how they serve their clients. Axis has faith in its employee's individual judgment. It is impossible to identify every situation that could create a conflict of interest or the appearance of one so the company relies primarily on the good judgment and integrity of its employees. Any situation that may lead an employee to think that he/she or the company may be in potential conflict of interest should be communicated and discussed with Management.

10. DISCLOSURE OF INFORMATION

Employees of Axis may disclose information or documents acquired in the course of their duties only when they are required to do so by law or when they have the proper authority to do so. In these cases, their comments should be confined to factual information. They should not seek to influence the decisions or actions of Management by unauthorized, improper or premature disclosure of any information or documents to which they have had access as employees of Axis. Except in exceptional cases, or as required by law, employees of Axis should not disclose to any person, or otherwise make use of any confidential information that they have acquired in the course of their employment with Axis or after termination. When dealing with the authorities,

employees should disclose all information which are pertinent and there should be a “come clean” approach. Any query from authorities should be responded without any ambiguity and should fully address the queries raised. The perception of misrepresenting or hiding of information or documents must be avoided at all times. The timeframe to respond should also be short enough to avoid the authorities following up on the response.

11. CONFIDENTIALITY

Axis employees, in whatever capacity, are required to sign a Confidentiality undertaking. Every employee shall observe the strictest confidentiality in respect of any information acquired in the course of his duty or in connection with his employment relating to the affairs or business of the company, any member or employee of the company, the clients of the company or any persons dealing with the company. All information obtained in the execution of the duties entrusted to any employee in the office is always of a confidential nature and not to be divulged to anybody outside the office.

Employees of Axis should not:

- a) allow any unauthorised person to have access to;
- b) give access to any unauthorised person;
- c) give to any unauthorised person the whole or any extract of,

any record, document of a client or material of the company, including any copy of such record, document or material, whether printed, photo static, electronic, or any other form.

12. DATA PROTECTION

The Company and its employees have the obligation to protect the privacy of personal data and comply with the relevant laws applicable. Use and access to personal data is only to the limit of what is necessary for the company and its employees to effectively do their job as part of the services that they are required to provide. There must be a legitimate purpose for any use or sharing of data. Employees of Axis should use and access data responsibly.

13. TECHNOLOGY AND ELECTRONIC DATA

The company's data is secured. Axis secures its technology devices through security software and configurations. Employees of Axis are not allowed to install software or modify configurations that may lead to compromising the company's technology's security. Employees of Axis should conduct digital interactions with professionalism. Axis employees should use the company's provided technology for business purposes, limited and appropriate personal use.

14. USE OF COMPANY RESOURCES

Employees of Axis should ensure that assets and other resources provided to them by the Company are used for company purposes only and are managed scrupulously, properly, efficiently and effectively.

15. OUTSIDE EMPLOYMENT

Employees of Axis should not personally engage in any form of business or employment outside the employment with Axis unless prior approval has been obtained from Management. They should ensure that they do not accept employment or engage in activities which may conflict or interfere with the performance of their duties or cast doubts on their own integrity or that of the company.

16. UNBECOMING BEHAVIOUR

Employees of Axis should not engage in gambling, drinking or substance abuse in such a way as to make them liable to judicial action of any kind and certainly not at the workplace. They should not embarrass colleagues or clients by their attire, their speech or their behaviour.

17. RESPECT FOR THE INDIVIDUAL & HARASSMENT

Axis believes in the respect of the individual. The company condemns abuse and does not tolerate harassment or intimidation within the workplace. Harassment is unacceptable. Employees of Axis are expected to act as good professionals in a professional environment where they can grow and succeed. Harassment in any form based on sex, race, age, colour, national origin, disability and religion is unacceptable. Axis does not accept any form of behaviour that is unwelcome and which offends, humiliates or intimidates a person including, sexual harassment, bullying and victimization.

18. EQUAL OPPORTUNITY

It is the policy of Axis to provide employment equality to all irrespective of gender, marital or partnership status, having or not having dependants, religious beliefs, political opinion, race (including colour, nationality, ethnic origin, and citizenship status), disability, sexual orientation, veteran status or any protected status. Axis is opposed to all forms of unlawful and unfair discrimination. All job applicants, employees and others who work for the company is treated fairly and will not be discriminated against on any of the above grounds. Decisions about recruitment and selection, promotion, training transfers, workforce reduction or any other benefit will be made objectively and without unlawful discrimination. At Axis, equal opportunity and fair treatment extends to all employees. The Company recognizes that the provision of equal opportunities in the workplace is not only good management practice, it also makes sound business sense. Providing and supporting equal opportunities will help all those who work for the company to develop their full potential and the talents and resources of the workforce will be utilized fully to maximize the efficiency of the organisation.

ACKNOWLEDGEMENT

I Mr/Mrs/Ms acknowledge receipt of the Code of ethics policy and confirm that I have read and understood the content therein. I consent to adhere to this policy during my employment with AXIS Fiduciary Ltd and its related companies.

Signature: _____

Date: _____