



HONG FOK CORPORATION LIMITED

(Company Registration No.: 196700468N)

CODE OF CONDUCT

28 MARCH 2017

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1. INTRODUCTION

Hong Fok Corporation Limited ("**HFC**") is committed to conducting its activities with integrity and in a manner which is ethical. Consistent with this commitment, HFC has introduced this code of conduct ("**Code of Conduct**") to set out the general principles and standards of behavior that HFC expects from its employees in their dealings with fellow employees, customers, suppliers and business partners.

2. PRINCIPLES AND STANDARDS

2.1 Employee relations

HFC and its subsidiaries (the "**Group**") is committed to providing a work environment which is conducive to optimal work performance and safe from discrimination and harassment.

All employees and managers, regardless of level, shall endeavour to contribute to the following objectives:

- (a) Respect each employee as an individual, show courtesy and consideration, and foster personal dignity, trust and integrity;
- (b) Encourage each employee to contribute to his/her fullest potential, being neither advantaged nor disadvantaged by identification with any particular group, race, colour, age, gender, sexual orientation, religion, nationality, mental or physical capacity or disability;
- (c) Provide a workplace free of harassment on such basis;
- (d) Provide and maintain a safe, healthy and orderly workplace, in accordance with HFC's health, safety, welfare and environmental policy; and
- (e) Maintain a substance-free environment prohibiting alcohol and drug abuse.

2.2 Fair dealings with customers, suppliers and business partners

The Group values its customers, suppliers and business partners. Employees should always deal fairly with the Group's customers, suppliers and business partners and treat them with honesty and respect. Employees must not take any unfair advantage of anyone through manipulation, concealment, deception, abuse of privileged information or misrepresentation of facts or engage in any other unfair practices.

2.3 Upholding the interests and reputation of the Group

Employees should not engage in any activity that adversely affects the interests and reputation of the Group, including but not limited to, engaging in any act whether in the workplace or otherwise that, in the sole discretion of the Group, involves violent behavior, moral wrongdoings, or which constitutes a criminal act under the applicable laws, regardless of whether the employee is the subject of a criminal charge or not.

- 2.4 Should any provision of this Code of Conduct conflict with applicable laws, the applicable laws shall prevail.

3. OTHER POLICIES

Other than this Code of Conduct, HFC may adopt other policies from time to time, which also prescribe policies and/or procedures for certain circumstances. These include the following:

- (a) Whistle Blowing Policy;
- (b) Conflict of Interests and Interested Person Transaction Policy;
- (c) Anti-corruption and Anti-money Laundering Policy; and
- (d) Best Practices Guide (Dealings in Company's Securities).