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Code of Ethics and Conduct	Page 1

The Board has also formalised a Code of Ethics and Conduct which reflects the Group's vision and core values of integrity, respect and trust. The core areas concerned include the following:

- Compliance with Circulars, Guidelines and Policies
- Ensuring Information Confidentiality
- Ensuring Fair and Equitable Treatment
- Commitment to the Group, Quality and Competence
- Reporting Internal Fraud, Theft or Illegal Activities
- Conflict of Interest
- Misuse of Position and Information
- Fraudulent Records and transactions
- Unethical and Negligent Conduct

The Code of Ethics and Conduct governs the conduct of the Directors and all employees of the Group and provides guidance on the communication process and the duty to report whenever there are breaches of the same. In connection thereto, each Director is to communicate any suspected violations of this code to the Chairman of the Audit Committee and all violations will be investigated by the Board or by persons designated by the Board, and appropriate action will be taken in the event of the said violations. This code is reviewed and updated from time to time by the Board to ensure that it continues to remain relevant and appropriate.

Further details on the Code of Ethics and Conduct are set out in the Board Guidelines and can be viewed at Group's website at www.mtouche.com.