

# Redcats ASIA Code of Conduct

## Introduction

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The Company believes that honesty, integrity and fair play are important company assets in business. All staff have to ensure that the Company's reputation is not tarnished by dishonesty or corruption. This Code sets out the basic standard of conduct expected of all staff and the company policies on acceptance of advantages and declaration of conflict of interest by staff in connection with their official duties.

## Acceptance of Advantages

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1. It is the Company policy that staff should not solicit or accept any advantage (the definition of "advantage" is detailed at the **Annex 1** and includes money, gift, loan, fee, reward, employment, contract, service and favor) in connection with his work without the permission of the Company. However, staff are allowed to accept (but not solicit) the following gifts offered voluntarily:

- (a) Advertising or promotional gifts of a nominal value; or
- (b) Gifts given on festive or special occasions subject to a maximum limit of US\$15 in value

2. Staff should decline an offer of a gift if the acceptance could affect their objectivity in conducting the company's business, or induce them to act against the interest of the company, or lead to allegations of impropriety. If a staff member wishes to accept a gift not covered in paragraph 1, he / she should seek permission in writing (via Form A) from the Managing Director / Country Manager of the Office.

## Entertainment

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3. "Entertainment" refers to food or drink provided for immediate consumption on the occasion, and of any other entertainment provided at the same time. Although entertainment is an acceptable form of business and social behaviour, staff must not accept lavish or frequent entertainment from persons with whom the company has business dealings (e.g. suppliers or contractors) to avoid placing themselves in a position of obligation to the offerer. For more details of the definition of "Entertainment", please refer to **Annex 1**.

## Conflict of Interest

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4. A conflict of interest situation arises when the private interest of a staff member competes or conflicts with the interest of the company. Private interest includes both the financial and personal interests of the staff member and those of his connections. Connections include family members, relatives, and close personal friends.

5. Staff should avoid situations which may lead to an actual or perceived conflict of interest situation, and should make a declaration in writing (via Form B) to the Managing Director/Country Manager of the Office (details as shown in paragraph 2) when such a situation arises. Failure in doing so may give rise to criticism of favouritism, abuse of authority or even allegation of corruption.

6. Some common examples of conflict of interest include:

- (a) A staff member involved in the procurement process is closely related to or has beneficial interest in a company which is being considered by the Company in the selection of a supplier or service provider;
- (b) one of the candidates under consideration in a recruitment or promotion exercise is a family member, a relative or a close personal friend of the staff member responsible for the recruitment or promotion;
- (c) a staff member involved in the selection of a supplier for the Company engages in frequent or excessive gambling with one of the suppliers under consideration;
- (d) a term contractor whose contract is about to be renewed grants a personal loan to the staff member responsible for contract negotiation; or
- (e) a staff member responsible for evaluating tenders is a part-time consultant of one of the tenderers.

### **Handling of Confidential Information**

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7. All staff are prohibited from disclosing any information classified by the company to anybody without authorization. Those who have access to or in control of such information should at all times ensure its security and prevent any abuse or misuse of the information. Examples of misuse include disclosure of information in return for monetary rewards, or use of information for personal gains.

### **Compliance with the Code**

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8. It is the personal responsibility of every staff member to understand and comply with the Code and the related local laws. Managers should also ensure that their subordinates understand well and comply with the standards and requirements stated in the Code.

9. Any staff member who is in breach of the Code will be subject to disciplinary action, including termination of employment. In cases of suspected corruption / bribery or other criminal offences, a report will be made to the appropriate local authorities.

10. Any enquiries about the Code or reports of possible breaches of this Code should be channeled to Glenda WEE – SVP of Global Sourcing, Shanon MacBEATH - SVP of HR-Paris, Priscilla FONG – HR Director of Redcats Asia and respective Office Managers for advice and action.

11. Any enquiries about local anti-corruption laws, please contact the respective HR and Administration staff of each office for details.