

CODE OF CONDUCT



Opus Kinetic
People Empowerment



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CODE OF CONDUCT

Our Code of Business Conduct serves to guide the actions of our employees consistent with our Company values:

- Integrity & Honesty
 - We are honest & straightforward in all our professional & business relationships. This is our Core Value statement.
- Objectivity
 - We maintain strong professional judgments & do not allow any biasness, influence to override our professionalism.
- Professional competence
 - We ensure clients' needs are met with the right competence provided by our company. We adhere to strong professional competencies in managing every clients needs & expectations.
- Confidentiality
 - We respect confidentiality of information & do not misuse any information or disclose anything to external or 3rd parties.
- Professional behavior
 - We comply with international laws & regulations. We not only exercise our decisions based on the laws but what is right as well.
- Respect
 - We treat with respect all our employees, courtesy & fairness.

Our aim is that all of our operations are conducted in compliance with Opus Kinetic standards and applicable health and safety laws and regulations.



PRIVACY

We respect the privacy of our people and commit to acting responsibly when collecting, processing, retaining, disclosing and disposing of their personal information.

We aim to maintain the accuracy, confidentiality and security of this information and will only share it with authorized individuals and for legitimate business purposes and, where appropriate, with the permission and/or knowledge of the individual.



UPHOLDING HUMAN RIGHTS

Opus Kinetic respects and upholds international standards on human rights and does not engage in any conduct that hinders or interferes with them.

Our human rights commitment means that we will not engage, tolerate or work with business partners:

- That employ children and minors
- That engage in human trafficking or forced, bonded or compulsory labour

We respect the human rights of people in communities impacted by our activities, including in relation to their use of land, water and other natural resources.

We do not allow the use, possession, distribution, and/ or sale of illicit drugs during Opus Kinetic business hours, on our premises, at official sponsored events, or in any way that violates the law. Singapore prohibits the use of drugs and there are serious consequences for violating its laws.



HOW WE DO BUSINESS

HOW WE DO BUSINESS

OUR PRACTICES

Opus Kinetic is committed to conducting its business in an ethical manner and one in which our business practices align with our organizational values. Our success depends on ensuring that these practices are in alignment with this Code of Conduct and that how we do business is as important as the results we achieve.

CONFLICTS OF INTEREST

A conflict of interest is a situation in which competing interests may affect our ability to make unbiased and objective decisions on behalf of Opus Kinetic. This includes personal interests that conflict with our work-related responsibilities.

We are committed to avoiding conflicts of interest wherever possible, to managing conflicts of interest in a transparent and ethical way, and to putting the interests of Opus Kinetic before our own. Where potential conflicts of interest are identified, we manage them fairly and professionally.

We disclose any actual or potential conflicts of interest that may influence, or may be perceived as influencing, a business decision. We sign an annual declaration that all such conflicts have been disclosed. All disclosed conflicts are assessed and resolved in accordance with our Conflicts of Interest Policy.

PREVENTING BRIBERY & CORRUPTION

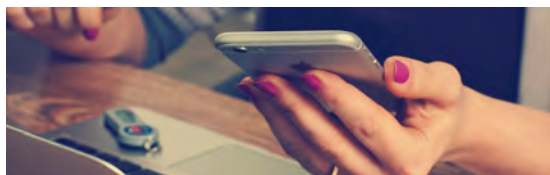
At Opus Kinetic, we have zero tolerance for any form of bribery or corruption. We work proactively to ensure that corruption does not occur anywhere within our operations and comply with all applicable anti-bribery and corruption laws and international conventions.

As part of this commitment, the direct or indirect offer, payment, solicitation or acceptance of bribes in any form is strictly prohibited. This includes the giving or receiving of an improper advantage through undue influence, preferential treatment or any form of illegal payment. We prohibit the making of payments to public officials. This likewise includes the making of facilitation payments.

A bribe can take the form of money, goods, services or anything else of value, including:

- Gifts and gift cards
- Hospitality
- Donations and sponsorships
- Kickbacks and/or commissions
- Travel or reimbursement of costs
- Employment opportunities and internships
- Education
- Any other favors intended to unduly influence a decision

We take additional care when doing business in countries known to have high levels of corruption and ensure that we know and trust our business partners, agents and intermediaries.



HOW WE DO BUSINESS

GIFTS AND ENTERTAINMENT

We do business with organizations and people from many cultures and recognize that building business relationships may sometimes involve the exchange of incidental gifts, hospitality and entertainment. We are committed to acting fairly and being seen to act fairly at all times. We only exchange hospitality and entertainment where there is a clear business reason to do so and when the costs involved are reasonable and appropriate for the circumstances.

Our procedures provide detailed guidelines on the giving and receiving of gifts and entertainment and recognize that some types of gifts and entertainment, such as cash, are never acceptable.

As a rule, we do not exchange gifts or entertainment, except for promotional items or hospitality whose value is below SGD 200.

CONFIDENTIAL INFORMATION

We always communicate in an honest and open manner and protect the confidential information entrusted to us.

We encourage collaboration and the sharing of information but reiterate the importance of handling confidential information appropriately.

All information received in conjunction with our role at Opus Kinetic should be treated as confidential and protected.

Confidential information should only be disclosed on a need to know basis, for legitimate purposes and only when duly authorized in accordance with our policies and procedures.

Information is one of our most important assets. All information relevant to Opus Kinetic's operations, including information received from third parties, should be protected at all times, no matter what form it appears in or how it was received.

Please adhere to the following principles when dealing with information:

- Limit disclosure inside the organization only to those with authorized access and on a need-to-know basis
- Never use Opus Kinetic information for personal benefit or profit
- Classify all information in accordance with Opus Kinetic's Information Classification Standard
- Do not use information in a way that could be detrimental to the welfare, interest or reputation of the organization
- Never remove confidential information from Opus Kinetic premises without prior approval
- Take all possible security measures when reviewing information electronically
- Never leave confidential information unattended or unlocked
- Seek authorization to copy confidential information
- Dispose of documents in an appropriate manner, in line with their confidentiality classification
- All information remains the property of Opus Kinetic and should be returned upon completion of employment or a contractual relationship

What we mean by confidential information:

All confidential information refers to non-public materials pertaining to Opus Kinetic's operations, directly or indirectly obtained, disclosed or provided to, by or on behalf of the organization, in any format and irrespective of the media in which it was contained, acquired or produced.

HOW WE DO BUSINESS

MONEY LAUNDERING

Money laundering supports criminal activity, including drug trafficking, terrorism, corruption and tax evasion. At Opus Kinetic, we are committed to ensuring that our operations do not inadvertently facilitate such activities.

We have adopted anti-money laundering measures and comply with all applicable anti-money laundering laws. We do business only with individuals and entities whose identities have been confirmed as legitimate business entities and only in accordance with properly executed contractual terms and commitments.

Our anti-money laundering procedures should be always followed and any suspicious activities reported to the legal team immediately.

Money laundering is the process of disguising the proceeds of crime in order to hide its illegal origins or otherwise dealing with the proceeds of crime.

More broadly, it is all acts contemplated under provisions of Law no. 4 of 2010 Promulgating the Law of Combating Money Laundering and Terrorism Financing.

Alerts as to possible money laundering activities may include but are not limited to:

- An unwillingness to disclose the source or use of funds
- Requests made to bypass or circumvent internal controls
- Requests for payment in cash instead of using wire transfers
- The use of shell or numbered companies with no registered or disclosed ownership
- Structured payment terms in which smaller remittances are requested

ENGAGING WITH BUSINESS PARTNERS

All business partners, agents and intermediaries must be made aware of our Code of Conduct and we should always ask to see a copy of their standards of business conduct.

In addition, we must also:

- Undertake due diligence to ensure that our potential partners are:
 - Reputable
 - Legitimate
 - Qualified to carry out the work we are engaging them to do
 - Not under relevant sanctions or regulatory actions
- Establish contractual obligations around ethical business conduct
- Ensure that everyone involved is aware of the basis of our decision making terms, conditions process
- Understand the terms of our contracts and upholds our standards in all Opus Kinetic related transactions





Opus Kinetic[®]
PEOPLE EMPOWERMENT

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