

BKI INVESTMENT COMPANY LIMITED (BKI)

CODE OF CONDUCT

This Code of Conduct sets ethical standards for officers, directors, employees, agents, and contractors of BKI Investment Company Limited (“**BKI**”), and any other party representing BKI (collectively, “**Representatives**”). Representatives will pursue the highest standards of ethical conduct in the interests of BKI shareholders and all other stakeholders.

The following six principles govern their conduct. Representatives:

Honesty and Integrity

- shall act honestly and with integrity in all of their dealings for the company.
- will not discriminate on the grounds of people’s race, religion, gender, marital status or disability.
- will at all times deal fairly and in good faith with BKI investors, suppliers, competitors, as well as with work colleagues and other parties.
- will ensure their conduct at all times is such that their honesty is beyond question.
- shall adhere to the truth, and not mislead directly or indirectly nor make false statements, nor mislead by omission.
- will protect BKI’s reputation and assets.

Personal Transactions

- personal or other business dealings will be kept separate from their dealings as a Representative of BKI.
- shall not use the name of BKI to further any personal or other business transaction.
- shall use goods, services and facilities provided to them by BKI, strictly in accordance with the terms on which they are provided.

Confidentiality of Information

- will ensure that confidential information relating to BKI investors, work colleagues, suppliers and BKI’s operations is properly protected and not disclosed to third parties, unless allowed or required under relevant law or regulation.
- will not use information obtained by them as a Representative of BKI for personal financial gain, nor will that information be used to obtain financial benefit for any other person or business.
- shall respect the privacy of others.



Disclosure of Interests

- shall fully disclose active private or other business interests promptly and any other matters which may lead to potential or actual conflicts of interest in accordance with such policies that the BKI Board may adopt from time to time.
- shall fully disclose all relationships they have with BKI in accordance with policies on independence that the BKI Board may adopt from time to time.
- will always deal with BKI at arm's length to avoid the possibility of actual or perceived conflicts of interest.

Payments, Gifts, Entertainment and Travel

- shall not use their status as a Representative of BKI to seek personal gain from those doing business or seeking to do business with BKI, or from any other person or company.
- shall not accept any personal gain of any material significance if offered.
- will not accept any personal cash payments from third parties when acting on behalf of BKI.

Abiding by the Law

- shall abide by the law at all times.
- will not knowingly take any action, nor allow any omission, that will breach any law or regulation (including insider trading laws) of the country in which I work.
- will comply with all statutory disclosure requirements.
- will immediately report, to an appropriate officer of BKI, knowledge of any actual or potential breaches of the law or this Code by BKI or a BKI representative.

I understand that if I breach any law or provision of this Code, the breach will be investigated, which could result in disciplinary action, including termination of my contractual relationship with BKI.

NAME: _____

SIGNED: _____

DATED: _____