

CODE OF CONDUCT AND ETHICS

EuroSports Global Limited (the “Company”) and its subsidiaries

A. Code of Conduct

EuroSports Global Limited and its subsidiaries (collectively, the “Group”) believes in responsible social and ethical behaviour and has the responsibility to the employees serving the Group worldwide. Furthermore, the Group and its employees have an obligation to all stakeholders to observe high standards of integrity and fair dealing. This is the foundation for and the reason why the Group have created the Code of Conduct and Ethics

Who does the Code of Conduct and Ethics apply to?

The Code of Conduct and Ethics applies to all our employees in the Group and all our business partners. Suppliers will be included via contractual provisions.

Seeking guidance and whistleblowing

If an employee is concerned about someone or something, or wishes to make a complaint or report a violation, the Outsourced Head of Internal Audit should be informed. The form provided in “Annex 1 - Report on Non-Compliance” can be used. An employee’s information will be treated confidentially, and no employee will be discriminated against for reporting, in good faith, violations of the Code of Conduct.

Employee Privacy

Company e-mail and internet functions should be used only for the Group’s purposes and therefore all traffic is the Group’s property. The Group reserves the right to monitor e-mail and internet use.

Employment and medical records are kept confidential and are only disclosed for legitimate reasons. Employment records will not be released to any person unless required by law or with the written consent of the employee concerned.

Alcohol and/or Drug Abuse

The Group expects all employees to attend work with their judgment unimpaired and therefore to refrain from any alcohol and/or other drug abuse that may affect their work.

Community Outreach

The Group acts as a good corporate citizen wherever it operates and supports local, regional and global communities in appropriate ways.

B. Business Ethics

The Group respects the laws and regulations related to business ethics in the countries in which it operates and requires that its employees, suppliers and partners do the same.

Competition and Anti-trust Legislation

The Group does not engage in unfair, misleading or inaccurate comparisons, anti-competitive agreements or arrangements. Employees must avoid any kind of anti-competitive agreements or concerted practices, tacit or otherwise, with any of the Group's competitors or business partners.

Bribery

The Group does not accept bribes, facilitation payments or extortion in any form, be it as a giver/initiator or as a receiver.

Gifts, gratuities and donations

Purchasing and sales activities shall be handled with utmost integrity. Therefore neither the Group nor its employees should give or accept any gifts or gratuities offers that could influence the employee's or the customer's decision making. Small gifts, hospitalities and expenses are very common and natural in business relationships. With careful consideration and at a moderate value, this could be acceptable, except whenever such arrangements could improperly affect the outcome of business transactions. To avoid any misconduct in this area, all gifts, hospitalities and expenses above S\$300 must be reported to the Human Resource Manager for further guidance.

Fraud

The Group does not accept fraud in any form.

Records and Reports

The integrity of the Group's record-keeping and reporting systems, including electronic reports and systems, is of utmost importance. Employees must take special care to make sure that records are accurately and completely prepared and reviewed, whether they are for internal or external use.

Conflict of interest

Conflict of interest between the employee and the Group must be avoided. Should such conflict occur, the employee must inform the immediate manager. Conflict of interests includes:

- Outside business activities
- Personal financial interest
- Using insider or otherwise confidential information for personal gain
- Employment of family members or close personal friends
- Buying from or selling to family members or close personal friends

C. Environment, Health and Safety

Environment and sustainability

The Group continuously seeks ways to reduce the consumption of resources, prevent pollution and improve the overall environmental impact of its operations and products along the value chain. The Group also encourages the development and diffusion of environmentally friendly technologies. All employees are expected to support and take responsibility for the Group's environmental performance.

Work Environment

The Group is committed to providing a safe working environment and reducing risks that can cause accidents or impair the health and well-being of its employees. This includes for example that chemicals are marked and handled in a safe way, work areas are kept clean and free from pollution and that instructions regarding the use of personal protection and work equipment are adhered to. Workshop facilities should provide adequate and clean changing rooms, washrooms and toilets, separate for men and women.

Building and fire safety

The Group has a Workplace, Health and Fire Safety Manager who will lead in this area. Hazardous material and equipment should be stored according to applicable rules and policy. There should be clearly marked emergency exits. Exits must not be blocked and should be well lit. All employees shall be briefed on information about the safety arrangements such as emergency exits, fire extinguishers, first aid equipment, etc. The fire alarm should be tested and evacuation drills carried out on a regular basis.

First aid and Medical Care

First aid equipment must be available at appropriate locations, and at least one person in each location should be trained in basic first aid. Medical aids should be contacted if necessary in the event of an accident on the premises. The Group should cover the costs of medical care for injuries incurred on its premises if they are not covered by insurance provided safety rules have not been violated.

D. Confidentiality

In carrying out the Group's business, employees, managers and directors often learn confidential or proprietary information about the Group, its customers, suppliers, or joint venture parties. Employees, managers and directors must maintain the confidentiality of all information so entrusted to them, except when disclosure is authorized or legally mandated. Confidential or proprietary information of our Group, and of other companies, includes any non-public information that would be harmful to the relevant company or useful or helpful to competitors if disclosed.

E. Protection and Proper Use of Company Assets

All employees, managers and directors should protect the Company's assets and ensure their efficient use. All Company assets should be used only for legitimate business purposes.

F. Dealing in Securities

All directors and employees should not deal in the Company's securities for one month before the announcement of the half yearly and full year results and ending on the date of the announcement of the relevant results. Reminders will be sent by email to remind all directors and employees.

At all times, all directors and employees should observe the insider trading laws when dealing in securities within the permitted trading periods.

All directors and employees are advised not to deal in the Company's securities for a short term considerations (shareholdings for a period of less than 3 months).

