

ALPINA HOLDINGS LIMITED CODE OF CONDUCT

INTRODUCTION

Alpina Group emphasizes the importance of understanding and adhering to the rules of conduct. This Code sets out principles for employees and directors to follow, ensuring the highest standards of personal and corporate integrity in dealings with competitors, customers, suppliers, employees, and the community.

Conflict of Interest

Employees must avoid situations where personal interests conflict with the Company's interests, including any ownership or interest in a business competing with the Company. Prompt disclosure is required.

Proprietary Information & Intellectual Property

Employees must keep company information, trade secrets, and sensitive business details confidential. All intellectual property arising through the course of work belongs to Alpina Group. Employees should not infringe on third-party rights and must disclose any inventions related to the company's business.

Ethical Conduct and Compliance with Laws

Alpina Group conducts business ethically and complies with all laws and regulations. Integrity must guide all relationships, both internal and external.

Company Property and Assets

All company properties, including photocopiers, personal computers, laptops, etc., must be handled with care and properly maintained. Employees should refrain from using these properties for personal purposes. Additionally, those managing company funds and expenses must do so responsibly, ensuring transactions are legitimate, well-documented, and provide suitable value to the company in return.

Use of IT Systems

When updating personal data or uploading information (documents, videos, photos, etc.) in the Group's IT systems, employees must act responsibly. This includes refraining from knowingly updating false information and avoiding the uploading of materials that are defamatory, offensive, obscene, inappropriate, or that violate laws or the rights of others, including intellectual property and confidentiality obligations.

Disciplinary Action

Alpina Group places great emphasis on good discipline at the workplace. Contravention may result in the administration of disciplinary actions, which includes verbal warnings, written warnings, suspension of service and termination of service or dismissal.

Review

The Human Resources division, in collaboration with Group Finance, Group Legal, and Group Internal Audit, regularly reviews the Code. This ensures business integrity, protection of the Group's interests, and a harmonious work environment.