

The Company's directors, managers, and employees follow the Code of Business Conduct and Ethics that is set in NIC ASIA Capital's policy. The goal of the Company's Code of Business Conduct and Ethics is to prevent misconduct and to encourage, among other things, honest and ethical conduct, as well as to guarantee that the Company's business is conducted in a consistently lawful and ethical way.

NIC ASIA Capital is committed to:

- Passion for Excellence—We strive for excellence in all we do.
- Integrity – We interact in an open, honest positive manner and is guided by what is right.
- Teamwork – We work together with trust, transparency, honesty, and mutual respect.
- People – We strive to create a culture in which employees are driven, engaged, appreciated, and encouraged to grow. NIC ASIA Capital is defined by its people, who make a difference.

### **Our Responsibilities to Our Stakeholders**

- To NIC ASIA Capital

Integrity is the foundation of who we are as people and by extension, Integrity serves as the foundation of NIC ASIA Capital.

- To Each Other

We owe one another honesty, respect, and fairness. We value each employee's individual contributions.

- To Our Business Partners, Clients, and End-User Customers

Our clients, business associates, and end users have confidence in the caliber and worth of our service offerings. To continue to have possibilities to expand our business, we rely on having solid connections with both our clients and business partners.

- To Our Shareholders

Our investors have faith in us to manage all of our resources wisely in order to expand our company.

- To Our Community

When we give back to the community, we instill pride in our employees and gain the respect of the citizens in our community.

In NIC ASIA, we have an Action-Decision making model to help its employees make appropriate decisions when tackling ethical problems.

1. Act Responsibly

- Have you accepted accountability for your part of the issue? It's OK to admit to errors.
- Do you have all of the information you require?
- Has the information been made clearer?

2. Consider Our Core Values

- Does the behavior display integrity?
- Does it foster collaboration?
- Does it demonstrate respect for our People?
- Does it demonstrate Excellence?

3. Obey the Rules

Does the activity in question comply with?

- The law
- Company's Policy
- Requirements of Regulatory Agencies

The boundaries of the laws, rules, and regulations that are relevant to our operation are followed by NIC ASIA Capital. The democratic process, civil society, and conducting business in a competitive global market all depend on the rule of law. The market of today, however, requires that businesses adhere to higher standards; merely following the law is insufficient. NIC ASIA Capital makes business decisions that are in line with our country's law and our core values of respect to our employees, passion for excellence, honesty, and collaboration.