



ETHICS POLICY

Version 0.2

1. Overview

Amigo Holdings Ltd and its subsidiaries (hereafter collectively referred to as “Amigo” or “the Company”) are committed to protecting employees, partners, vendors and the company from illegal or damaging actions by individuals, either knowingly or unknowingly. When the Company addresses issues proactively and uses correct judgment, it will help set us apart from competitors.

Amigo will not tolerate any wrongdoing or impropriety at any time and will take the appropriate measures to act quickly in correcting the issue if the ethical code is broken.

2. Purpose

The purpose of this policy is to establish a culture of openness, trust and to emphasise the employee’s and consumer’s expectation to be treated to fair business practices. This policy will serve to guide business behavior to ensure ethical conduct. Effective ethics is a team effort involving the participation and support of every Company employee. All employees should familiarise themselves with the ethics guidelines that follow this introduction.

3. Scope

This policy applies to employees, contractors, consultants, temporaries, and other workers at Amigo, including all personnel affiliated with third parties.

4. Policy

4.1 Executive Commitment to Ethics

- 4.1.1 Senior leaders within Amigo must set a prime example. In any business practice, honesty and integrity must be top priority for the senior management.
- 4.1.2 The senior management must have an open door policy and welcome suggestions and concerns from employees. This will allow employees to feel comfortable discussing any issues and will alert management to concerns within the work force.
- 4.1.3 Management must disclose any conflict of interests regarding their position within Amigo.

4.2 Employee Commitment to Ethics

- 4.2.1 Amigo employees will treat everyone fairly, have mutual respect, promote a team environment and avoid the intent and appearance of unethical or compromising practices.
- 4.2.2 Every employee needs to apply effort and intelligence in maintaining ethics value.
- 4.2.3 Employees must disclose any conflict of interests regard their position within Amigo.
- 4.2.4 Employees will help Amigo to increase customer and vendor satisfaction by providing quality products and timely response to inquiries.
- 4.2.5 Employees should consider the following questions to themselves when any behavior is questionable:
 - Is the behavior legal?
 - Does the behavior comply with all appropriate Amigo policies?
 - Does the behavior reflect Amigo values and culture?
 - Could the behavior adversely affect company stakeholders?

- Would you feel personally concerned if the behavior appeared in a news headline?
- Could the behavior adversely affect Amigo if all employees did it?

4.3 Company Awareness

- 4.3.1 Promotion of ethical conduct within interpersonal communications of employees will be rewarded.
- 4.3.2 Amigo will promote a trustworthy and honest atmosphere to reinforce the vision of ethics within the company.

4.4 Maintaining Ethical Practices

- 4.4.1 Amigo will reinforce the importance of the integrity message and the tone will start at the top. Every employee, manager, director needs consistently maintain an ethical stance and support ethical behavior.
- 4.4.2 Employees at Amigo should encourage open dialogue, get honest feedback and treat everyone fairly, with honesty and objectivity.
- 4.4.3 Amigo's Board has establishes best practice and monitors operations to make sure an ethical service is delivered to all employees and that concerns regarding processes can be addressed.
- 4.4.4 Employees are required to recertify their compliance to Ethics Policy as and when it is deemed necessary by the Board or in the event of an update to the Company's business practices.

4.5 Unethical Behavior

- 4.5.1 Amigo will avoid the intent and appearance of unethical or compromising practice in relationships, actions and communications.
- 4.5.2 Amigo will not tolerate harassment or discrimination.
- 4.5.3 Unauthorised use of company trade secrets & marketing, operational, personnel, financial, source code, & technical information integral to the success of our company will not be tolerated.
- 4.5.4 Amigo will not permit impropriety at any time and we will act ethically and responsibly in accordance with English law.
- 4.5.5 Amigo employees will not use corporate assets or business relationships for personal use or gain.

5. Policy Compliance

5.1 Compliance Measurement

The Human Resources Department will verify compliance to this policy through various methods, including but not limited to, internal and external audits, and feedback.

5.2 Non-Compliance

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.