

CODE OF CONDUCT

(For Directors, Management and Employees)

Alpha Insurance Company Limited (ALPHA) is committed to the highest level of integrity in the conduct of its business. The Company believes that compliance with the highest standards of ethical conduct is critical to maintain trust and credibility amongst directors, with customers, agents, and employees, and is key to the Company's long-term survival and success.

This document outlines the principles of ethical conduct, and details the Company policy in various related areas.

Every employee is expected to conduct in line with this Code of Conduct without exception. Managers in particular should lead by setting an example for other employees. Beyond legal compliance, all employees are expected to observe high standards of business and personal ethics in the performance of their assigned duties and responsibilities. This requires the practice of honesty and integrity in every aspect of dealing with other insurers, customers, the public, the business community, shareholders, and governmental and regulatory authorities.

Employees of ALPHA, shall

Abidance of Laws / Rules

- Conform to and abide by the ALPHA's rules and obey all lawful orders and directives which may from time to time be given by any person or persons under whose jurisdiction, superintendence or controls they may, for the time being, be placed. They shall comply with and observe all applicable laws, regulations and ALPHA's policies.

Integrity

- Conduct themselves with the highest standards of ethics, professional integrity and dignity in all dealings with the public, clients, and other employees and not engage in acts discreditable to ALPHA and profession of General Insurance. If they become aware of any irregularity that might affect the interests of ALPHA, they shall inform the senior management immediately.
- Maintain all books, data, information and records with scrupulous integrity, reporting in an accurate and timely manner all transactions / reports.
- Avoid all such circumstance in which there is personal interest conflict, or may appear to be in conflict, with the interests of ALPHA or its customers. Not use their employment status to seek personal gain from those doing business or seeking to do business with ALPHA and nor accept such gain if offered.

Confidentiality

- Maintain the privacy and confidentiality of all the information acquired during the course of employment and refrain from disclosing the same unless otherwise required by statutory authorities/law. All such information will remain as a trust and will only be used for the purpose for which it is intended and will not be used for the personal benefits of any individual(s). Inside information about ALPHA's customers/affairs shall not be used for their own gain or for that of others either directly or indirectly.

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BUSINESS / WORK ETHICS

- Respect fellow colleagues and workers as a team. They shall at all times be courteous and not let any personal differences affect their work. They will treat every proposer / policyholder of ALPHA with respect and courtesy.
- Ensure good attendance and punctuality and demonstrate consistently good record in this regard. For any absence during working hours shall obtain written permission of immediate supervisor. They shall not absent from their duties without having the permission of the competent authority.
- Maintain a standard of personal hygiene and dress appropriately for attendance at work. Their appearance must inspire confidence and convey a sense of professionalism.
- As personal responsibility, safeguard both the tangible and intangible assets of ALPHA and its customer(s) that are under their personal control and shall not use ALPHA assets for their personal benefits except where permitted by ALPHA.
- Not indulge in any kind of harassment including sexual harassment or intimidation whether committed by or against any senior/junior, co-worker, customer or visitor. They shall not use language, written or spoken, in communication with any individual neither inside nor outside the office that may contain any statement or material that is offensive to others. They shall never use ALPHA's system to transmit or receive electronic image or text containing ethnic slurs, social epithets or anything that might be construed as harassing, offensive or insulting to others.
- To meet their responsibilities to fellow employees, and customers they shall help in maintaining a healthy and productive work environment and shall not engage in the selling, manufacturing, distributing, using, any illegal substance or being under the influence of illegal drugs while on the job.
- Ensure strict adherence to all health and safety policies as may be implemented from time to time.

FAIR BUSINESS PRACTICES

The success of ALPHA depends on our ability to outperform our competitors; however, the Company is committed to achieving success using fair, honest and ethical means.

In order to continue to maintain ALPHA's reputation for fair dealing among our customers, partners, competitors and the public, all employees should adhere to the following principles:

- **Fairness to customers** – All customers and partners should be treated equally and fairly. Any complain of customer should be resolved on the basis of equality, fairness and interest of the Company.

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- **Honesty and truthfulness** – Information or material facts about the Company, its technology, products, quality, timetables and other business-related issues should never be misrepresented with intent to deceive.
- **Unfair competition** – Employees should never make defamatory or false statements regarding other companies. Employees should never misappropriate trade secrets or confidential information of a competitor.

PROHIBITION OF CORRUPT PRACTICES

ALPHA and its employees should not demand or accept, offer or give any kind of bribery, kickback, payoffs or any other illegal or unethical benefits, and should never be involved in any corrupt business practices. No one will involve/support any political activity in any capacity on behalf of ALPHA.

USE AND PROTECTION OF COMPANY ASSETS

ALPHA has a wide variety of assets, including physical assets, proprietary information and intellectual property. ALPHA's assets should be used only for lawful and proper Company purposes.

- **Physical assets** - Equipment, materials and other physical assets should be handled and cared for properly, and should be used only for ALPHA's business purpose. They should not be used for personal benefit, sold, loaned, given away or otherwise disposed of, regardless of their condition or value, without proper authorization.
- **Confidential or Proprietary Information** – ALPHA recognizes the importance of Intellectual Property rights and other proprietary or confidential information to any Company. ALPHA and its employees shall take every appropriate action to preserve and enhance its Intellectual Property, while respecting the Intellectual Property rights of others. ALPHA employees should never access or use confidential or proprietary information for any purpose other than as required for the performance of their duties, and should never disclose such information, either during or after employment, without the Company's authorization to do so. This policy covers also confidential or proprietary information of any Company with which ALPHA has signed a contract or has business relationship.
- **ALPHA's IT and Communication Systems** – ALPHA's IT and communication systems, including personal computers, laptops and connections to the Internet, shall be used for conducting ALPHA's business only. Employees should not use ALPHA's communication systems for sending, retrieving, accessing, displaying, storing, printing or otherwise disseminating material and information that is fraudulent, harassing, threatening, illegal, racial, sexually oriented, obscene, intimidating, defamatory or otherwise inconsistent with a professional and ethical conduct.