

Nobel Design Holdings Ltd Anti-Corruption, Gifts and Entertainment Policy

Purpose and Scope

Nobel Design Holdings Ltd (the “**Company**”) adopts a zero-tolerance attitude towards bribery and corruption. The Company would rather forgo business opportunities than to engage in acts of bribery and corruption, and fully supports its employees in this regard.

The Company’s Anti-Corruption, Gifts and Entertainment Policy (the “**Policy**”) serves to ensure compliance with the relevant anti-corruption legislation in Singapore and overseas. The Policy extends to all of the Company’s business dealings in all countries in which it operates.

Policy

For the purpose of this Policy the terms "bribery" and "corruption" refer to the offer or receipt of an advantage, whether in cash or in kind, with a corrupt intent. Bribery and Corruption can be committed regardless of whether the offer or receipt of such advantage is by the Company or through an intermediary appointed by the Company, and regardless of whether the act of bribery or corruption has in fact been completed.

The Company has established detailed procedures and monetary thresholds to govern the approval and declaration of meals, gifts, entertainment, travel and accommodation, charitable contributions and sponsorships, as listed in the Company’s Code of Conduct.

Further, all employees must neither give nor receive any gift or entertainment that is disproportionate to what would usually constitute an acceptable gift in a particular occasion, even if the monetary thresholds are complied with. Where feasible, employees should also avoid accepting cash or cash-equivalent gifts. Similarly, care should always be taken to ensure that the provision and receipt of any charitable contributions and sponsorships do not create reputational risk, or the potential for real or perceived conflicts of interest.

The Chief Operating Officer and senior management are responsible for ensuring that the Company and its employees comply with all relevant anti-corruption regulations. Each employee of the Company is personally responsible for compliance, and for ensuring that his actions do not cause the Company to breach any relevant anti-corruption legislation.

Governance

The Board provides oversight for the Policy. The Audit Committee will review the Policy, as appropriate, to ensure the effectiveness of the Policy. The Audit Committee will discuss any revision that may be required, and recommend any such revision to the Board for consideration and approval.

The Chief Operating Officer of the Company has been appointed as the compliance officer for the Group in respect of this Policy.

Communication of Policy

The Policy shall be communicated to the Company’s stakeholders, including but not limited to its directors, employees, shareholders, suppliers, business partners and customers. The Policy shall be published on the Company website, which is accessible by the public.

Reporting of Violation of Anti-Corruption Policy

Any employee, officer or director who believes that a violation of this Policy has occurred should promptly report such alleged violation to a supervisor or the Chief Operating Officer. Such reports may be made anonymously. Confidentiality will be maintained, subject to applicable laws and regulations.