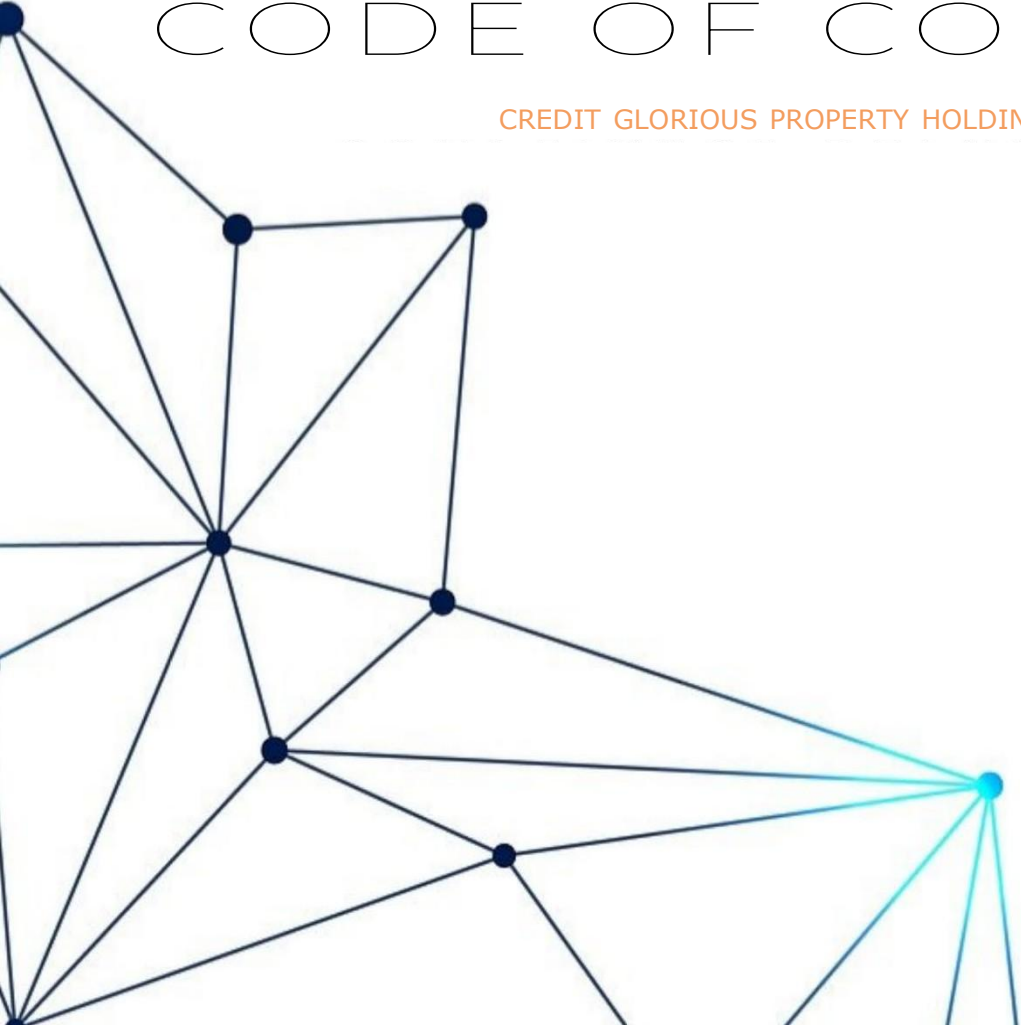


CODE OF CONDUCT

CREDIT GLORIOUS PROPERTY HOLDINGS LTD.



CODE OF CONDUCT

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Introduction

This Code of Conduct (hereinafter referred to as the "Code") establishes the rules of behavior aimed at ensuring necessary transparency and fairness between Glorious Property Holding Group (hereinafter referred to as the "Group") and individuals who come into contact with it. The Group abides by the Code in all its activities, both in Italy and abroad. The Code is binding and does not claim to be exhaustive in nature. It serves as a guide for ethical conduct within the Group, outlining the expected standards for interactions with various stakeholders. Transparency and integrity are core values upheld by the Group, and this Code reflects its commitment to these principles. It provides a framework for responsible and ethical practices, promoting trust and accountability. The Code is readily accessible to anyone and can be consulted in electronic format on the Group's website. Alternatively, individuals can request a hard copy by contacting the Management. The Group encourages all stakeholders to familiarize themselves with the Code and to adhere to its provisions. By maintaining an effective Code of Conduct, the Group strives to foster a culture of ethical behavior and promote a positive reputation both within and outside the organization.

We understand that our success is intricately tied to your satisfaction and the confidence you place in us. Therefore, we recognize the unique privilege and responsibility of being your trusted financial partner. As such, we have developed this comprehensive Code of Conduct to ensure that our relationship is built on a foundation of trust, professionalism, and transparency. Our commitment to providing you with the highest level of service is unwavering. We strive to exceed your expectations by delivering financial solutions tailored to your unique needs and goals. Our dedicated team of professionals is equipped with the knowledge, expertise, and resources to guide you through every step of your financial journey. Integrity is the bedrock upon which our Code of Conduct is built. We hold ourselves to the highest ethical standards, conducting our business with honesty, transparency, and fairness. You can trust that we will always act in your best interests, placing the integrity of our advice and actions above all else. Respect is at the heart of our interactions with you. We value your perspectives, concerns, and aspirations. Our commitment to mutual respect means that we will actively listen to your needs, treat you with courtesy, and foster an inclusive and welcoming environment.

This Code of Conduct serves as a guiding framework for our interactions with you. It outlines the principles that govern our behavior and decision-making processes. By adhering to this Code, we ensure consistency and reliability in our service delivery. We are committed to open and transparent communication. We will provide you with clear and accurate information about our products, services, fees, and any associated risks. We will communicate in a timely manner, ensuring that you are well-informed and empowered to make sound financial decisions. Your privacy and the security

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of your information are of paramount importance to us. We maintain strict safeguards to protect your personal and financial data, adhering to industry best practices and applicable regulations. You can trust that your information will be handled with the utmost confidentiality and used only for legitimate purposes. In the event that you have any concerns, questions, or feedback, we encourage you to reach out to our dedicated client service team. We are here to listen, address your concerns, and provide timely and satisfactory resolutions.

We view our relationship with you as a partnership. We are committed to your long-term financial success and will continuously strive to enhance our services and offerings to meet your evolving needs. Your satisfaction and trust are the cornerstones of our success.

Thank you for choosing Glorious Property Holdings Group as your financial partner. We look forward to serving you and building a lasting relationship based on trust, integrity, and mutual respect.

Section 1 Professionalism and Integrity

1.1 Professionalism. We consider professionalism and integrity to be the cornerstones of our relationship with you. We understand that trust is earned through consistent and ethical behavior, and we are fully committed to upholding these principles in all our interactions with you. Our team of professionals is carefully selected for their expertise, experience, and dedication to providing exceptional service. We undergo rigorous training and adhere to strict ethical guidelines to ensure that every member of our team consistently upholds the highest standards of professionalism. When you engage with us, you can expect to be treated with the utmost respect and courtesy. We value your time, opinions, and concerns, and we actively listen to ensure that we fully understand your unique needs and goals. Our commitment to fairness means that we strive to provide you with balanced and unbiased advice, taking into consideration your specific circumstances.

1.2 Honesty and open communication. Honesty is a fundamental aspect of our approach. We believe in transparent and open communication, ensuring that you have access to all the relevant information necessary to make informed decisions. We will clearly explain the benefits, risks, and costs associated with our products and services, ensuring that you have a comprehensive understanding. Furthermore, we are committed to acting in your best interests. Our team operates under a fiduciary duty, meaning that we place your interests ahead of our own. We will work diligently to ensure that the recommendations and solutions we provide are aligned with your financial objectives and risk tolerance.

1.3 Integrity. Integrity is the guiding force behind our actions. We adhere to a strict code of ethics that prohibits any behavior that may compromise your trust in us. We maintain the highest level of confidentiality and privacy when handling your personal and financial information, ensuring that it is protected at all times. In the event that we make a mistake or fall short of your expectations, we take full responsibility and will work swiftly to rectify the situation. Our commitment to fairness means that we will address any concerns or complaints you may have in a transparent and timely manner. We value your feedback and see it as an opportunity to continuously improve our services. By placing professionalism and integrity at the forefront of our interactions, we aim to build a relationship with you based on trust, reliability, and long-term mutual success. We understand that your financial well-being is of utmost importance, and we are dedicated to providing you with the highest level of service and support.

1.4 Sensitive Data. We understand the importance of safeguarding your personal and financial information. We recognize that you entrust us with sensitive data, and we take this responsibility seriously. Rest assured that we have implemented robust security measures to protect your information from unauthorized access, loss, or misuse. Our commitment to data privacy is unwavering. We adhere to industry best practices and comply with all relevant laws and regulations governing data protection.

1.5 Systems and processes. Our systems and processes are designed with the utmost care to ensure the confidentiality and integrity of your information. We regularly review and update our security measures to stay ahead of emerging threats and technological advancements. We maintain strict access controls, limiting access to your information to authorized personnel who require it for legitimate business purposes. Our employees undergo thorough training on data protection and are bound by strict confidentiality agreements. We continuously monitor our systems and networks for any suspicious activities and have incident response plans in place to address any potential breaches swiftly and effectively. In addition to protecting your information, we are committed to being transparent about how we handle your data.

1.6 Clear Information. We will provide you with clear and concise information about our privacy practices, including how we collect, use, store, and disclose your personal information. We will obtain your consent for any specific uses of your data and will only share it with third parties when necessary and in accordance with applicable laws and regulations. Our dedication to data privacy extends beyond compliance. We are committed to earning and maintaining your trust by demonstrating our commitment to protecting your information.

We welcome any questions or concerns you may have about the security of your data and are always available to provide you with the information and reassurance you need.

1.7Transparency. Transparency is at the heart of our relationship with you. We believe that open and honest communication is essential to building trust and ensuring that you have the information you need to make informed decisions. We are committed to providing you with accurate, comprehensive, and timely information about our products and services. When you engage with us, we will clearly explain the features, benefits, terms, and conditions of our offerings. We want to ensure that you have a complete understanding of what you can expect from our products and how they can meet your specific needs and goals. We will never use confusing jargon or complex financial language. Instead, we will communicate in a clear and understandable manner, ensuring that you have the information you need to make sound financial decisions.

1.8Full Disclosure. We are committed to full disclosure. If there are any risks associated with our products or services, we will make sure you are aware of them. We want you to have a comprehensive understanding of the potential outcomes and any factors that may impact your financial well-being. Our goal is to empower you with the knowledge and information you need to make confident choices. Transparency also extends to our fees and charges. We will provide you with clear and transparent information about the costs associated with our products and services. We will disclose any fees, commissions, or other charges upfront, ensuring that you have a complete picture of the financial implications. By upholding professionalism, integrity, and transparency, we aim to build a solid foundation of trust and confidence in our relationship with you. We want you to feel secure and informed every step of the way. Your financial well-being and satisfaction are our top priorities, and we are dedicated to providing you with the highest level of service and support.

Section 2

Clear and Transparent Communication

2.1Effective Communication. Effective communication is the foundation of our relationship with you. We recognize that clear and understandable communication is essential for building trust and ensuring that you have a complete understanding of the information we provide. We are committed to communicating with you in a manner that is free from unnecessary jargon or complex financial language that may hinder your comprehension.

2.2Transparent Communication. Our goal is to facilitate open and transparent communication, allowing you to make well-informed decisions about our products and services. Whether we are discussing investment options, financial planning strategies, or addressing any other aspect of our offerings, we will ensure that the information is presented in a clear, concise, and accessible manner. We want you to feel empowered and confident in your financial choices, and we believe that effective communication is key to achieving this.

2.3Comprehensive Information. We are dedicated to providing you with relevant and comprehensive information about our products and services. When discussing our offerings, we will ensure that you have a thorough understanding of their features, benefits, terms, and conditions. We want to equip you with the knowledge necessary to evaluate the suitability of our products and services for your unique financial needs and goals.

2.4Additional Information. In addition to explaining the key aspects of our offerings, we will also provide you with any additional information that may be relevant to your decision-making process. This may include market trends, regulatory updates, or any other information that can help you make informed choices. We believe that by arming you with comprehensive information, you can have greater confidence in your financial decisions.

2.5Client' satisfaction. Your satisfaction is of paramount importance to us. We are committed to addressing any questions, concerns, or complaints you may have in a timely and efficient manner. Our dedicated team is ready to listen to your feedback and take the necessary steps to provide satisfactory resolutions. We understand that your time is valuable, and we aim to respond promptly to any inquiries or requests for assistance. Our goal is to ensure that you feel heard, supported, and valued as our client.

2.6Inquiries. We will handle your inquiries with the utmost care and attention, working diligently to provide you with the information or resolution you seek. Should any issues arise, we will work with you to find a mutually beneficial solution that aligns with your best interests. We believe that effective and responsive communication is essential for building and maintaining a strong relationship with you. We are committed to being there for you every step of the way, providing the support and information you need to make informed financial decisions.

Your satisfaction is our priority, and we will continuously strive to exceed your expectations through clear, timely, and transparent communication.

Suitability and Financial Advice

3.1Client's Financial Needs. Your financial well-being is the driving force behind our services. We understand that each client is unique, with their own financial needs, goals, and risk tolerance. That is why we are dedicated to assessing your individual circumstances to recommend products and services that are specifically tailored to your requirements.

3.2Client's Financial Situation. Our team of experienced professionals will work closely with you to gain a comprehensive understanding of your financial situation. By considering factors such as your income, expenses, financial goals, and time horizon, we strive to develop personalized solutions that align with your aspirations. We are committed to ensuring that the recommendations we provide are suitable for you, taking into account your current situation and your vision for the future.

3.3Unbiased Guidance. Our financial advice is founded on accuracy, objectivity, and your best interests. We understand that financial decisions can have significant implications for your future, and we take this responsibility seriously. Our team of knowledgeable professionals will provide you with unbiased guidance, taking into account both the opportunities and risks associated with various financial products and strategies.

3.4Informed Decisions. We believe in equipping you with the information necessary to make informed decisions. Through clear explanations and comprehensive analysis, we will ensure that you have a thorough understanding of the potential outcomes of different financial options. Our goal is to empower you to navigate the complexities of the financial landscape confidently.

3.5Conflicts of Interests. In our commitment to transparency, we will openly disclose any conflicts of interest that may arise in the provision of our services. We recognize that conflicts can exist, and we believe it is essential to address them openly and honestly. If any conflicts arise, we will take appropriate measures to manage and mitigate them, always placing your best interests first.

3.6Our Priority. Our priority is to act as your trusted financial advisor, providing recommendations that are solely focused on helping you achieve your financial objectives. We are committed to maintaining the highest standards of professionalism and integrity throughout our relationship with you. By being transparent about any conflicts of interest and ensuring that our advice is unbiased, we aim to cultivate a relationship built on trust and mutual respect.

3.7Our Approach. Through our personalized and transparent approach, we strive to empower you to make well-informed decisions about your financial future. Your satisfaction and financial well-being are at the forefront of everything we do. By upholding the highest standards of professionalism, integrity, and transparency, we aim to be your trusted partner on your financial journey.

Protection of Assets and Privacy

4.1Security Systems. We recognize that the assets you entrust to us are of great importance. We take the responsibility of safeguarding your assets seriously and have implemented robust security measures to ensure their protection. Our commitment to asset protection extends across all aspects of our operations, including physical security, technology systems, and procedural controls. We employ state-of-the-art security systems and continuously monitor and update our infrastructure to stay ahead of potential threats. Our dedicated team of security professionals works tirelessly to maintain the highest level of security standards.

4.2Industry Best Practices. We follow industry best practices and comply with relevant regulations to mitigate the risk of unauthorized access, loss, or misuse of your assets. Our comprehensive approach to asset protection encompasses multiple layers of security. From secure data centers to encrypted communication channels, we prioritize the confidentiality and integrity of your assets. We regularly assess and enhance our security measures to address emerging risks and stay proactive in safeguarding your assets.

4.3Privacy. We understand and respect the importance of your privacy. Your trust is paramount to us, and we are committed to protecting the confidentiality of your personal information. We adhere to applicable data protection laws and regulations, ensuring that your privacy rights are upheld. When you provide us with personal information, we handle it with the utmost care and only use it for legitimate purposes as outlined in our privacy policy.

4.4Procedures. We maintain strict procedures and controls to safeguard your personal information from unauthorized access, alteration, or disclosure. Our staff undergoes comprehensive training on data privacy and protection, ensuring that your information is handled securely and in compliance with the highest standards. We also employ secure technologies and industry-recognized encryption methods to protect your data during transmission and storage. Our commitment to privacy extends to the careful selection of third-party vendors and partners who adhere to the same stringent privacy standards.

4.5Personal and Financial Information. Your personal and financial information is treated with the utmost confidentiality. We will not disclose your information to third parties without your explicit consent, except when required by law or as part of our contractual obligations to provide you with the requested products or services. We understand the sensitivity of the information you entrust to us, and we have implemented strict protocols and controls to ensure its confidentiality. Our commitment to confidentiality extends throughout our organization, and all employees are bound by strict confidentiality agreements. We regularly review our processes and procedures to ensure compliance with privacy laws and regulations. You can have confidence that your personal and financial information remains secure within our organization, and we are committed to maintaining the trust you have placed in us. Through our unwavering commitment to asset protection and privacy, we aim to provide you with the peace of mind you deserve.

Your trust and confidence in our ability to safeguard your assets and protect your privacy are fundamental to our relationship with you.

Complaints and Dispute Resolution

5.1Concerns and/or Complaints. Your satisfaction is our top priority, and we welcome your feedback as an opportunity for continuous improvement. We understand that concerns or complaints may arise, and we are committed to addressing them promptly and effectively. Our dedicated team is here to listen to your concerns and work diligently to resolve them. When you bring a complaint or concern to our attention, we will initiate a comprehensive investigation.

5.2Fair and Impartial Assessment. We will gather all relevant information and conduct a fair and impartial assessment of the situation. Throughout the process, we will keep you informed about the progress and steps being taken to address your concerns. Our goal is to ensure that your complaint is handled with the utmost care and attention. We recognize the importance of transparency in resolving complaints, and we will provide you with clear and understandable explanations of our findings and proposed solutions. We are committed to reaching a fair and satisfactory outcome that addresses your concerns and upholds our commitment to service excellence.

5.3 Complaint Escalation or Dispute Resolution. If, for any reason, you are not satisfied with the outcome of our internal complaint resolution process, we are dedicated to providing you with information on external avenues for complaint escalation or dispute resolution. We believe in providing you with access to impartial channels that can provide an additional level of review and resolution.

5.4Further Resolutions. We will guide you through the available options and provide you with the necessary information to pursue further resolution. This may include referring you to relevant regulatory bodies, industry ombudsman services, or alternative dispute resolution mechanisms. We are committed to ensuring that you have access to fair and independent processes for resolving any unresolved issues. Our commitment to protecting your assets, respecting your privacy, and providing a fair and transparent complaints and dispute resolution process reflects our unwavering dedication to maintaining a strong and trusted relationship with you. Your feedback and satisfaction are invaluable to us, and we will continue to uphold the highest standards of professionalism, integrity, and client service in all our interactions.

Sanctioning System

6.1Potential Risks. The internal control system is designed to implement tools and methodologies aimed at mitigating potential risks within the company. Its primary objective is to ensure compliance not only with legal requirements but also with internal provisions and procedures. It is crucial to uphold these principles as they serve to maintain a solid foundation of trust between the Group and its administrators, employees, consultants, collaborators, clients, and suppliers. Any violation of the established Code principles or internal control procedures poses a threat to this trust, and as a result, the Group will promptly and firmly address such violations. Appropriate and proportionate disciplinary measures will be implemented to address any misconduct.

6.2Illegal Activities. In the event that the Group has reasonable grounds to suspect, based on its own documentation or the behavior of its employees, both internal and external collaborators, partners, or Clients, that they may be involved in or implicated in any illegal activities, the Group retains the right to immediately terminate the contract and take appropriate action to safeguard its interests and reputation. This may include informing the relevant Judicial Authority about the suspected misconduct. The Group recognizes the importance of swift action in order to protect its own integrity and maintain a strong ethical foundation.

6.3Information and Documents. Should the Group discover that information or documents provided by a client are false or do not accurately represent the truth, the Group retains the right to terminate the contract with the party responsible for providing such misleading information. In addition to termination, the Group may withhold any sums received from the Client as a means to cover the costs incurred during the engagement and as compensation for any damages suffered. Regardless, the Group reserves the right to take any necessary actions it deems fit to pursue further compensation for any additional damages resulting from violations of this Code and national regulations. The Group remains committed to upholding its standards and protecting its interests, taking all necessary measures to rectify any breaches and mitigate the consequences of non-compliance.

Conclusions

By embracing and adhering to the principles outlined in this comprehensive Code of Conduct, we are making a solemn commitment to you, our esteemed client. We understand the significance of our role as your trusted financial partner and acknowledge the responsibility that comes with it. Our dedication to upholding the highest standards of professionalism means that you can expect nothing less than the utmost integrity and competence from our team. We recognize that our success is intricately linked to the trust you place in us, and we are unwavering in our commitment to earning and maintaining that trust.

Integrity is at the core of everything we do. We pledge to act with honesty, transparency, and accountability in all our interactions with you. Whether we are providing financial advice, handling your sensitive personal information, or executing transactions on your behalf, we will always prioritize your best interests. We understand the importance of transparency and pledge to communicate with you in a clear, concise, and timely manner. We are committed to ensuring that you have access to relevant and comprehensive information about our products, services, fees, and associated treated with the utmost confidentiality and used only for legitimate purposes. We will not disclose your information to third parties without your explicit consent, except when required by law or as part of our contractual obligations. In the event that you encounter any concerns or have questions, our dedicated team is here to assist you. We value open and honest communication and are committed to promptly addressing any issues that may arise. Our goal is to provide satisfactory resolutions in a timely and fair manner, ensuring your peace of mind and satisfaction.

By choosing this Group as your financial partner, you have placed your trust in us, and we are truly grateful for that. We consider it an honor and a privilege to serve you. Should you require any further clarification or have any questions, please do not hesitate to reach out to our dedicated team.

We are here to guide and support you every step of the way. Once again, thank you for entrusting us with your financial needs. We look forward to building a strong and enduring relationship based on mutual respect, trust, and shared success. Furthermore, we are deeply committed to safeguarding your assets and respecting your privacy. We employ robust security measures to protect your assets from unauthorized access or loss. Your personal and financial information will berisks. We will go the extra mile to ensure that you are fully informed, enabling you to make well-informed decisions that align with your financial goals.

Client Name and Surname

Client Signature:

Date: