





CODE OF ETHICS

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Introduction

Purpose of the Code of Ethics

The purpose of the Code of Ethics is to provide clear guidance and expectations for the ethical conduct of all employees within the organization. This Code outlines the principles, standards, and values that guide our actions and decisions. It serves as a reference for employees to ensure that their behavior aligns with the highest ethical standards and reflects the company's commitment to integrity, transparency, and responsible business practices. By adhering to these principles of corporate responsibility, the Glorious Property Holdings Groupd (the "Group") aims to build trust, promote ethical conduct, and create sustainable value for all stakeholders and clients. We recognize that responsible business practices are integral to our long-term success and the positive impact we can have on the communities we serve. By embracing these values, the Group aims to create a positive and ethical corporate culture that guides our behaviors, decisions, and relationships. We believe that by adhering to these principles, we can achieve long-term success while making a positive impact on the financial industry and the communities we serve.

Statement of Intent

We are dedicated to conducting our business in an ethical and socially responsible manner. Our intent is to build trust and maintain the confidence of stakeholders, including clients, employees, shareholders, and the communities in which we operate. This Code of Ethics sets forth our commitment to upholding ethical conduct, complying with laws and regulations, and promoting a positive corporate culture that values integrity, fairness, and accountability.

Company Values

Our company values serve as the foundation for our ethical framework and are deeply embedded in our organizational culture. These values guide our behavior and interactions, both internally and externally. They shape the way we conduct business and define our relationships with clients, employees, suppliers, and the broader community. Our core values include:

- Integrity: We uphold the highest standards of honesty, fairness, and ethical conduct in all aspects of our business. We are committed to acting in the best interests of our stakeholders and maintaining the trust placed in us.
- Excellence: We strive for excellence in everything we do. We are dedicated to delivering exceptional services, demonstrating professionalism, and continuously improving our practices to exceed expectations.
- Collaboration: We value collaboration and teamwork. We foster an inclusive and supportive work environment that encourages the sharing of ideas, knowledge, and expertise for the collective success of the company and its stakeholders.
- Accountability: We take responsibility for our actions and decisions.
 We honor our commitments and are transparent in our communications. We accept the consequences of our choices and learn from them to drive continuous improvement.
- Respect: We treat everyone with respect, dignity, and fairness, regardless of their background or role. We embrace diversity and promote inclusivity, valuing the contributions and perspectives of each individual.

Section 1 Corporate Responsibility

1.1Transparency and integrity. We uphold the highest standards of transparency and integrity in all our business dealings. We believe in fostering an environment of openness, where information is readily accessible to our stakeholders. We are committed to providing clear and accurate communication, ensuring that all relevant information is shared in a timely manner. Our employees are expected to act honestly, ethically, and with integrity, both internally and externally.

1.2Legality and Compliance. Compliance with laws and regulations is of utmost importance to us. We are dedicated to conducting our operations in full compliance with applicable legal requirements at all levels, including local, national, and international laws. Our employees are expected to be knowledgeable about the laws and regulations relevant to their roles and responsibilities and to adhere to them diligently. Any potential legal or regulatory issues should be promptly reported to the appropriate channels within the company.

1.3Protection of Stakeholder Interests. We value the trust and confidence that our stakeholders, including customers, employees, investors, and the community, place in us. We are committed to protecting their interests and ensuring their well- being. We strive to deliver high- quality products and services, maintaining a customer-centric approach in all our interactions. We promote fair and equitable treatment

of our employees, providing a safe and inclusive work environment that fosters personal growth and professional development. Furthermore, we aim to be a responsible corporate citizen, actively engaging with and contributing to the communities in which we operate.

1.4Conflict of Interest Management. We recognize that conflicts of interest may arise in various business situations. Our employees are expected to identify and disclose any actual or potential conflicts of interest that could compromise the best interests of the company or its stakeholders. We have established clear guidelines and procedures to manage such conflicts, ensuring that appropriate steps are taken to mitigate their impact. Our employees are required to act in the best interests of the company and its stakeholders, avoiding any actions that could compromise their judgment or objectivity.

1.5Accurate and Timely Financial Reporting. We are committed to maintaining the highest standards of financial reporting accuracy and transparency. Accurate and timely financial reporting is essential for ensuring the reliability of our financial statements and providing stakeholders with a clear understanding of our financial performance. Our employees involved in financial reporting processes must adhere to the applicable accounting standards, guidelines, and internal controls. They are responsible for the accuracy, completeness, and timeliness of financial information, and are encouraged to promptly report any concerns or irregularities they may observe.

Section 2 Business Ethic

2.1Professional Conduct and Personal Ethics. We place great emphasis on professional conduct and personal ethics. Our employees are expected to uphold the highest standards of professionalism in their interactions with colleagues, clients, and the public. We value honesty, integrity, and accountability in all aspects of our business. Each employee is responsible for demonstrating ethical behavior, maintaining a strong moral compass, and acting in a manner that reflects positively on the company.

2.2Respectful and Inclusive Treatment. We believe in fostering a diverse and inclusive workplace that values and respects the contributions of every individual. Discrimination, harassment, or any form of unfair treatment based on factors such as race, gender, religion, age, disability, or sexual orientation will not be tolerated. We promote a culture of mutual respect and equal opportunity, where all employees are treated with dignity and provided with a safe and inclusive environment to thrive and grow.

2.3Confidentiality and Information Protection. The protection of sensitive information is crucial to maintaining the trust of our stakeholders. We are committed to safeguarding confidential and proprietary information, including that of our customers, employees, and business partners. Our employees are required to maintain strict confidentiality and adhere to data protection regulations. They must exercise caution and discretion when handling and sharing information, ensuring its confidentiality, integrity, and proper use.

2.4 Responsible Use of Company Resources. We consider our company resources, including financial, technological, and physical assets, as valuable and finite. Therefore, we expect our employees to use these resources responsibly and efficiently, solely for business purposes. Unauthorized or excessive use of company resources for personal gain or non-business-related activities is strictly prohibited. We encourage employees to report any misuse or wastage of company resources to appropriate channels within the organization.

2.5Relationships with Customers. Building strong and trusted relationships with our customers is at the core of our business. We are committed to providing exceptional service, delivering value, and meeting the needs of our customers with integrity and professionalism. Our employees are expected to act in the best interests of our customers, maintaining honesty, transparency, and fair dealing. We strive to understand and address their requirements, deliver accurate information, and provide prompt and efficient support.

2.6Relationships with Suppliers and Business Partners. We recognize the importance of cultivating mutually beneficial relationships with our suppliers and business partners. We engage in fair and transparent procurement practices, selecting suppliers based on objective criteria such as quality, reliability, and competitiveness. We conduct business with integrity, honoring our contractual obligations and treating our suppliers and business partners fairly and respectfully. We aim to build long-term, collaborative



relationships that create value for both parties.

Section 3

Legal and Regulatory Compliance

3.1Compliance with Laws and Regulations. We are committed to upholding the highest standards of legal and regulatory compliance. We strive to ensure that our business operations, practices, and policies are in full adherence to the laws and regulations governing our industry and the jurisdictions in which we operate. Our employees are expected to have a solid understanding of the applicable laws and regulations relevant to their roles and responsibilities and to comply with them diligently. We regularly monitor and assess changes in the legal and regulatory landscape to promotify adapt our practices as required

3.2Fraud, Corruption, and Money Laundering Prevention. We have a zerotolerance policy towards fraud, corruption, and money laundering. We are dedicated to preventing these illicit activities within our organization and the broader financial system. Our employees are expected to be vigilant and report any suspicious activities or attempts at fraud or corruption. We have implemented robust internal controls, including anti-fraud and anticorruption measures, to detect and prevent such activities. We conduct thorough due diligence on our clients, partners, and suppliers to ensure that we engage in business relationships with reputable and trustworthy entities. 3.3Information Security and Data Protection. The security and protection of information are paramount for us. We are committed to maintaining the confidentiality, integrity, and availability of sensitive data, both of our clients and our organization. We implement comprehensive information security policies, procedures, and technologies to safeguard data from unauthorized access, disclosure, alteration, or destruction. Our employees undergo regular training to raise awareness about information security best practices and their role in maintaining data privacy. We comply with applicable data protection regulations and take measures to handle and process personal data lawfully and securely.

3.4Compliance. We recognize that compliance with laws, regulations, and ethical standards is not only a legal requirement but also a fundamental aspect of maintaining trust and credibility with our stakeholders. By ensuring strict adherence to legal and regulatory requirements, as well as implementing robust measures for fraud prevention and information security, we aim to protect the interests of our clients, maintain the integrity of our operations, and contribute to the stability and transparency of the financial industry as a whole.

Social and Environmental Responsibility

4.1Sustainability and Environmental Management. The Group is committed to practicing sustainability and environmental responsibility in all aspects of our operations. We recognize the importance of minimizing our environmental footprint and promoting sustainable practices to protect the planet for future generations. We strive to reduce waste, conserve resources, and minimize our energy consumption. We continuously assess and implement environmentally friendly initiatives and technologies to promote sustainable development. By integrating sustainability into our business strategies, we aim to contribute to a greener and more sustainable future.

4.2Community Involvement. We believe in actively engaging with and contributing to the communities in which we operate. We encourage our employees to participate in community service and volunteer activities, supporting initiatives that promote social welfare, education, and economic development. We establish partnerships with local organizations and nonprofit entities to address community needs and contribute to social progress. Through our community involvement efforts, we aim to make a positive impact and build stronger, more inclusive communities.

4.3Diversity and Inclusion. We value and embrace diversity in all its forms. We believe that a diverse and inclusive workforce leads to enhanced creativity, innovation, and better decision-making. We are committed to providing equal opportunities for employment and advancement, regardless of race, gender, ethnicity, age, disability, sexual orientation, or any other characteristic protected by applicable laws. We foster a culture that values and respects diverse perspectives, experiences, and backgrounds. We actively promote diversity and inclusion through recruitment, talent development programs, and creating an inclusive work environment where every individual feels valued, heard, and empowered.

4.4Health and Safety at Work. The health and safety of our employees are of utmost importance to us. We strive to provide a safe and healthy work environment, free from hazards and risks. We maintain rigorous health and safety policies and procedures, ensuring compliance with applicable laws and regulations. We provide regular training and awareness programs to promote a safety-conscious culture and empower our employees to identify and mitigate workplace hazards. We encourage open communication regarding health and safety concerns and promptly address any issues to ensure and guarantee the well-being of our employees.

4.5Enviromental Responsibility. By integrating social and environmental responsibility into our business practices, the Group aims to make a positive impact on society and contribute to sustainable development. We recognize that our actions can influence and inspire others, and we strive to be a responsible corporate citizen that leads by example in promoting sustainability, supporting our communities, fostering diversity and inclusion, and prioritizing the health and safety of our employees.

Enforcement and Compliance

5.1Role of the Ethics Committee. We have established an Ethics Committee to oversee the enforcement and compliance of our Code of Ethics. The Ethics Committee comprises individuals from various departments and levels within the organization, representing a diverse range of perspectives. The committee is responsible for monitoring and evaluating the implementation of ethical standards, providing guidance on ethical matters, and ensuring the consistent application of the Code of Ethics across the company. The committee plays a vital role in promoting a culture of integrity, ethics, and accountability within our organization.

5.2Violation Reporting Procedures. We encourage all employees to report any suspected or actual violations of our Code of Ethics promptly. We have implemented a confidential and anonymous reporting system that enables employees to raise concerns without fear of retaliation. Reports can be made through designated reporting channels, such as a dedicated ethics hotline or an online reporting platform. We take all reports seriously and ensure that appropriate measures are taken to address the reported violations. We guarantee the confidentiality of those reporting violations to the extent permitted by law and protect them against any form of retaliation

5.3Investigations and Disciplinary Sanctions. Upon receiving a report of a potential violation, the Group will initiate a thorough and objective investigation. The investigation will be conducted by qualified individuals who are independent of the reported violation. The investigation process will include gathering evidence, interviewing relevant parties, and assessing the credibility and severity of the reported violation. Once the investigation is complete, appropriate disciplinary actions will be taken if a violation is substantiated. Disciplinary sanctions may include verbal or written warnings, suspension, termination of employment, or legal action, depending on the severity and nature of the violation.

5.4Records. We are committed to ensuring a fair and transparent process throughout the investigation and disciplinary actions. Any employee found to have made false or malicious reports with the intention of causing harm to others will be subject to appropriate disciplinary measures as well. We maintain records of all reported violations, investigations, and subsequent actions taken to demonstrate our commitment to upholding ethical standards and compliance.

5.5Clear Reporting Procedures. By establishing clear reporting procedures, conducting impartial investigations, and implementing appropriate disciplinary sanctions, the Group aims to foster a culture of accountability and ensure compliance with our Code of Ethics. We believe that consistent enforcement and fair treatment are essential for maintaining trust, promoting ethical behavior, and upholding the integrity of our organization.

Conclusions

Company Commitment

We are fully committed to upholding the principles and values outlined in this Code of Ethics. We recognize that ethical conduct and responsible business practices are fundamental to our success and reputation. We commit to continuously promoting a culture of integrity, transparency, and accountability throughout our organization. By adhering to this Code, we aim to build trust with our stakeholders, foster a positive work environment, and contribute to the sustainable growth of our company.

Code Acceptance and Adherence Signature

We require all employees, from the highest levels of management to the newest recruits, to read, understand, and comply with this Code of Ethics. By signing below, each employee acknowledges their responsibility to uphold the ethical standards and obligations outlined herein. This signature signifies their commitment to acting with integrity, adhering to the principles and values set forth in the Code, and



3. Resources for Further Questions or Clarifications

We understand that ethical dilemmas or questions may arise in the course of our work. To assist employees in making informed decisions and seeking guidance, we have established resources for further questions or clarifications. Employees are encouraged to reach out to their immediate supervisors, the Human Resources department, or the Ethics Committee for guidance on ethical matters. Additionally, we have provided contact information for the Ethics Hotline, an anonymous reporting mechanism, where employees can report concerns or seek advice on ethical issues confidentially. We are committed to providing the necessary support and guidance to ensure employees have the resources they need to navigate ethical challenges effectively.

Contact Information:

-Supervisor/Manager:

Integrating them into their daily work activities. It is throughcollective adherence to this Code that we can maintain our commitment to ethical

-Human Resources Department: conduct and uphold the values that define our organization.

-Ethics Committee:

Employee Name and Surname:

-Ethics Hotline: Employee Signature:

Date

By providing accessible resources for questions and concerns, such as dedicated helplines, online platforms, and designated points of contact, we aim to foster a culture of open communication and continuous learning within our organization. We understand the importance of creating an environment where employees feel empowered to seek guidance and clarification on ethical matters

We strongly believe that ongoing dialogue is essential in upholding the highest standards of integrity and ethical conduct. By promoting open discussions and encouraging employees to voice their concerns or seek guidance, we can address ethical challenges effectively and proactively. This approach allows us to cultivate an atmosphere of trust and transparency, where ethical considerations are consistently prioritized.

Clarity and transparency regarding ethical matters are paramount to our commitment to maintaining a strong ethical framework. We strive to ensure that our policies, procedures, and expectations are clearly communicated to all employees. This includes providing comprehensive training programs and accessible resources that promote awareness and

understanding of our ethical standards.

We also recognize the importance of regularly reviewing and updating our ethical guidelines to align with evolving best practices and emerging ethical challenges. This commitment to continuous improvement demonstrates our dedication to upholding the highest level of integrity and ethical behavior.

Our goal is to create a workplace where every individual feels supported and empowered to make ethical decisions. By fostering open communication, providing accessible resources, and promoting ongoing dialogue, we reinforce our commitment to ethical conduct and maintain a culture of integrity throughout our organization.

The Code of Ethics of the Glorious Property Holdings Group serves as a comprehensive and guiding framework that shapes our actions, decisions, and behaviors. It embodies our unwavering commitment to conducting business responsibly, treating all stakeholders and clients with the utmost respect, and upholding the principles of transparency, integrity, and compliance.

By adhering to this Code, we demonstrate our dedication to ethical conduct in every aspect of our operations. It sets the foundation for our interactions with clients, colleagues, partners, and the communities we serve. We recognize that our success is not solely measured by financial achievements, but also by the ethical manner in which we conduct our business.

Through the principles outlined in this Code, we strive to create an environment that fosters trust, fairness, and accountability.

We are committed to promoting a culture of ethics and integrity that permeates throughout our organization, from the executive level to every individual employee. It is through our collective efforts that we can build a sustainable and successful future for the Group. This Code of Ethics reinforces our dedication to transparency, ensuring that all our actions and decisions are conducted in an open and accountable manner. We value the trust that our stakeholders place in us and aim to maintain and strengthen these relationships through ethical business practices.

Furthermore, we are committed to upholding the highest standards of integrity and compliance with applicable laws, regulations, and industry best practices. We recognize that our success is built upon a foundation of ethical behavior, and we hold ourselves accountable to these principles.

In conclusion, by embracing this Code of Ethics, we commit ourselves to promoting ethical conduct, fostering a culture of integrity, and ensuring the long-term success and sustainability of the Group. Together, we can create a business environment that not only achieves our goals but also upholds the values and principles that define us as an organization.