

AIG CODE OF ETHICS AND BUSINESS CONDUCT

Aspire International Group

Our commitment to ethical behavior and the solid ethical foundations are one of the most essential components of ASPIRE INTERNATIONAL GROUP operation. We are committed to doing business the right way, based on a culture of ethics and compliance.

In the long term, we can successfully face the challenges of a competitive market environment by accepting the imperatives of moral responsibility, both as individuals and as a company. In performing the job duties, our aim is always acting lawfully, ethically and in the best interests of ASPIRE INTERNATIONAL GROUP.

Thank you for upholding our values and helping us do things right. It does not only mean that we provide well made, fairly priced and of exceptional quality products and services, but it also means that ethics and integrity is always born in mind.

1. Introduction

This CODE OF ETHICS AND BUSINESS CONDUCT of ASPIRE INTERNATIONAL GROUP serves as our ethical commitment and as a guide to proper business conduct for all of our stakeholders. We, at ASPIRE INTERNATIONAL GROUP, are committed to doing business legally, ethically and in a transparent manner.

This document applies to all staff who work for the ASPIRE INTERNATIONAL GROUP (including officers, directors, managers, team leaders, employees, temporary, agency, interim, sub-contractor or consultant staff), and also includes other organizations who do business with us.

The success of our business is based on the trust we earn from our employees, customers and shareholders. We gain credibility by adhering to our commitment to fairness and reaching our goals solely through ethical conduct.

All staff are expected to adhere to this Code in their professional, as well as personal conduct, treat everyone with respect, honesty and fairness.

Non-compliance to this Code is considered as misconduct that could warrant disciplinary action, including termination of employment or other contract in deserving cases.

We are committed to making efforts to apply our values and norms also throughout the entire value chain of our own suppliers, sub-contractors, service providers and business partners.

2. Ethical Principles/Values

Our core values at ASPIRE INTERNATIONAL GROUP include honesty, integrity, trustworthiness, respect for others, responsibility, accountability, reliability, and obedience to the law.

3. Compliance with laws and regulations

Our commitment to integrity begins with complying with laws, rules and regulations.

We are committed to adhere to every valid and binding contractual agreement that we conclude, and we do not abuse our rights.

4. Sustainability: People + Profit + Planet

We are committed to meet current requirements without compromising the needs of future generations and to this, we combine economic, environmental and social factors in our operation and our business decisions.

5. Human rights

We are committed to respect human dignity and rights of each individual and community whom we interact with during the course of work.

We shall not, in any way, cause or contribute to the violation of human rights.

Our staff shall treat everybody with dignity, respect and care and uphold human rights.

6. Fair labor practices and working conditions

We are committed to promote equality in our employment practices and to fair employment and remuneration policy in compliance with applicable laws.

We are firmly opposed to employing or contracting child or slave labor or any form of forced or compulsory or bonded labor.

Our staff shall act with integrity and treat their colleagues and others through the work with full respect.

7. Discrimination and harassment

We provide equal opportunity in employment and we do not tolerate any discrimination or harassment or any type of abuse.

All staff are expected to follow the highest standards of conduct in all verbal and written communication based on mutual respect, and must refrain from any form of harassment, slander or any behavior that could be taken as offensive, intimidating, humiliating, malicious or insulting.

8. Health, Safety and Environment

We provide clean, safe and healthy work conditions and we are dedicated to maintaining a healthy environment and we are committed to minimize the impact on the natural environment of our operations.

9. Fair competition and business conduct

Our relationships with business partners are built upon trust and mutual benefits compliant with competition law.

We are dedicated to ethical and fair competition, as we sell products and services based on their quality, functionality and competitive pricing.

We refrain from damaging competition and the reputation of any business partners and any behavior that harms competitor's credibility.

Customers and business partners shall be treated fairly and equally, products and services shall be displayed in a manner that is fair and accurate (fair marketing and advertising), and that discloses all relevant information.

10. Anti-corruption

We firmly condemn and do not tolerate all forms of corruption.

It is prohibited directly or indirectly offering, promising, giving, asking, soliciting or accepting any unfair advantage or benefit, in order to obtain, retain or facilitate in any way the business.

Corruption for either to obtain or retain business, or to obtain or retain an advantage in the conduct of business is considered gross misconduct.

Our staff has to account for all benefits received in the course of doing business and must not give or receive bribes or otherwise act corruptly.

11. Gifts and Hospitality

We shall avoid any actions that create a perception that favorable treatment was sought, received or given in exchange for personal benefits.

We may accept and offer occasional gifts and hospitality that are customary and conform to reasonable ethical practices of the market, provided that they are not inappropriately excessive, not frequent and do not reflect a pattern of frequent acceptance, does not create the appearance of an attempt to influence business decisions.

Only trivial gifts with low value can be accepted. All other gifts must be politely refused or, if received through post, returned to the donor. It is the responsibility of the person offering, providing, receiving or accepting the gift to decide whether the gift is appropriate.

12. Security, protection and proper use of company assets

We are responsible for the security, protection and for the economic use of company resources and our resources, including time, material, equipment and information are provided for legitimate business use only.

13. Confidentiality, information security, proprietary information and intellectual property

We are committed to business information confidentiality, integrity and accessibility, we implement proper technical security measures and it is our staff's obligation to uphold this.

We respect the property rights of others. We will not acquire or seek to acquire trade secrets or other proprietary or confidential information by improper means. We will not engage in unauthorized use, copying, distribution or alteration of software or other protected intellectual property.

14. Bookkeeping, true reporting and financial integrity

Our books, records, accounts and financial statements must be maintained in appropriate detail, and must truly and properly reflect our transactions.

We condemn all forms of money laundering, so we are committed to do business with partners involved in legitimate business activities with funds derived from legitimate sources.

We commit ourselves to fair taxation and to avoid all tax evasion practices, including such as failing to issue receipts or accounting fake expense invoices.

15. Anti-Fraud

Fraud – the act or intent to cheat, steal, deceive or lie – is both unethical and, in most cases, criminal.

Fraud in every form, (including e.g. submitting false expense reports; forging or altering financial documents or certifications; misappropriation of assets or misusing company property; making any untrue financial or non-financial entry on records or statements) is prohibited.

16. Conflict of Interests

Our decisions shall be based on objective and fair assessments avoiding the possibility of any improper influence.

A "conflict of interest" exists when an employee's personal interest (that can be linked to e.g. friends, family, or customer, competitor, supplier, contractor entity, as well) interferes or potentially interferes with the best interests of ASPIRE INTERNATIONAL GROUP.

Determining whether a conflict of interest exists is not always easy to do, thus anyone with a conflict of interest question should seek advice from management.

Conflicts of interest could arise:

- Being employed (you or a close family member) by, or being in economic relation with an actual or potential customer, competitor, supplier or contractor.
- Hiring or supervising family members or closely related persons.
- Serving as a board member for another company or organization.
- Owning or having a substantial interest in a customer, competitor, supplier or contractor.
- Having a personal interest, financial interest or potential personal gain in any company transaction.

If co-workers become involved in personal relations with each other, the onus is on the senior employee concerned to bring this to the attention of his or her manager to confirm that there is no conflict of interest, nor will a conflict of interest arise.

17. Privacy, personal data protection

We respect people's privacy and we acknowledge customers, employees and other natural persons' need to feel confident that their personal data is processed appropriately and for a legitimate business purpose.

We are committed to comply with all personal data protection laws. We only acquire and keep personal information that is necessary and we give proper information on these activities to data owners.

We implement proper security measures to assure confidentiality, integrity and availability of personal information.

Our staff must observe the legal requirements, apply compliant practices and follow related procedures to ensure legality of personal data handling and processing activities.