



CODE OF BUSINESS CONDUCT & ETHICS

Effective Date: 8 June 2023

Note: The current version of the Code of Business Conduct & Ethics is extracted from and forms part of the 88Spaces Employee Handbook. This document shall be updated periodically.

INTRODUCTION

a. Purpose

Our Code of Business Conduct & Ethics ("the Code") establishes the standards of integrity, business practices, and service excellence that support our values. 88Spaces is known for its commitment to service excellence and reliability. Central to this reputation is how we conduct business. Excellence with integrity and adherence to our values are crucial to 88Spaces' continued success in all interactions with customers, shareholders, and business partners.

All 88Spaces Team Members must comply with the Code. It is essential for all Team Members to understand and adhere to these standards.

b. Unacceptable Behaviors

Examples of behaviors that are unacceptable and may result in misconduct or termination of employment include:

- Theft, inappropriate removal, or possession of Company property.
- Unauthorized disclosure of business secrets or confidential information.
- Negligence or improper conduct leading to damage of Company or customer property.
- Boisterous or disruptive activity in the workplace.
- Fighting or threatening violence in the workplace.
- Violations of safety or health rules.
- Sexual, unlawful, or unwelcome harassment.
- Possession, distribution, sale, transfer, or use of alcohol or illegal drugs in the workplace.
- Excessive absenteeism, unpunctuality, or absence without notice.
- Smoking in the workplace.

c. Seeking Help and Information

This Code is not a comprehensive rulebook. If you have concerns or doubts about whether an action aligns with the Company's ethical standards, seek guidance. Contact the Ethical Business Liaison Officer for assistance.

d. Reporting Concerns and Violations

88Spaces encourages openness and will support any Team Member who raises genuine concerns in good faith. Report suspicious activity or wrongdoing to your immediate supervisor or the Human Resources Department. Whistleblowing channels are also available for reporting.

e. Anti-Retaliation

88Spaces strictly prohibits retaliation against Team Members who, in good faith, report violations of Company policies or laws. Employees may seek redress through governmental agencies if they believe they have been retaliated against for lawful reporting. Malicious or unfounded accusations will be subject to internal review and appropriate disciplinary action.

CONFLICT OF INTEREST

a. Declaration

Team Members must declare any financial or commercial interests—direct or indirect—that they or their immediate family members may have in dealings with 88Spaces. All declarations must be made in writing to the Chief Executive Officer.

b. Second Jobs/Outside Activities

Team Members must prioritize 88Spaces' business goals during work hours. Activities that create conflicts of interest or interfere with job responsibilities are prohibited.

ANTI-BRIBERY AND CORRUPTION

a. Introduction

88Spaces is committed to conducting business with honesty, integrity, and professionalism. Bribery and corruption are incompatible with 88Spaces' values, unlawful, and strictly prohibited.

b. Purpose

This policy aims to:

- Outline 88Spaces' expectations regarding bribery and corruption.
- Provide guidance to Team Members on recognizing and addressing related issues.

c. Definitions

- **Bribery:** Giving, offering, or accepting any advantage, financial or otherwise, to influence actions improperly.
- **Corruption:** Misuse of public or private office or power for personal gain.

d. Gifts and Hospitality

Team Members must not solicit or accept gifts or hospitality that imply an expectation of favors. Gifts or hospitality exceeding USD 300 must be reported to the Human Resources Department. If in doubt, seek guidance from the Chief Finance Officer.

e. Team Member Responsibility

All Team Members must comply with anti-bribery laws and this policy. Violations may result in summary dismissal and legal reporting. 88Spaces reserves the right to terminate relationships with third parties who breach this policy.

NON-DISCLOSURE AND CONFIDENTIALITY

The protection of confidential business information and trade secrets is vital to 88Spaces' success. Examples of confidential information include:

- Client information and databases.
- Financial data and marketing strategies.
- Proprietary processes and pending projects.

All Team Members must sign a non-disclosure agreement as a condition of employment. Improper use or disclosure of confidential information may result in disciplinary action, including termination.

EMPLOYMENT PRACTICES

a. Non-Discrimination

88Spaces provides equal employment opportunities based on merit, qualifications, and abilities. Discrimination based on race, color, religion, gender, sexuality, national origin, age, or disability is prohibited. Concerns should be raised with managers or the Human Resources Department without fear of reprisal.

b. Equal Opportunity

88Spaces' policy ensures fair treatment of all employees, free from discrimination and harassment. This applies to recruitment, development, and compensation decisions. Harassment or discrimination by anyone within the Company—including managers, co-workers, or clients—is not tolerated.

c. Anti-Harassment

Harassment, including sexual harassment, is against Company policy and will not be tolerated in any setting. Examples of prohibited behaviors include:

- Offensive remarks or jokes based on personal characteristics.
- Retaliation against individuals who file complaints or participate in investigations.
- Interfering with or refusing to cooperate in investigations.

This Code reflects 88Spaces' commitment to maintaining a professional, respectful, and ethical workplace. All Team Members are expected to adhere to these standards, ensuring 88Spaces' reputation for excellence and integrity remains strong.