



CODE OF ETHICS & CONDUCT

VERSION 1
AUGUST 2020

CODE OF ETHICS & CONDUCT LOINETTE CAPITAL LIMITED

1. The officers, managers and employees of LCL (alternatively the “Company”) shall:
 - 1.1. Act for the benefit of the Company at all times;
 - 1.2. Observe and comply with all relevant laws wherever they operate;
 - 1.3. Co-operate with all responsible authorities in the jurisdictions where it operates;
 - 1.4. Act in a manner which recognises that integrity and responsibility are essential to win and maintain the confidence of LCL in all aspects;
 - 1.5. Conduct its businesses in a professional manner and in accordance with sound business practice;
 - 1.6. Ensure that its employees are thoroughly and appropriately trained, knowledgeable and competent in all aspects of the Company which are relevant to the proper performance of their duties and responsibilities;
 - 1.7. Respect and preserve the confidentiality of their clients and shareholders in LCL;
 - 1.8. Not use information provided by clients which has not been made public for their own or others benefit as this may amount to insider dealing;
 - 1.9. Ensure that the overriding principle in managing the Company is for the benefit and interest of shareholders and other stakeholders;
 - 1.10. Ensure that all documentation in relation to the Company is written as clearly and as simply as is practicable;
 - 1.11. Provide shareholders with all requisite documentation promptly;
 - 1.12. Abide by all policies and shall ensure that shareholders are given adequate warning of any proposed changes in policy;
 - 1.13. Not engage in any professional conduct involving dishonesty, fraud, deceit or misrepresentation or commit any act that reflects adversely on his/her honesty, trustworthiness or professional competence;
 - 1.14. Not offer or receive any gift which is likely to create any conflict of interest or the appearance of one. Records of all gifts and benefits received or given should be maintained.
2. This code of ethics and conduct will be binding on all officers, managers and employees of LCL.
3. Professional misconduct in misrepresentation and fraudulent, dishonest or misleading conduct by any officer, manager or employee of LCL will result in disciplinary action and prosecution where applicable.

Authorized by the Loinette Capital Limited Board of Directors