

Continental Holdings Corporation

Code of Conduct

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Revision History

Sequent No.	Date	Version	Description
0	Jul. 3, 2017	1.0	First Release

Purpose

These guidelines set forth a code of ethical standards by which the company, and its branches and subsidiaries (hereafter referred to individually or collectively as “the Company”), Directors, Supervisors, Management Staff, and all employees must abide by and for the understanding and acknowledgement of its stakeholders.

1 Scope

This Code of Conduct shall apply to all the staff of the Company, its Directors, Supervisors, Management Staff and all employees (hereafter referred to as “Employees”).

2 Principle of Integrity

Employees are expected to conduct themselves in a professional manner and uphold the principle of honesty at all times when conducting business on behalf of the company.

3 Prevention of Conflict of Interest

Employees shall strive to be objective and efficient in executing their duties on behalf of the company and must abstain from misusing their positions to obtain improper gain for themselves, their spouse, parents, children, or relatives.

Employees shall be proactive in reporting potential conflicts of interest to the Company and, in accordance with the law and Company regulations, do their utmost to resolve or avoid such situations. In accordance with the company policy, such reports shall first be presented to the Audit Committee for review. Upon approval of the Audit Committee, the reported item will be presented to the Board for final resolution.

4 Non-Solicitation of Employees

Employees shall always conduct business with the best interest of the Company, and be careful to avoid the following actions:

- (1) Seek opportunities for personal gain through improper use of company assets, information, or their position within the company.
- (2) Exploit opportunities to compete directly or indirectly with the Company.

5 Protection of Trade Secrets

Employees bear the responsibility to keep confidential and not disclose any and all sensitive information pertaining to the company unless otherwise required by law. The above mentioned information includes, but is not limited to Trade Secrets, Technical Data, Intellectual Property and other secret information the disclosure of which may jeopardize the Company or its clients.

6 Fair Trade

Employees must conduct all business dealings with clients, competitors, and employees in a fair manner, and are prohibited from manipulation, nondisclosure, or otherwise misuse of information obtained in their position. Furthermore, Employees are forbidden from obtaining improper benefits through misrepresentation of important matters or from other unfair business practices.

7 Prevention of Insider Trading

Employees must comply with all laws and regulations concerning insider trading, purchase or sale of securities, and misuse of nonpublic information governed under the applicable securities laws. Employees shall not engage in purchase or sale of company shares on their own or in proxy prior to or up to 18 hours after the announcement of events which may bear significant impact to the stock price of Company shares is made public.

8 Protection and Proper Use of Company Assets

It is the responsibility of Employees to protect the assets of the Company and ensure that they are efficiently and legally used for the business dealings of the Company.

9 Legal Compliance

Employees must always abide by the Securities and Exchange Act, other statutory rules and regulations applicable to the operation of the Company, and Company regulations.

10 Reporting and Non-Retaliation

The Company shall promote the concept of ethical practice internally and encourage reporting of any illegal or unethical activity. Any Employee, upon discovery or become suspicious of any activities within the Company, to be in violation of the law or this Code of Conduct, may report this activity to their supervisor, management or other appropriate contacts within the Company. The Company shall establish the necessary mechanism to ensure the safety of the reporting

Employee and protect them from any retaliatory actions.

11 Disciplinary Action and Appeal Process

Employees found in violation of this Code of Conduct will have their violation reviewed by the Company. If such violation is considered to be material, a disciplinary action shall be determined in a timely manner. Information including name and position of the employee, date and the event of the violation, regulations being violated, and how the event was handled shall be reported to the Board. The Company shall establish a mechanism to allow Employees found in violation of the Code of Conduct an opportunity to appeal against the ruling of their disciplinary hearing.

12 Exemption

Any exemptions from this Code of Conduct must be presented to and approved by the Board.

13 Disclosure

This Code of Conduct, and all amendments hereafter, must be disclosed via internal announcement and published on the company website.

14 Related Policies

The Company shall clearly establish Business Principles, policies, and regulations necessary for the support and execution of this Code of Conduct.

15 Implementation

This Code of Conduct, and all amendments hereafter, shall be reviewed and ratified by the Board before public announcement for implementation, and shall be reported to the Shareholders' Meeting.