

BRAVURA HOLDINGS LIMITED

CODE OF ETHICS

<u>Contents</u>	Page
Message from the Chairman	2
1. Introduction	3
2. Purpose	3
3. Approval, monitoring and review process	3
4. Responsibilities towards Employees	3
5. Responsibilities towards Clients	4
6. Responsibilities towards Shareholders	4
7. Responsibilities towards Suppliers	5
8. Responsibilities towards the Community and Environment	5

MESSAGE FROM THE CHAIRMAN

As Bravura continues to evolve and adapt in an ever-changing and challenging global environment, one thing remains constant, and that is our firm commitment to operate with integrity and transparency, respect for human rights and accepting responsibility for the environments in which we operate.

Our Code of Ethics (“the Code”) is designed to provide a clear understanding of the standards that govern our business and provides guidelines for us to navigate successfully through ethical challenges.

All of our senior leaders, including the board of directors, support this Code and are committed to keeping its values and principles at the core of our operations.

I encourage all Bravura employees and other stakeholders to be thoroughly familiar with the Code in order to better understand how these values impact our day-to-day business decisions and prepare us to respond appropriately when the need arises.

Thank you to all our directors, managers and employees for living our values and for taking personal responsibility for creating a brighter future for everyone.

1. INTRODUCTION

Bravura Holdings Limited and its subsidiaries (“Bravura”) are committed to conduct business in accordance with the highest ethical standards and in compliance with all applicable laws, rules and regulations.

Reputation is a key Bravura asset and reflects its culture and commitment to acting with integrity and high moral, ethical and regulatory standards. This commitment is actively endorsed by the board of directors, and it is expected of all managers and employees to share in this commitment.

2. PURPOSE

This Code of Ethics sets out the guiding principles by which the Board of Bravura expects its stakeholders, namely directors, employees, suppliers and shareholders to behave and interrelate.

3. APPROVAL, MONITORING AND REVIEW PROCESS

The Board of Bravura shall take reasonable steps to ensure that the Code is followed, including the monitoring of the policies, practices and procedures.

The Code shall be reviewed on an annual basis or as and when there is a need to do so in order to meet any new requirements.

4. RESPONSIBILITIES TOWARDS EMPLOYEES

Bravura seeks to attract and retain the best people, and to create the optimum work environment to achieve this.

4.1 Working conditions

Bravura is committed to respect the human rights of all employees, including permanent and temporary employees and contract workers, in the work environment, and to this end will ensure transparent, fair and confidential procedures for employees and contractors to raise any concerns with management.

4.2 Recruitment

Bravura will recruit, employ and promote employees on the basis of the qualifications and abilities required for the work to be performed.

4.3 Development and Training

Employees will be assisted to develop and enhance their individual skills and capabilities required for the work to be performed.

4.4 Rewards

Employees will receive a total remuneration package that meets or exceeds the legal minimum standards or appropriate prevailing industry standards.

4.5 Health, safety and security

The highest standards of health, safety and security will be provided throughout all business operations and activities.

4.6 Equal opportunities, Discrimination and Diversity

Bravura is committed to a policy of equal opportunity for all employees, without discrimination on the grounds of race, age, role, gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, dependants, disability, social class, political views or the like.

This commitment includes consideration for recruitment, redundancy, promotion, reward and benefits, training or retirement, which must all be based on merit alone.

4.7 Harassment

Employees are expected to conduct themselves in a professional manner, with respect and concern for their fellow team members. Consequently, Bravura will not tolerate any harassment based on gender, race, religion, politics, or disability.

Any harassment issues should be brought to the immediate attention of a manager, will be investigated, and may lead to dismissal.

4.8 Use of company assets by employees

Bravura's assets are critical to its business competitiveness and success. These assets include office equipment, computer systems and the data on those systems (including the passwords allowing access to that data). Bravura's assets are provided only for conducting Bravura's business, and any use thereof must be authorised.

5. RESPONSIBILITIES TOWARDS CLIENTS

Bravura is committed to creating sustainable value for its clients, contributing to their businesses and wealth through the design and implementation of legally compliant, bespoke, robust, sustainable and integrated solutions.

Employees should ensure that no conflicts of interests arise with clients, and that all clients are treated fairly at all times.

6. RESPONSIBILITIES TOWARDS SHAREHOLDERS

Bravura conducts its operations in accordance with internationally accepted principles of good corporate governance and provides timely, regular and reliable information on its activities, structure, financial situation and performance to all its shareholders.

7. RESPONSIBILITIES TOWARDS SUPPLIERS

7.1 Gifts

Bravura employees may receive gifts or entertainment from any business partners but they should always be reasonable, never lavish and must not give the impression that the gift or entertainment is intended to influence any business decision. If it is considered too generous, the employee concerned should politely refuse the gift or gesture, or seek guidance from senior management.

7.2 Timely Payment

Bravura pays suppliers on time and according to the agreed terms of trade.

8. RESPONSIBILITY TOWARDS THE COMMUNITY AND ENVIRONMENT

Bravura is committed towards the protection and upkeep of the environment as a whole, and will participate in projects that will uplift the welfare and interests of the community at large.