

Code of Conduct



Mekong Strategic Capital (MSC) is committed to preserving its high legal, ethical and moral standards and aims to foster and encourage a culture of compliance with local and international laws and regulations.

This Code applies to all directors and employees of MSC and covers dealings with all internal and external stakeholders and other third parties.

Standard of Conduct

This Code incorporates the following standards of business conduct that MSC requires for all its Personnel.

- > **Our clients/investors come first.** The best decisions for our clients/investors are the best decisions for MSC. MSC Personnel must at all times place the interests of Advisory Clients ahead of their personal interests.
- > **Ethics and integrity** are central to our value system. We seek employees and business partners who share this view. MSC personnel should not engage in any act, practice, or course of business which is fraudulent or deceitful upon an Advisory Client.
- > MSC values the confidence and trust placed in us by our Advisory Clients. The fiduciary duties owed to our Advisory Clients are to protect Advisory Client assets (including non-public information about an Advisory Client or an Advisory Client's investment) and act always in the best interest of our Advisory Clients. We must also strive to identify and avoid conflicts of interest, however such conflicts may arise.

Compliance with Laws & Regulations

MSC and its employees must adhere to all legal and regulatory provisions, best practices and rules of professional conduct within the markets in which the firm operates. We operate on a 100% compliance to all local and international laws including regulations specific to taxes and industry-specific rules.

Conflicts of Interest

MSC seeks to ensure that clients' interests are always at the forefront of its activities and that all its employees are sensitive to conflicts and apply appropriate measures to manage or prevent known conflicts of interest.

- > Any member of the investment team and investment committee must declare any potential conflict of interest with regards to any investment under consideration
- > Any member of the Investment Committee and Investment Team and its affiliates who has the intention to invest (either as a debt, equity or any type of investment vehicle) in any investments, either privately or through an affiliated entity, that may conflict with the objectives of existing investment vehicles, must be first declare such intention to the Investment Committee, prior to such action
- > Any member of the Investment Committee and Investment Team who has a stake (equity, debt or any type of investment vehicle) in a business that may generate substantial revenue from an MSC related investment under consideration, must declare such holding(s) to the Investment Committee



Data Protection & Privacy

MSC is committed to protecting the privacy, interests and fundamental rights of individuals and pays close attention to the processing of personal data. Employees are required to maintain and preserve the confidentiality of personal data entrusted to MSC by its clients, contacts, employees and investors.

Anti-Bribery & Gifts

MSC operates a zero tolerance approach to the offering or receiving of bribes in any form. All employees and service providers are expected to conduct themselves with integrity, impartiality and honesty at all times. Gifts given to or offered by employees or MSC's service providers as a reward, inducement or encouragement for preferential treatment or improper or dishonest conduct are strictly prohibited. Furthermore, employees must not solicit gifts of any type or value.

Harassment & Discrimination

MSC is proud of its professional and harmonious work environment and does not tolerate any form of harassment or discrimination in the workplace by any employee for any reason. MSC requires all employees to respect their colleagues, treat one another with courtesy, consideration and professionalism and always ensure they act appropriately for a work environment. Every employee is responsible for helping avoid and preventing harassment and discrimination. Where a person witnesses any form of harassment and discrimination, the person should intervene and offer support to the victim and inform a senior member of staff immediately upon becoming aware of it.