



# Total Code of Conduct

## Introduction

Total Credit & Risk Management Group (“Total Credit”), has grown to become one of Asia Pacific’s leading credit and risk management companies, providing insight that supports everyday decision-making in more than 100 countries worldwide.

The Total Credit brand stands for trust and confidence. Conducting ourselves with the highest level of integrity and business ethics is paramount in delivering on Total Credit’s brand promise. The Total Code of Conduct (“Code”) outlines the basic principles of business ethics and legal requirements that are applicable in today’s dynamic environment.

What we do is important, but how we do it is no less important. If our business is to continue to grow and develop successfully, we need to ensure the trust of our clients, employees and business partners.

Laws may differ from country to country, and Total Credit will always uphold these fully, but our Code is universal. It is the basis upon which we conduct all our relationships, both internally and externally. Each of us has a duty to abide by these principles and to ensure there is never any gap between what we say and what we do.

Every member of Total Credit’s Board of Directors and Management Team is fully committed to conducting business in accordance with the Code and in helping set the tone for our company.

## Total Credit Values:

1. Conduct ourselves with the highest level of **Integrity** and business ethics
2. Pursue an unrelenting quest for **Quality**
3. Reach for the highest standards of **Performance**
4. Place the interests of **Customers** first; our success depends on their success
5. Commit to **Teamwork**; seek out and utilize the ideas and skills of all staff members

For over 25 years, Total Credit has been a trustworthy partner of businesses large and small. Today, our commitment to conducting business ethically and in compliance with the letter and spirit of the law is reflected in our Values —Integrity, Quality, Performance, Customers and Teamwork.

These Values set the standard by which we must measure ourselves each day. They require us to conduct business honestly and with integrity, in every interaction with all of our stakeholders—customers, team members, shareholders, business partners and suppliers.

The Total Code of Conduct serves as a guide to translate our Values into everyday behaviour, to guide us when in doubt and to keep us working toward a common goal—to behave ethically and in accordance with our Values and applicable laws.

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Total Credit believes in only doing business with suppliers, consultants and other business partners who demonstrate high standards of ethical business conduct. We seek to establish mutually beneficial, long-term relationships with our business partners.

We conduct business in many countries. Many laws, local customs and social standards differ greatly from one place to the next. Our policy is to abide by the laws of the countries in which we operate, unless such laws or practices violate applicable Hong Kong law.

We are each responsible for living by our Values. Acting with integrity means that we hold ourselves and our suppliers, contractors, consultants and other business partners to the standards set forth in this Code. Integrity means that we adhere to all applicable Total Credit policies and laws.

Failure to comply with the Code and other Total Credit policies can have severe consequences for both Total Credit and the people involved. In addition to damaging our brand, conduct that violates the Code may also violate the law. This can subject Total Credit and those involved to civil suits and/or criminal prosecution. Total Credit will impose disciplinary action for violations of the Code and Total Credit policies, including termination of employment and recovery of damages in appropriate cases.

## **Total Compliance Cornerstones:**

### **Cornerstone 1 – Code of Conduct**

No book or code of ethics can provide all the answers or cover every possible situation. Therefore, our Code only serves as a guide to ethical conduct. In some circumstances, the right thing to do will be obvious. In others, it may be difficult for you to choose the right course of action.

To report complaints directly to our Complaints and Compliance Department, you can send an email to: [complaint@totalcredit.hk](mailto:complaint@totalcredit.hk) or call (852) 28506682. You can report anonymously if you prefer, although maintaining anonymity may limit our ability to effectively investigate your concerns.

The Compliance Department is charged with the implementation and administration of this Code. The Compliance Department also exercises overall control over compliance activities across the Company to promote the importance of business ethics and compliance with applicable laws, regulations and internal policies.

Total Credit will investigate all reports promptly, thoroughly and fairly, and will take appropriate action in accordance with our Complaints Handling Process. We have an obligation to comply with any investigation and share information openly and honestly. We will endeavour to safeguard your confidentiality and, if applicable, your anonymity. We will endeavour to communicate back to you once the investigation is complete.

### **Cornerstone 2 – Providing a Safe & Ethical Working Environment**

People are the cornerstone of our business. Our continued success depends largely on our ability to attract and develop a diverse work force of qualified people. We are committed to providing a work environment that fosters respect for all team members, customers, suppliers, consultants and other business partners.

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### **Diversity**

Total Credit believes in hiring, promoting, compensating, and terminating employees solely on merit, without regard to race, color, age, gender or sex, ancestry, religion, national origin, citizenship, sexual orientation, marital status, medical condition, pregnancy, disability, or any other basis prohibited by local law.

Total Credit does not condone any form of harassment, as noted in our Equality and Diversity Policy. This includes harassment based on race, color, age, gender, ancestry, religion, national origin, citizenship, sexual orientation, marital status, medical condition, pregnancy, disability or any other basis prohibited by local law.

Sexual harassment involves unwelcome sexual advances, requests for sexual favors or other physical or verbal conduct of a sexual nature. All forms of harassment can interfere with an individual's work performance or adversely affect an individual's employment opportunities. Harassment will not be tolerated, regardless of whether you are on company premises or are engaged in off-hours or off-site business-related functions, such as holiday parties or business travel

### **Health and Safety**

Total Credit is dedicated to providing a safe, healthy and productive work environment for all employees.

Total Credit does not tolerate acts (or the threat) of workplace violence committed by or against employees. Acts of violence include, among other things, damaging property intentionally, possessing, brandishing or using a weapon, engaging in behavior that creates a reasonable fear of injury in another person, or threatening or inflicting injury to another person.

Reports of violent behavior or threats will be investigated. Team members who engage in violence or threats of violence will be subject to disciplinary action, including termination of employment, recovery of damages and criminal prosecution in appropriate cases.

Total Credit is a drug free workplace, and is committed to maintaining a work environment that is free from the influence of illegal drugs and controlled substances. To this end, the possession, solicitation, or use of illegal drugs, or being under the influence of such drugs on Company time, while on Company property, or at any Company sponsored event, is prohibited and will not be tolerated.

### **Cornerstone 3 - Acting in the Best Interest of Total Credit and Our Shareholders**

A conflict of interest can arise when judgment could be or might appear to be influenced, by the possibility of personal benefit. Employees should always be aware of possible conflicts and look to avoid them. All employees are responsible for notifying their manager about any situation that they think creates, or could create, a conflict of interest or the appearance of one.

### **Financial Investments**

All employees have a responsibility to make sure that personal financial activities do not conflict with any responsibilities as an employee. A financial conflict of interest could impair your judgment or give the impression that your judgment is impaired.

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### ***Gifts and Hospitality***

The giving of business gifts is a customary way to strengthen business relationships and, with some restrictions, can be a lawful business practice. It is Total Credit's policy that employees may give and receive appropriate, lawful business gifts in connection with their work with commercial customers and other non-governmental parties, provided that all such gifts are modest in value and not given or received with the intent or prospect of influencing the recipient's business decision-making. You should never accept a payment made to you for the purpose of influencing you to award business to a client, vendor or other person. Before offering, providing or receiving any gift or hospitality you should consider carefully the terms of Total Credit's Anti-Bribery Policy and, if necessary, seek the appropriate approvals.

### ***Outside Employment***

Sometimes taking outside employment may create a potential conflict of interest. You may not take another job that interferes with your ability to do your job at Total Credit, such as by conducting an outside business during working hours or using Total Credit property, equipment or information for non-Total Credit uses. In addition, you may not take outside employment with a supplier, competitor or partner of Total Credit.

### ***Protecting Total Credit's Brand & Reputation***

We have become a leader in the credit and risk management industry through a constant focus on data quality and customer service. Our customers trust us to provide them with high-quality, reliable information every day, and to keep confidential information to ourselves. We must strive every day to meet those expectations. We must each work diligently to protect both our quality reputation and our highly-respected brand, because damage to either would have a serious impact on the company.

We are responsible for maintaining and building Total Credit's greatest asset—our brand—which stands for trust, confidence and the value we provide to our customers. We all have an obligation to strengthen and protect Total Credit's trademarks, copyrights and other intellectual property.

### ***Data Privacy & Security***

Information is the lifeblood of any company. Open and effective exchange of information is especially critical to our success. However, much of the information concerning our own and our customers' business activities is confidential. The disclosure of this information outside Total Credit could seriously damage the integrity of Total Credit's brand, reputation and success. Safeguarding this information is everyone's responsibility, and Total Credit is committed to maintaining the privacy and security of information and to meeting our legal requirements to do so everywhere we do business around the world.

Much of the information we handle daily needs to be protected from unnecessary disclosure. Trade secret, confidential corporate information and confidential personal information about Total Credit, our colleagues, our customers, consultants, suppliers, and business partners, including business records, financial results, sales figures, personnel records and all other business or personal information must be safeguarded from loss, theft, damage or exposure to unauthorized people. These restrictions include both individuals outside the company and people within Total Credit who do not have a business-related need-to-know.

### ***Protecting Customer and Other Third Party Information***

Our customers routinely share their own confidential information with Total Credit. We each have an obligation to protect that information just as carefully as we protect our own information. Our customers, suppliers, consultants and business partners expect this from us and the integrity of our Brand demands this of us.

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#### **Cornerstone 4 – Complying with Laws**

Anti-corruption laws, including the Prevention of Bribery Ordinance (PBO), U.S. Foreign Corrupt Practices Act (FCPA) and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, apply to all of our operations.

Total Credit does not condone any act involving fraud, bribery, corruption, dishonesty or deception. This includes all acts of theft, any acts that knowingly facilitate fraud or theft by others, and any acts designed to hinder the detection or investigation of fraud or theft. Total Credit has internal policies and processes designed to prevent, detect and report fraud, theft or corruption and employees are required to abide by such policies and processes.

No officer, employee, agent or other representative of Total Credit may, directly or indirectly or otherwise through any third party, offer, provide, authorize, request or receive a bribe (including but not limited to a bribe to or from a public official) or anything which may be construed as a bribe for any purpose or perform their functions improperly in anticipation or in consequence of any bribe.

A bribe includes the offer, provision, authorization, request or receipt of anything of value as an inducement or reward for the improper performance of a relevant function by the recipient (although in the public context inducing or rewarding even proper performance can be a violation) or where it is otherwise improper for the recipient to request or receive the relevant advantage or benefit.

#### ***Fair and Ethical Sales Practices***

Total Credit Values require that every time, with every action, we act with integrity and business ethics; make decisions that serve the best interests of Total Credit and our customers; and not deceive, defraud or misrepresent facts. This conduct is essential at all times, and is critical for us to reach our aspiration to be most trusted. None of us may ever allow a misguided sense of corporate loyalty to lead us to disobey the laws of those countries in which we operate or our Values. Besides being the right thing to do, ethical conduct is good business practice. Customers, suppliers, consultants, or business partners may not continue to do business with us if they feel we have mistreated them or that we are unethical.

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