

CELLCARD CODE OF BUSINESS ETHICS



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Cellcard's Vision Statement

To be Cambodia's leading provider of services that enhance customer's digital lifestyle.

Cellcard's Mission Statement

To provide innovative and insightful solutions that complement our customers' digital needs, delivered by highly qualified employees creating long term shareholder value.

Cellcard Values

INNOVATIVE

We work hard towards bringing new solutions to customers or operation aimed towards finding new and better ways.

PASSIONATE

We are bold. We believe in what we do and strive to do things better, demonstrated through constant improvements.

TRUSTED

We are loyal to our word and commitments.

TRANSPARENT

We believe in being open and honest. That is why we try to make things simple, creating solutions that are easy to understand.

FUN

We value relationships and happiness. We aim to incorporate enjoyment in our work and to provide enjoyment to our customers.

Your commitment to Cellcard involves understanding and sharing Cellcard Vision & Mission and internalizing Cellcard Core Values.

Guiding Principles

I. Use of Business Ethics Guidelines

- The Code of Business Ethics provides general guidelines for employees in regards to the legal and ethical questions that concern Cellcard.

In every aspect of our lives, it is important that as individuals, we follow the law and act in an ethical manner. The Code of Business Ethics provides guidelines on how to resolve ambiguous issues that Cellcard and its employees may face. In addition to this, employees are obliged to follow Cellcard policies, directives, and guidelines, which may vary among various departments and divisions of the company.

It is important to know that as an employee, these guidelines are made to influence you in making the right business decision, however, in the end, you are your own person, and you are the one who is deciding. Before making business decisions seek the Code of Business Ethics or simply ask your HR Business Partner or line manager for advice. Cellcard assumes that in every business decision, you will make the right one based on the guidance of the Code of Business Ethics and your co-employees.

II. Commitment to Business Ethics

- All Cellcard employees are expected to follow the Code of Business Ethics to preserve Cellcard's reputation as the standard for quality, value and service in Cambodia.

Cellcard is committed to promoting integrity and maintaining the highest standard of ethical conduct in all of its activities. As such, Cellcard employees are required to follow the Business Ethics guidelines described herein.

III. Legal Compliance

- It is Cellcard policy that it will operate in compliance with all legal and regulatory requirements applicable. As such, each employee is expected to comply with the legal and regulatory framework in performing their jobs. Each employee must be aware of the law and business practice requirements affecting their area of responsibility.
- Disregard for the law will not be tolerated as individual employees are acting on behalf of the company. It is each employee's responsibility to be aware of the law and, if in doubt as to any aspect, they should consult with the Line Manager, Department Head, HR Division, or the Business Unit's Chief Executive Officer.

IV. Commitment to Zero tolerance to Gender-Based Violence and Harassment

Cellcard unequivocally commits to maintaining a zero-tolerance policy towards all forms of gender-based violence and harassment. We recognize that gender-based violence and harassment are widespread problems that jeopardize people's safety, well-being, and sense of dignity—especially for women and vulnerable communities.

Cellcard will not tolerate any acts of Gender-Based Violence and Harassment. This includes:

- Abuse of power and Coercion
- Unwelcome Comments or Jokes
- Unwanted Physical Contact and Physical Violence
- Sexual Advances or Propositions
- Bullying and Intimidation
- Verbal and Emotional Abuse
- Sexual Harassment
- Marginalization of Minority Groups such as LGBTQ+ individuals, people of color, or individuals with disabilities
- Systemic Gender Bias
- Retaliation Against Whistleblowers

We are dedicated to implementing policies and procedures that prevent, address, and eradicate such behaviors in our workplace. These policies will include clear definitions of prohibited conduct, reporting mechanisms, and pledge to provide confidential support and resources for those who experience gender-based violence or harassment, ensuring they have access to the assistance they need to navigate such situations and seek justice.

V. Commitment to Zero tolerance to modern slavery and child/forced labour

Cellcard is committed to maintaining a zero-tolerance policy towards all forms of modern slavery, child labor, and forced labor within our operations and supply chains.

We are dedicated to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Cellcard recognizes the horrific violations of human rights and dignity that modern-day slavery and child/forced labor represent. As such, we are dedicated to upholding the highest ethical standards while making sure that our company's operations correspond with our guiding principles of fairness, integrity, and humanity.

VI. Commitment to not tolerate child/forced labour, modern slavery, GBVH, discrimination within CellCard's Contractors, subcontractors and suppliers

Cellcard is firmly committed to maintaining a workplace and supply chain free from all forms of child/forced labor, modern slavery, gender-based violence and harassment (GBVH), and discrimination. We hold our contractors, subcontractors, and suppliers to the same high standard.

Moreover, we maintain zero tolerance for gender-based violence and harassment (GBVH) in any form. It is our firm belief that every individual should feel safe, respected, and valued in their workplace environment, regardless of gender or any other characteristic.

Additionally, discrimination of any kind is not tolerated within Cellcard or among our contractors, subcontractors, and suppliers. We are committed to providing equal opportunities for all individuals and fostering an inclusive environment where diversity is celebrated.

We expect our contractors, subcontractors, and suppliers to adhere to these same principles and to implement appropriate policies and practices to prevent and address child/forced labor, modern slavery, GBVH, and discrimination within their own operations.

At the Workplace

I. Relationship with Colleagues

- Treat your colleagues with respect and dignity. All employees are entitled to a working environment which is free of harassment and discrimination.

In Cellcard, we believe that a working environment free of harassment and discrimination contributes to Cellcard's success. Cellcard will not tolerate any acts harassment and discrimination. These include:

- Bullying
- Racial discrimination
- Offensive jokes and derogatory comments
- Verbal and Physical threats
- Discrimination on grounds of religion
- Gossiping

Cellcard expects its employees to maintain a pleasant working environment by having amicable relationships among the people in the workplace.

II. Relationship with Customers

- Treat your customers as you do your colleagues – with respect and dignity.

A Cellcard employee must exhibit the highest degree of professionalism and courtesy towards its customers at all times. In addition, an employee must refrain from providing personal opinions that would be detrimental to the interests of the company.

In instances where a customer approaches an employee and asks the employee to perform unlawful and unethical actions which are not in the best interests of the company, the employee

must report to his or her department head immediately. If an employee is found to disobey this policy, the penalty for the employee is instant dismissal which may further lead to criminal proceedings.

III. Raising Concerns and Reporting Violations

- If an unlawful or unethical situation occurs, it should be reported to the right authorities of the organization.

If you know of employees conducting unlawful or unethical acts against you or against the company, do not hesitate to report this to the management. Raising your concerns to the Line Manager is usually the best place to start. Some employees tend to hide these concerns for fear of being threatened by the person conducting the unlawful or unethical act. In this regard, the below policies are being enforced:

i. Whistleblower Policy

- Whistleblowing is the act of informing respective authority regarding unlawful or unethical acts. This policy protects the informant or the “whistleblower” if he or she discloses the information in good faith, believes his or her information is substantially true, if he or she does not act maliciously or make false allegations, and if he or she does not seek personal or financial gain.

ii. Non-retaliation Policy

- The organization will promptly view an employee’s report of unlawful and unethical act, and it will not tolerate threats against the employee for making that report.

iii. Reporting Channel

- All employees, Vendors, contractors, subcontractors, and suppliers can make the disclosure through a single secured channel below:

Email address: whistleblowing@cellcard.com.kh or through phone number: +855 77 333 915 (HR)

This email account can be accessed by: CEO, COO, Head of Legal and Regulatory, Head of HR, Head of Cybersecurity and Head of Internal Audit.

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In the Marketplace

I. Working with other organizations

- Employees must take extra care when dealing with other organizations as disclosing confidential information even inadvertently could affect the company's plans, strategy and reputation.

Each business relationship Cellcard is involved in, should be handled in accordance with the Business Ethics guidelines. When dealing with other organizations, most especially competitors, it is important to take caution in your conversations with the other party. It is usual to have a run-in with a representative from another organization. Acceptable conversations include sales to other companies in the same industry as well as the purchases from them; attendance at business shows, and participation in joint bids. However, caution is still required. In addition, discussion or collaboration on specific subject matters with competitors are prohibited, and can be illegal. These are the conversations that should be avoided:

- Pricing policies
- Costs
- Contract terms
- Marketing and product plans
- Inventories
- Production plans
- Studies and surveys

If a competitor ignites a conversation regarding these, even inadvertently, an employee is expected to object and stop the conversation immediately and if necessary, leave the meeting and report it to Cellcard authorities.

II. Competing Fairly

- Fair competition laws promote vigorous competition in a free market. However, organizations must compete ethically, and in compliance with organization policies and the law.

i. Statements about competitors

- Avoid false and misleading statements about competitors, their products, and their services.
- Make sure that facts concerning other organizations or competitors are substantiated and complete

III. Confidentiality

- Sharing confidential information, whether personal or organizational, may be detrimental to the organization's success. Proprietary information is a valuable asset and is to be protected at all times. No employee is to divulge any information regarding the operation

of Cellcard or any of its records to any party unless it is in the normal course of performance of their jobs or the Executive approval has been sought.

- i. **Information about others (clients and customers)**
 - In business, it is normal to acquire information about other organizations, even competitors. However, improper means of gathering information from others will not be tolerated. Illegal means of gathering data include:
 - Hacking
 - Setting up and using hidden surveillance cameras
 - Wiretapping calls
 - Bribing competitor’s employees
 - Stealing
 - Trespassing
 - Information about other organizations should be taken with caution and discretion. This information should only be used in the proper context and should only be disclosed to the authorized employees of Cellcard.
- ii. **Confidential information owned by others**
 - If an employee inadvertently receives confidential information about an individual or an organization, he or she must be careful to prevent any accusation that Cellcard misused or misappropriated that information. You should not receive confidential information from others unless you have the authority to do so and there is an authorized agreement of confidentiality between Cellcard and the other party or parties.
- iii. **Confidential information owned by Cellcard**
 - To use Cellcard’s non-public information for personal financial benefit or to inform others who might make investments based on this information is not only unethical, but also illegal. Doing so will merit possible dismissal from Cellcard.
- iv. **Receiving and giving gifts, amenities, and bribes**
 - An employee or his or her family may not directly or through others, accept any kind of gift or amenity that would influence or could give the appearance of influencing Cellcard’s business relationship with that individual or company.
 - All Cellcard employees are not allowed to accept any gift or benefit from either a company or individual with whom there has been a past, present or possible future relationship with the Company

- All gifts or entertainment must be made known to the Head of Department and HRBP prior to accepting
- Any gift or entertainment within the normal business limits may be accepted, but anything more than \$100 should have the advance approval of the CEO.

IV. Conflict of Interest

Employees have an obligation to give their complete loyalty to the best interests of the company. They should avoid any action which may involve, or may appear to involve, a conflict of interest with Cellcard. Employees should not have any financial or other business relationships with suppliers, customers or competitors that might impair, or even appear to impair, the independence of any judgment they may need to be made on behalf of the company.

Therefore, it is company policy that employees may not:

1. Perform services for or have a financial interest in a private company that is, or may become, a supplier, customer, or competitor of the company.
2. Perform outside work or otherwise engage in any outside activity or enterprise that may interfere in any way with job performance or create a conflict with the company's best interests.

An employee must disclose all circumstances that constitute an actual or apparent conflict of interest. If in doubt an employee should check first with their Line Manager, Head of Department or HR Division.

To avoid any misunderstanding or confusion, an employee must declare their outside business interests, including ownership or decision-making influence in a private business.

- Refer to Policy HR-CAM-026, Conflict of Interest Policy for details. When in doubt, always consult with your Head of Department or HR Business Partner.

V. Speaking publicly and Social Media

- When an employee speaks out in public or in social media, he or she does so as an individual. An employee must not give the appearance of speaking or acting on behalf of the company. Cellcard employees must be aware that activities or posts in social media can be monitored by clients and colleagues, as such, posts undermining the reputation and image of the company may result in disciplinary action against their authors.

Further Guidelines

- Cambodian Labor Law

- This law governs employee-employer relations resulting from employment contracts to be performed within Cambodia, regardless of where the contract was signed and the nationality and residences of the agreeing parties.
- HR Policies
 - Internal policies regarding recruitment, training, and compensation and benefits.
- Performance Development Potential (PDP)
 - Appraisal method to manage an employee's personal development. The employer goes through a process of employee evaluation. This process consists of planning, monitoring, developing, rating performance, rewarding the great performer and dealing with the poor performance.
- Disciplinary Management
 - A guide on how to manage discipline in the workplace. Consists of information regarding types of offenses, disciplinary actions, and consequences.

Cellcard Policies and Forms may be requested for employee perusal by contacting the Employee Services at: hr911@cellcard.com.kh