



## **COMPLIANCE POLICY STATEMENT**

## **Compliance Policy Statement**

Demerara Associates is committed to fully comply with applicable laws and regulations to conduct our business activities. This policy has been established to describe our approach to compliance.

This policy statement is an overview; greater details of our compliance principles and our expectations in business ethics are covered in our other relevant policies, including Code of Conduct and Statement of Business Integrity. Individual Business Unit has also its own guidelines / policies for industry-specific compliance laws and regulations.

### Scope

It is applicable to all Business Units and the employees.

### Our principles

In terms of compliance, Demerara Associates

- Fully complies with applicable laws and regulations, including but not limited to the areas concerning prevention of bribery, anti-corruption, conflict of interest, insider dealing, competition, environmental protection, discrimination, employment, occupational safety and health, data privacy and intellectual property rights.
- Adopts a zero-tolerance approach for behavior that may involve breaches of legislations, especially those expose our businesses to criminal risks.
- Fosters a corporate culture of compliance through maintaining a sound internal control system, regular trainings and clear communications.
- Implements a Whistleblowing Policy and Supporting Procedures which encourages our employees to raise concerns about any suspected misconduct or malpractice to Demerara Associates.
- Conducts compliance risk analysis on a regular basis. Formulate action plans if applicable.
- Assesses compliance on a regular basis to ensure relevant obligations are appropriate and valid.

### Note

This policy will be reviewed and updated from time to time with the latest version posting on the company's website.