



**ASIA
INTERNATIONAL
SCHOOL LIMITED**



CODE OF CONDUCT





AISSL

Code of Conduct

Table of Contents

1. Message from the Chief Executive Officer

2. About our Code of Conduct

3. Care about our Employees, Parents, Students and Communities

- Promoting a Positive & Caring Workplace
- Respecting Equal Opportunities
- Embracing Diversity and Inclusion
- Addressing Harassment and Bullying
- Safeguarding & Child Protection
- Committing to Human Rights, The Environment and The Community

4. Demonstrate Work Ethic, Fairness and Accountability

- Avoiding Conflicts of Interest
- Making Political Contributions and Taking Part in Political Activities
- Maintaining Transparency to Deal with Suppliers and Third Parties
- Conducting Business without Bribery, Corruption or Fraud
- Protecting our Confidential Data, Personal Information, Intellectual Property and Assets
- Competing Fairly Locally and Globally

5. Maintain Good Business Practices

- Protecting our Brand & Reputation
- Following Health, Safety & Security Standards
- Managing Cyberspace, Social Media & Networking

6. Respond, Comply, Report

7. Addendum to the Code of Conduct

Message from Chief Executive Officer

Dear Colleagues,

As a leading education group of companies, we envision AISL as an education operator that is recognised as a responsible employer who values the wellbeing and continuous development of our people, and emphasises quality, operation excellence, and financial sustainability of our organization. Key to performance in these areas is echoing to our commitment to operating our schools and business ethically and with high integrity.

Our Code of Conduct is intended to be the guiding principles for all AISL employees including employees at the school level. Our employees are expected to understand the purpose of the Code, act with integrity, make good judgement and always comply with applicable laws. This Code will help you navigate difficult situations you may encounter in your daily work and guide you to respond to and report on any breaches of the Code effectively and in accordance with the Group's policy and procedures.

You have the obligation to read, acknowledge and sign the Code to demonstrate your personal commitment to it. You should follow the Code for any course of action in your daily work, regardless of location or position in the Group without any exception.

Your collaborative efforts and support to safeguard our brands and reputation by acting with integrity, ethical standards and honesty will be the cornerstone for AISL's success and continuous growth in coming years.

Thank you for following our Code, living our values, and creating our promising future together. ❖

Yours sincerely

Bryce Wan

Chief Executive Officer

About our Code of Conduct

The Code of Conduct (“Code”) sets forth a common set of expectations that our employees are committed to always acting with integrity in all activities which is the foundation for the development and continuous success of Asia International School Limited (AISL). This Code provides our employees with the guiding principles to help govern their conduct with students, parents, suppliers, vendors, shareholders, fellow employees, regulators, markets and the communities in which we operate.

The Code applies across the entire AISL Group of Companies (“the Group”), its subsidiaries, affiliates, associated companies, suppliers, contractors, service providers, entities receiving services from the Group, and any employees of the above mentioned. All employees of AISL, irrespective of their positions and functions, are expected to fully adhere to the principles contained in the Code.

The Code is designed to be consistent with applicable laws and regulations. To the extent any local law or regulation is more restrictive than the Code, the local law or regulation prevails. Local policies and supplemental guidance complement the principles embodied in this Code and the Harrow Standards. It may be amended as required by law and regulations and in line with the expansion and development of the Group. All amendments are effective immediately upon posting. The Code can be accessed via our AISL HR Portal and must be acknowledged by individual employees upon commencement of their employment.

In general, the Code includes fundamental obligations, principles and guidance for our employees. You are also obliged to understand and follow the local law, regulations and policies applicable to you.

The Code is not meant to outline specific guidance on every situation that may take place. Instead, it is principle-based guidance that helps you consider difficult questions, promotes consultation, and encourages you to speak up if you have concerns. ❖

Care about

our Employees, Parents, Students and Communities

Promoting a Positive and Caring Workplace

The Group is committed to creating and maintaining a positive work environment and treating people with respect and care. This commitment underpins our ability to hire and retain good employees and to have a productive and motivated workforce.

We encourage collaboration across territories and regions. Respect and trust are indispensable elements to this collaboration, as it helps our engagement and interaction with fellow employees, students, parents, other stakeholders. Trust begins with each of us treating each other with care, courtesy, dignity, fairness, and respect. ❖

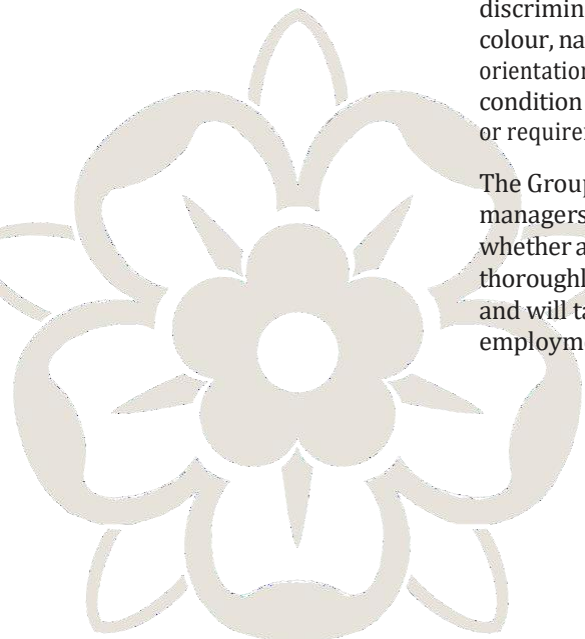
Respecting Equal Opportunities

We are committed to providing a fair and equitable workplace environment for all employees. We uphold the responsibility to deal with any discriminatory act in the workplace.

Each employee is responsible for complying with respective anti-discrimination laws in his/her location.

Discrimination can be direct or indirect, neither of which are not tolerated. Direct discrimination occurs when a person is treated less favourably because of age, race, colour, national origin, appearance, religion, mental or physical disability, gender, sexual orientation, pregnancy, marital status, family status, other protected characteristic or other condition recognised in law. Indirect discrimination occurs when an internal policy, rule or requirement which applies to everyone, has a detrimental effect on one particular group.

The Group encourages employees to report all incidents of discrimination to their line managers or the Human Resources Department. Violations of this Code, regardless of whether an actual law has been violated, will not be tolerated. The Group will promptly, thoroughly, and fairly investigate every issue that is brought to its attention in this area and will take disciplinary action, when appropriate, up to and including termination of employment. ❖





Embracing Diversity and Inclusion

The Group values the diversity of workforce as a competitive advantage that nurtures and expands. We are committed to working collaboratively as a team and embracing differences regardless of age, race, colour, national origin, appearance, religion, mental or physical disability, gender, sexual orientation, pregnancy, marital status, family status, etc.

We respect our employees, students, parents, vendors, partners, other stakeholders from diverse backgrounds, experiences, circumstances, and interests, who speak different languages, understand different culture and norms, and share different perspectives and opinions.

We believe a diverse team harnesses differentiated thinking. We are committed to promoting a culture in which our employees feel safe to share their ideas and experiment with different solutions which will help drive innovation, growth in new directions, and breakthroughs to accomplish our mission. ❖

Addressing Harassment and Bullying

The Group is dedicated to promoting a safe working environment free from harassment and bullying. Harassment and bullying include verbal, physical or behavioural acts towards someone which make them feel intimidated or offended.

Examples of bullying or harassing behaviour include:

- physical touch and abuse
- spreading malicious rumours
- unfair treatment
- picking on or regularly undermining someone
- denying someone's training or promotion opportunities

Bullying and harassment can happen:

- face-to-face
- by letter
- by email
- by phone
- by electronic media



Harassment is different from bullying in that it is a form of discrimination which represents the unwanted behaviour in relation to the discrimination of age, sex, disability, gender reassignment, marital status, pregnancy and maternity, race, religion or belief and sexual orientation.

Sexual harassment is one of the common workplace harassments that occurs when any person makes unwelcome sexual advances, or unwelcome requests for sexual favours, to another person; or engages in other unwelcome conduct of a sexual nature in relation to that other person; in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated that other person would be offended, humiliated or intimidated; or any person, either alone or together with other persons, engages in a conduct of a sexual nature which creates a hostile or intimidating environment for another person.

Examples of sexual harassment include

- Repeated attempts to make a date, despite being told "NO" each time
- Comments with sexual innuendoes and suggestive or insulting sounds
- Relentless humour and jokes about sex or gender in general
- Sexual propositions or other pressure for sex
- Implied or overt threats for sex
- Obscene gestures or inappropriate touching (e.g. patting, touching, kissing or pinching)
- Persistent phone calls or letters asking for a personal sexual relationship
- Displaying sexually obscene or suggestive photographs or literature
- Sexual assault or forced sexual intercourse (rape)

If you are the subject of harassment/bullying, you should say no firmly and clearly and tell the harasser to stop. Meanwhile, you can immediately talk and report to the Human Resources Department and your line manager or escalate to Group Human Resources. If you witness the inappropriate behaviours or comments relating to harassment and bullying, you are encouraged to report the matter to the Human Resources Department. ❖

Safeguarding & Child Protection

The Group recognises our shared responsibility for child safeguarding which is our cornerstone for pursuing “educational excellence for life and leadership”.

It is our primary responsibility to ensure that children and young people never experience abuse of any kind. We all have a responsibility to promote the welfare of all children and young people and to keep them safe. We are committed to seeking ways to continually review our practice such that each of our schools protects children as top priority and provides the conditions for humans to flourish.

We recognise and believe in the following core values of safeguarding and child protection:

- the wellbeing of students and employees is more important than all other considerations in school;
- all children regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse;
- some children are more vulnerable because of the impact of previous experiences, special educational needs, having a higher level of dependency, communication difficulties or other issues;
- working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people’s welfare.

Any violations of this policy will be treated as a serious infraction and will result in disciplinary action, up to and including termination of employment. ❖

Committing to Human Rights, The Environment and The Community

Reinforce Human Rights

We respect the Universal Declaration of Human Rights, as set out by the United Nations in 1948 and are committed to protect human rights within the Group’s sphere of influence.

We do not tolerate any and all forms of human right abuse, exploitation of any kind including child labour, slavery and human trafficking.

We are committed to acting ethically and with integrity in all our business relationships and the Anti-Slavery and Human Trafficking Statement is the source document for the enforcement of effective systems and controls to ensure child labor, slavery and human trafficking is not taking place in our schools or supply chains. This statement is made pursuant to Section 54 part 6 of the Modern Slavery Act 2015 (of the United Kingdom) and sets out the steps we are taking to ensure that slavery and human trafficking are not taking place in our schools, our supply chains, or in any part of the Group. ❖



Care for the Environment and the Community

The Group is committed to acting with respect and participation to preserve and protect the environment. We act responsibly, consider the wider implications of our actions, and strive to see our lives having a positive impact on the world. We mitigate any adverse environment impact and thrive to conduct business in a strategic and sustainable way.

We manage group-wide environmental sustainability and biodiversity projects which is to deliver more cost-efficient institutions that meets our environmental responsibilities and demonstrate control of environmental and social impacts.

We are committed to educating our employees and students with the importance of sustainability and global citizenship. We respect our local communities where we operate. We empower students and our employees to make a difference in the local environment and community, creating caring local and global citizens. ❖

Demonstrate

Work Ethics, Fairness and Accountability

Avoiding Conflicts of Interest

You should act in the best interest of the Group. This means you must never allow your personal interests to influence your actions on behalf of the Group. It is not possible to list every situation that could present a potential conflict, but you should familiarise yourself with the risks associated with the activities list below. Potential conflicts may arise in a variety of ways including but not limited to:

1) Personal investments and opportunities

- Personal investment involving the Group's suppliers, customers, competitors, or other business partners, or students, parents or employees of the Group's family schools would be a conflict as this would take an opportunity for personal gain that you may encounter through your position in the Group. If there is an investment opportunity, you are expected to declare this potential investment and seek approval from the Head of School or the Excom of the Group.

2) Concurrent employment

- Having a second job and consulting opportunity would be a potential conflict as it may interfere with your ability and engagement to perform your job with the Group, as well as a potential risk of divulging the proprietary information of the Group.
- The Group does not allow employees to have concurrent employment with any organisations or engage in any consulting role unless this has been specifically authorised.

3) Outside speech or presentation

- You may be asked to speak at conferences and make presentations because you are the Group's employees or because of your expertise arising from your job responsibilities. It would be a potential conflict if you are offered payment in connection with this.
- You are expected to seek approval from your line manager prior to any commitment to any outside speech or presentations.



4) Published articles

- When writing articles to be published, you should make sure that you do so as an individual and in any case should avoid embarrassing situations for the Group. Where the Group name is mentioned, prior approval from the Group is required.

5) Serving other organisations

- Accepting a role as director, advisory member or officer for another organisation may interfere with your obligations owing to the Group and create a conflict of interest.
- You are expected to declare this potential appointment and seek approval from the Excom of the Group.

6) Personal and business relationships

- Conducting business with any competitor, supplier, or other company where you, your family members, relatives, friends have a significant personal connection or financial interest will create a conflict of interest. You are expected to declare this potential conflict of interest and seek approval from the Head of School or the Excom of the Group, as the case may be.
- Hiring, promoting, directly supervising a relative would be a potential conflict of interest. You should notify Group HR as soon as practicable of such relationships and seek its approval on each course of HR action on the employee in relationship with you if you are the final approver in the operations.
- Granting or guaranteeing a loan to or accepting a loan from or through the assistance of, any individual organisation having business dealings with the Group or any member of the School's community would create a perceived or actual conflict of interest. To avoid conflict of interest, you should not be involved in any loan arrangement with any such organisation having business dealings with the Group or any member of the School's community.

7) Exchange of gifts and business hospitality

- Exchange of gifts and business hospitality may be common business practices; however, such activity can be misinterpreted or suggest the appearance of something improper, even when there is no improper intent.
- You must not accept any entertainment, gift, money, sumptuous meals from parents of any prospective or enrolled students.
- You must avoid conflict of interest situations, actual or potential, which may compromise your integrity and put the Group's interests or reputation at stake.
- You must decline entertainment, gifts, or other benefits that could in any way influence, or appear to influence, business decisions in favour of any person or organisation with whom the Group may have business dealings.
- You must also decline to accept advantages offered in connection with business transactions unless the advantages are of nominal and non-cash value, such as promotional or advertising souvenirs. Anyone who receives or is offered a gift must adhere to the following procedure:
 - You should report to your line manager and the Director of Finance to seek approval on receipt of any gifts and benefits with the assessed value above HK\$500/GBP50/RMB400. Employees at Head Office should report to the functional department head.
 - If the assessed value is between HK\$2,000/GBP200/RMB1,600 to HK\$5,000/GBP500/RMB4,000, you should submit the designated reporting form and seek the approval from the Head of School, the Chinese Principal and the Director of Finance. Employees at Head Office should report to the Chief Financial Officer.
 - If the assessed value is more than HK\$5,000/GBP500/RMB4,000, you should report to the Chief Education Officer and seek his approval. Employees at Head Office should report to the Chief Executive Officer.
- If an employee fails to report the receipt/offer of any gift/benefit from any person/organisation with business dealings with the Group in accordance with the Code (or any applicable law or the Group's policy in force from time to time), he/she may result in a disciplinary action up to and including termination of employment.
- You must avoid offering gifts to specific individuals; instead, gifts may be offered to the company for which such individuals work for on occasions when it is appropriate, out of courtesy and to maintain business relationship. Corporate souvenirs are preferred. Gifts must not be in the form of cash.
- For entertainment, company functions are preferred over entertaining individuals. In both cases, these entertainments must be offered only in connection with legitimate business interests and purposes. You must decline to accept and refrain from issuing invitations to meals or entertainment that are excessive in monetary value or too frequent. Proper use of budget, approval, record-keeping and documentation procedures must be made when expensing business gifts and entertainment.
- You are also under an obligation to ensure agents or others providing gifts or entertainment on the Group's behalf to follow our guidelines. When dealing with organisations or government/public sector corporations that have more restrictive limits or prohibitions against accepting business gifts and entertainment, you must abide by their standards.



8) Gambling

- You should not engage in gambling of any kind, including mahjong games, with persons having business dealings with any members of the Group. In social games when there is no conflict or potential conflict of interest, you should exercise your judgement not to bring the Group into disrepute and should avoid any high stake games.

9) Use of the Group's Assets

- You are prohibited from using the Group's monies, facilities, equipment, know-how or personnel for any other business or personal endeavours.

Please use your good judgement and ask for assistance wherever you are uncertain about the proper course of action. You are expected to address and avoid conflicts and to build honest business relationships, promote fairness and integrity in the marketplace. You should escalate perceived and actual conflicts of interest as soon as these conflicts arise so that proper review can be conducted and required steps can be taken to help mitigate such conflicts. ❖

Making Political Contributions and Taking Part in Political Activities

Employees should not make any political contributions on behalf or in the name of the Group. The Group respects your right to participate in political activities or making political contributions in your personal capacity, provided you do so in accordance with applicable laws and regulations and it does not create a conflict of interest with your duties in the Group. You should not promote personal political views during performance of your duties or out of your capacity as an employee of the Group, to colleagues, suppliers, contractors, parents, students, customers, media in any form, or anyone else with whom the Group may have business dealings. You should not use the Group's premises, assets or resources in connection with the promotion of your personal political views or activities. ❖

Maintaining Transparency to Deal with Suppliers and Third Parties

All purchases of goods and services must be done in an open and competitive environment to ensure that the prices that the Group pays are fair and reasonable. All purchases should abide by the Group's procurement policy to ensure transparency, fairness, and proper internal control.

You should not accept any gifts, money, vouchers, tickets to events, trips, sumptuous meals etc. from suppliers, particularly potential suppliers. However, it should be noted that the offer of small gifts or hospitality is an accepted part of commercial life and thus care must be taken not to offend or damage relationships when explaining that acceptance is contrary to the Group's policy when you are refusing such gifts or hospitality. Any attempts by suppliers to undermine the honesty of employees by the offer of gifts or any other inducements should be immediately reported to your line manager. ❖

Conducting Business without Bribery, Corruption or Fraud

We are committed to abiding by all laws and regulations or if necessary to exceeding them, to preventing bribery whenever we do business. We must adhere to anti-bribery and anti-corruption laws where we do business and regardless of what local laws may permit.

You never offer, pay, promise to pay, or accept anything of value either directly or indirectly to improperly influence the judgement or actions of others.

Bribes come in many forms, and they are not always obvious. A gift, the promise of a job opportunity, the offer of a trip, a charitable contribution – all could be considered bribes, if offered in exchange for any decision or favourable treatment.

If you are not sure of what to do before you offer or accept anything of value, please check the related policies and ask for assistance from your line manager and the Human Resources Department.

Fraud is wrongful or criminal deception intended to result in financial or personal gain and which may result in loss to the Group or another party. Examples of fraudulent activities include false statements, falsification of records or expenses claims, the misuse of company information or theft. These actions may all constitute fraud, which is not only grounds for dismissal, but in some cases, criminal charges. ❖



Protecting our Confidential Data, Personal Information, Intellectual Property and Assets

You have an obligation to manage and protect the Group's data, information and assets. This applies before, during and after employment.

You must safeguard the confidentiality of business or other sensitive information and the integrity of our business and operational records. You must also protect from misuse of business information or assets held by us on behalf of students, parents, partners and shareholders. In general, matters not publicised or released to the public domain by the Group may be sensitive and we should treat this information with reasonable care and security. This would include business dealings, project information and analyses, financial arrangements, transactions or account information in connection with its suppliers, students, parents or shareholders and any computer system of the Group or its Schools.

Information created or acquired by employees while performing their duties is the property of the Group which includes but is not limited to:

- Personal data and salaries of employees
- Student, parent, and other customers' data
- Trade secrets, strategies, budgets, forecasts and profits
- Group policies and procedures, guidelines, business process and systems
- Intellectual property and know-how
- Project details, terms and partners' information

You may work with personal information (including sensitive personal information) as part of your jobs. Personal information includes information about anyone such as:

- Name
- Passport or identification card or visa details
- Age & gender

Demonstrate Work Ethic, Fairness and Accountability

- Date of birth
- Nationality
- Address including personal or business email address
- Telephone number,
- Education and employment background,
- Medical information and dietary restrictions
- Details of family members and referees
- Credit card information & financial information
- Medical information
- A combination of certain information such as habits and demographics of students, customers and employees

You must guard this information well by the Group's policies regarding the access, transfer and use of this information. You collect personal information for legitimate business reasons, and only use it for the purposes of its collection. Access to limited amount of personal information is granted for doing our job. You only share the data on a need-to-know- basis with authorised people who also need them for completing their work. You should never share it with any unauthorised person outside of our Group or anyone in the Group who does not require use of such information to complete your job.

Intellectual property is the Group's property which is under the ownership of the Group. Intellectual property includes our logos, trademarks or patents, confidential/proprietary information such as marketing and sales strategies, education programs, our bespoke curriculum and pedagogy. You should safeguard the Group's intellectual property from unauthorised use and must protect the Group's intellectual property rights in accordance with the relevant Group requirements as well as the applicable laws and regulations. ❖

Competing Fairly Locally and Globally

The Group competes fairly and within legal boundaries. We respect everyone's benefits from a competitive marketplace and we are committed to acting in full compliance with the antitrust and fair competition laws in all locations where we operate and avoid even the appearance of unfairly restricting another company's ability to compete against us.

You never enter into any agreement and understanding formally or informally with a competitor (or competitors) to interfere the entry or participation of other companies in the marketplace; manipulate tuition fees or other prices on our product and services; boycott another company which is either a customer, competitor or supplier.

You are prohibited from disclosing any information with competitors about topics such as pricing, costs, terms or conditions of business dealings, compensation and benefits of employees, market segments, clients or marketing strategies, project partners' information. If you are invited to the discussion on a competitively sensitive subject over the phone, at meetings, conferences, recruitment fairs or trade shows, you should stop the conversation and remove yourself from the situation and immediately report the incident to Group Legal.

You should use public or other legitimate sources to collect competitive intelligence and should not gather or ask someone else to gather information using any illegal or illicit activity. If you are not sure about the right way to gather information about the competitors, you should consult with Group Legal. ❖

Maintain

Good Business Practices

Protecting our Brand & Reputation

We are committed to protecting our brand and handling anything that may impact our brand and reputation with care and precision.

You must be mindful of any action and decision which you may perform as part of your role that may cause a significant impact on our brand and reputation. This may include:

- Our behaviour in front of students, parents, suppliers, business partners, government officials, fellow employees including dress code, attentiveness, gesture, language and tone of voice.
- Use of our logos, the Harrow name, badges and arms, the Group name and corporate branding in emails, marketing materials and any documents which will appear in public.

It is your responsibility to track, monitor and report on appropriate brand usage. You must ensure that AISL and the brands operated by AISL including all Harrow International, Harrow LiDe Schools, and Harrow Little Lions, AISL Academy, AISL Outdoor and AISL Mall (across all forms of media) are used appropriately and that breaches of the Brand Guidelines are immediately addressed and, where necessary, reported to Group Marketing and Group Legal. ❖

Following Health, Safety & Security Standards

We are committed to taking all reasonably practicable measures within our power to ensure that the working locations are safe and risks to health and safety of the employees, students, contractors and members of the public are minimised.

We should take reasonable care of our employees' health and safety and that of others who may be affected by their legal acts or omissions and must co-operate with their employers on health and safety matters.

Every employee should familiarise themselves with the local Health and Safety Policy and other safety legislation and code of practices which are relevant to the work of the department in which the employees work.

Both physical and mental health of our employees is of utmost importance to the Group. Employees should consult with their Human Resources Department about the available resources relating to first aid, medical care program, counselling service and seek professional health care advice and support if needed.

Alcohol or drug abuse can impair and affect health and job performance. It is also hazardous to our workplace safety, employees' well-being and productivity. Therefore, we must ensure that our workplace is free of any alcohol and drug or related problems.



We are committed to providing a smoking-free work environment. Smoking is hazardous to employee's health and secondhand smoke poses a health risk to other employees at the workplace or members of the school community. Therefore, smoking is completely prohibited at our workplace regardless of what local laws may permit. ❖

Managing Cyberspace, Social Media & Networking

The Group, its subsidiaries, schools, educational institutions, and centers within the Group recognises the importance and benefits of communicating through social media.

When using social media, you are conscious at all times of the need to keep your personal and professional life separate. You should not put yourself in a position where there is a conflict between your work and your personal interests. You must be accurate, fair and transparent when creating or altering online sources of information on behalf of the Group/School. You should respect the intellectual property and personal information, and hence we should not disclose any internal communication, policies, plans, personal information of employees, students, parents, suppliers, business partners, etc on social media.

You should protect the branding and reputation of the Group. You should not make disparaging comments about your work or discuss online operational matters, or post photos or videos related to work when you use your personal social networks. You should report any misleading or false company information to the related departments.

Email usage is restrictive for the business-use only. The internet and email systems are provided to you as tools to carry out your employment duties. All messages created, sent or retrieved using the Group's internet and email facilities remain the property of the Group and cannot be considered private. You should inform the ICT Department if you receive any phishing, scam and other suspicious emails which may be fraudulent and pose any privacy or security risk to the Group.

You have the responsibility to protect company data confidentiality and safeguard personal data. Therefore, you should not share login or passwords with anyone and should not use untrustworthy Wi-Fi sources to access any networks and systems of the Group. ❖

Respond, Comply, Report

Respond

Laws and regulations can vary widely from country to country. Our Group is based in Hong Kong SAR. Our employees across territories and regions are often subject to Hong Kong law in addition to the laws of the country where our employees work. Employees are expected to be familiar with the laws and regulations related to their jobs in the country (or countries) where we operate. If local customs or practices conflict with our Code or law, employees should follow the law and our Code, or contact Group Legal for guidance.

Our Code is not intended to be a comprehensive manual and not every difficult situation that our employees may encounter is herein covered. We expect employees to always exercise personal integrity and good judgement when dealing with different situations. Employees have the rights to speak up when something does not look right. Likewise, we expect our employees to speak up even though they are not involved in the situation. ❖

Comply

When employees fail to follow our Code or applicable laws, neglect others' failure to follow the Code, solicit or cause others to violate the Code, fail to report a breach, or attempt to retaliate against the employee who reports a suspected breach, they may be subject to disciplinary action that matches the nature or severity of the violation, up to and including:

- Suspension
- Written warning
- Termination of employment or summary dismissal

If an act violates the law, the Group reserves the right to report to the law enforcement agencies and this could result in criminal prosecution. Code violations will be documented in the employment record.

The Group has other policies and procedures for managing performance, conduct and behaviour. Policy violations that are not Code violations will be handled under the relevant policy or procedures. ❖



Report

You should follow the following escalation procedures to report any violation of our Code:

- You report to your line manager/head of school and the Human Resources of your operations in person, by mail, by phone or through email.
- Line managers, heads of school or assigned representatives are required to submit an incident report to Group Human Resources and Group Legal within 24 hours
- For serious breaches of our Code, Group Human Resources and Group Legal report to Excom of the Group.

You are expected to keep the report matter confidential. If you are concerned about the involvement of anyone in your operation, you can directly report to Group Human Resources or Group Legal. The local management team, Group Human Resources and Group Legal will investigate the allegation in strictest confidentiality and are expected to communicate properly with the employee who makes the report.

All reports will be treated confidentially. Any personal details of the concerned employees will only be shared where it is necessary to address the concerns raised or required by law or for internal investigation. If the report is anonymous, the Group and recipient of the report will not commit to provide feedback. We encourage employees to disclose their identity to report any breaches of the Code as an anonymous report will require extended time to assess and validate the reported allegations. ❖

Addendum to the Code of Conduct

General Note to Addendum: This addendum forms an integral part of the Code of Conduct. The Group's policies (including codes of practices, management controls) are too numerous to list. The Group's policies are highlighted below for ease of reference. Meanwhile, please refer to the AISL Portal for additional policies, procedures, handbooks, manuals, and guidelines which must also be complied with as required by the Code.

Code of Conduct Section Reference Policies, Procedures, Codes & Guidelines

<i>Care about our Employees, Parents, Students and Communities</i>	Promoting a Positive, Respectful and Caring Workplace	Drugs, Alcohol and Smoking Policy (Employee)
	Respecting Equal Opportunities	Equal Opportunities, Equality and Diversity Policy
	Embracing Diversity and Inclusion	Equal Opportunities, Equality and Diversity Policy
	Addressing Sexual Harassment and Bullying	Prevention of Bullying Policy
	Safeguarding & Child Protection	Safeguarding & Child Protection Policy Intimate Care Policy
	Committing to Human Rights, The Environment and The Community	Sustainability And Biodiversity Slavery & Human Trafficking Statement

<i>Demonstrate Work Ethic, Fairness and Accountability</i>	Avoiding Conflicts of Interest	
	Conducting Business without Bribery, Corruption and Fraud	Anti-Bribery & Gifts
	Maintaining Transparency to Deal with Suppliers and Third Parties	Procurement Procedures
	Protecting our Confidential Data, Personal Information, Intellectual Property and Assets	Group Policy on Data Protection Data Access & Protection Policies
	Competing Fairly Locally and Globally	

<i>Maintain Good Business Practices</i>	Protecting our Brand & Reputation	Brand Protection Policy
	Following Health, Safety & Security Standards	Mental Health Policy and Counselling Procedures Medical Policy and Procedures Health and Safety Policy Campus Access & Security Policy Catering & Food Provision Crisis Management (incl. Lockdown) Procedures Premises & Facilities Management Policy Transportation Policies & Procedures
	Managing Cyberspace, Social Media & Networking	Group Media Policy





十年树木 百年树人
Inspiring Future Generations