

I. Purpose

Ambrosia Holdings is committed to maintaining the highest standards of ethics, integrity, and corporate governance. This Business Code aligns with the principles outlined in the **UK Corporate Governance Code 2018**, ensuring accountability, transparency, and fairness across all operations. By adhering to these standards, we aim to foster sustainable growth, safeguard stakeholder interests, and maintain a reputation of excellence. As a company incorporated under the laws of Hong Kong, our policies comply with applicable local regulations while respecting EU laws where relevant.

II. Corporate Governance

1. Compliance with Laws and Regulations

- All business activities must adhere to Hong Kong laws and regulations, as well as EU laws when operating within EU jurisdictions.
- Employees and business units must understand and apply these legal requirements in their respective roles.

2. Transparency and Accountability

- Maintain clear, accurate records and ensure transparency in financial reporting.
- Decision-making processes must be documented and auditable.

3. Risk Management

- Identify, monitor, and mitigate risks, with a particular focus on legal compliance, cybersecurity, and supply chain vulnerabilities.

III. Ethical Conduct

1. Integrity and Honesty

- Employees and stakeholders must conduct themselves with integrity in all business dealings.
- Ambrosia Holdings enforces a zero-tolerance policy on bribery, corruption, and fraudulent activities.

2. Conflicts of Interest

- Disclose any potential or actual conflicts of interest promptly.
- Avoid personal gain at the expense of company interests.

3. Fair Competition

- Compete ethically and comply with antitrust and competition laws in all operating regions.

IV. Respect for Human Rights

1. Equal Opportunity and Diversity

- Promote a workplace that values diversity and inclusivity.

- Prohibit discrimination, harassment, and unequal treatment based on race, gender, age, sexual orientation or other protected characteristics.
- 2. **Safe Working Environment**
 - Provide safe and healthy workplaces.
 - Regularly review and improve health and safety protocols.

V. Environmental Sustainability

1. **Environmental Compliance**
 - Operate in accordance with Hong Kong's environmental laws and applicable EU regulations.
 - Implement sustainable practices to minimize environmental impact.
2. **Resource Efficiency**
 - Reduce waste and optimize energy and resource use in operations.

VI. Community Engagement

1. **Corporate Social Responsibility (CSR)**
 - Support community development through responsible business practices and partnerships.
 - Encourage employee involvement in CSR initiatives.

VII. Implementation and Enforcement

1. **Code Dissemination**
 - Ensure that all employees and stakeholders are aware of and trained on the Business Code.
2. **Monitoring and Reporting**
 - Regularly monitor compliance through audits and evaluations.
 - Provide secure channels for reporting violations, ensuring whistleblower protections.
3. **Corrective Actions**
 - Address non-compliance with corrective action plans.
 - Repeated or severe violations may result in disciplinary actions, including termination or legal proceedings.

VIII. Updates to the Code

This Code is reviewed annually to ensure compliance with evolving laws and business practices. Updates will be communicated to all employees and stakeholders promptly.

Ambrosia Holdings

Administration