



SEVEN YIELD HOLDING PTE. LTD.

Dealing Policy

1 INTRODUCTION

- 1.1 This policy applies to all directors and employees of Seven Yield Holding Pte. Ltd. (the "**Company**") and its subsidiaries (the "**Group**"). This policy is adopted effective 13 June 2019.
- 1.2 It has been designed to ensure that you do not misuse, or place yourself under suspicion of misusing, information about the Group which you have, and which is not public.

2 OBLIGATIONS

- 2.1 You must not deal in any securities of the Group if you are in possession of inside information about the Group. You must also not recommend or encourage someone else to deal in the Group's securities at that time – even if you will not profit from such dealing.
- 2.2 You must not disclose any confidential information about the Group (including any inside information) except where you are required to do so as part of your employment or duties. This means that you must not share the Group's confidential information with family, friends or business acquaintances.
- 2.3 You may, from time to time, be given access to inside information about another group of companies (for example, one of the Group's customers or suppliers). You must not deal in the securities of that group of companies at those times.

3 DEALING CODE

- 3.1 The Group also operates a Dealing Code which applies to the Company's directors and to employees who are able to access restricted information about the Group (for example, employees who are involved in the preparation of the Group's financial reports and those working on other sensitive matters). You will be told if you are required to comply with the Dealing Code. Directors and employees who are required to comply with the Dealing Code must also comply with this policy.

4 POTENTIAL PENALTIES

- 4.1 Failure to comply with this policy may result in internal disciplinary action. It may also mean that you have committed a civil and/or criminal offence.
- 4.2 If you have any questions about this policy, or if you are not sure whether you can deal in securities at any particular time, please contact the Group Compliance Officer.

5 REVIEW AND ONGOING MONITORING

- 5.1 This policy will be monitored and reviewed and may be subject to change as and when a need is identified, or if required by legislation.