



WATTA GROUP OF COMPANIES

Whistle-Blowing Policy & Code of Ethics and Conduct

(A) WHISTLE-BLOWING POLICY

All employees and public are encouraged to raise genuine concerns about possible improprieties in matters of financial reporting, compliance and other malpractices at the earliest opportunity and in an appropriate way.

This policy is designed to:

- Support the company's values;
- Ensure employees can raise concerns without fear of reprisals; and
- Provide a transparent and confidential process for dealing with concerns.

This policy not only covers possible improprieties in matters of financial reporting, but also:

- Fraud;
- Corruption, bribery or blackmail;
- Criminal offences;
- Failure to comply with a legal or regulatory obligation;
- Miscarriage of justice;
- Endangerment of an individual's health and safety; and
- Concealment of any or a combination of the above.

(B) CODE OF ETHICS AND CONDUCT

The Watta Group is in the business of marketing and distributing automobile batteries and related products and servicing of mobile telecommunications products; has a responsibility to safeguard its integrity and credibility. It is on this understanding that the organization sets out clear code of ethics and conduct for its staff. The code stipulates the sound principles that will guide the Watta Group staff in discharging their duties. It sets out the good standards of practice.

The purpose of the code is to:

1. Uphold the good name of Watta Group and to maintain public confidence in the use of Watta products.
2. Maintain an impartial and unbiased relationship between the Watta Group and its dealers/agents.
3. Uphold the high standards of personal integrity and professionalism of the Watta Group of staff.

The code stipulates that staff should not:

1. Engage directly or indirectly in any business activity that competes or is in conflict with the Watta Group interest.
2. Misuse or abuse their positions in the Group for their personal benefit or for the benefit of other persons.
3. Misuse information. Staff should not copy, remove or make use of any information obtained in the course of business for the direct or indirect benefit of themselves or of any other persons.

In addition to these, staff should:

1. Ensure the integrity and accuracy of records and/or transactions.
2. Ensure fair and equitable treatment in all business dealings on behalf of the Watta Group.
3. Maintain the highest standard of service in their relationship with customers.
4. Maintain confidentiality of all relations and dealings between the Group and its customers prior written consent of the customer.
5. Observe and comply with regulations relating to the operations of the Watta Group.