

## Prohibition of Bribery and Corruption Policy

<b>Entity:</b> BPTP INTERNATIONAL TRADE CENTRE LIMITED	<b>Section:</b> GOVERNANCE POLICY	<b>Version:</b> V2	<b>Effective Date:</b> 01.07.2023
<b>Subject:</b> PROHIBITION OF BRIBERY & CORRUPTION			
<b>Policy Owner:</b> CHRO	<b>Review Date:</b> 01.07.2024	<b>Pages:</b> 1	

**APPLICABILITY:** It applies to all projects, including both new construction and existing buildings at BPTP INTERNATIONAL TRADE CENTRE LIMITED

**PURPOSE:** The purpose of a child labor policy, is to maintain ethical standards, fosters transparency, and ensures compliance with legal requirements. It emphasizes the importance of maintaining integrity, ethical behavior, and compliance with all applicable laws and regulations. By implementing this policy, BPTP can contribute to a more ethical and sustainable approach to construction while setting a positive example for the industry. This clearly states the potential disciplinary actions, which may include termination, legal action, or other appropriate measures.

**POLICY OUTLINE:** Bribery refers to the offering, giving, receiving, or soliciting of anything of value to influence the action of an official or other person in a position of trust while Corruption refers to any form of dishonest or unethical conduct, including bribery and other fraudulent activities. Child labor is a serious act and individuals must not offer or accept gifts or hospitality that could compromise or appear to compromise a company's objectivity in business transactions.

To support this policy, BPTP will:

- Conduct due diligence on third parties, such as contractors, suppliers, and business partners, to ensure they adhere to similar anti-bribery and corruption standards.
- Encourages the reporting of any suspected or observed violations of this policy through a confidential reporting mechanism.
- Thoroughly investigate if any violations have been done, and appropriate disciplinary actions will be taken, which may include termination, legal action, or other measures.
- Regular training sessions will be conducted to educate employees about this policy, applicable laws, and the importance of ethical conduct.
- Maintain appropriate records of transactions and approvals to ensure transparency and accountability.

**RESPONSIBILITY:** All individuals associated with BPTP must comply with all applicable anti-bribery and corruption laws and regulations.

**AMENDMENTS:** This policy is subject to any changes in the applicable laws, rules and regulations by the management.

For BPTP International Trade Centre Limited  
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## Cybersecurity Policy

<b>Entity:</b> BPTP INTERNATIONAL TRADE CENTRE LIMITED	<b>Section:</b> GOVERNANCE POLICY	<b>Version:</b> V2	<b>Effective Date:</b> 01.07.2023
<b>Subject:</b> CYBERSECURITY POLICY			
<b>Policy Owner:</b> CHRO	<b>Review Date:</b> 01.07.2024	<b>Pages:</b> 1	

**APPLICABILITY:** It applies to all projects, including both new construction and existing buildings at BPTP INTERNATIONAL TRADE CENTRE LIMITED.

**PURPOSE:** The purpose of a cybersecurity policy for BPTP Limited is to protect an organization's digital assets, sensitive information, and ensure the integrity of its operations. It articulates the organization's commitment to maintaining the confidentiality, integrity, and availability of information and systems.

**POLICY OUTLINE:** This policy outlines the principles and guidelines for ensuring the confidentiality, integrity, and availability of our information and information systems. It also aims to create a secure and resilient digital environment, safeguarding both our assets and the trust of our clients and stakeholders.

To support this policy, BPTP will:

- Committed to complying with all relevant laws and regulations concerning cybersecurity and data protection.
- Establish a designated individual or team responsible for overseeing cybersecurity initiatives.
- Implement strong access controls, including user authentication and authorization mechanisms.
- Enforce the principle of least privilege to limit access to necessary resources.
- Deploy firewalls and intrusion detection/prevention systems to secure our network infrastructure.
- Regularly update and patch network devices and software.
- Secure end-user devices with antivirus software, encryption, and regular software updates.
- Implement a mobile device management (MDM) solution for company-owned mobile devices.
- Define guidelines for handling, storing, and transmitting sensitive data.
- Encrypt sensitive information both in transit and at rest.
- Develop and maintain an incident response plan that outlines steps to be taken in case of a cybersecurity incident.
- Conduct regular cybersecurity awareness training for all employees to educate them about potential threats and best practices.
- Secure physical access to data centres, server rooms, and other critical infrastructure.
- Conduct regular cybersecurity audits and assessments to identify vulnerabilities and ensure the effectiveness of security controls.

**RESPONSIBILITY:** All individuals associated with BPTP namely, contractors, employees, suppliers, third-party vendors, consultants and other stakeholders who have access to systems, data and network must comply with the rules and regulations of the BPTP.

**AMENDMENTS:** This policy is subject to any changes in the applicable laws, rules and regulations by the management.

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## Data Protection and Privacy Policy

<b>Entity:</b> BPTP INTERNATIONAL TRADE CENTRE LIMITED	<b>Section:</b> GOVERNANCE POLICY	<b>Version:</b> V2	<b>Effective Date:</b> 01.07.2023
<b>Subject:</b> DATA PROTECTION AND PRIVACY			
<b>Policy Owner:</b> CHRO	<b>Review Date:</b> 01.07.2024	<b>Pages:</b> 1	

**APPLICABILITY:** It applies to all projects, including both new construction and existing buildings at BPTP INTERNATIONAL TRADE CENTRE LIMITED

**PURPOSE:** The purpose of a Data Protection and Privacy policy, is to protect the privacy and security of personal information collected and processed during our operations. This policy outlines our commitment to complying with data protection laws and maintaining the confidentiality, integrity, and availability of personal data. By implementing this policy, BPTP is committed to complying with all applicable data protection laws.

**POLICY OUTLINE:** Data protection and privacy are critical components for a company to ensure the responsible and ethical handling of personal information. It involves respecting individuals' right to privacy and ensuring that their personal information is handled with care and confidentiality.

To support this policy, BPTP will:

- Implement appropriate technical and organizational measures to safeguard personal data.
- Protect personal data against unauthorized access, disclosure, alteration, and destruction.
- Develop and maintain a data breach response plan.
- Provide regular training to employees on data protection policies and procedure s.
- Conduct privacy impact assessments for new projects, systems, or processes that involve the processing of personal data.
- Regular review and update new laws, technologies, and organizational needs.

**RESPONSIBILITY:** All individuals, employees, contractors, suppliers, consultant and other stakeholders associated with BPTP must comply with all applicable data protection and privacy laws and regulations.

**AMENDMENTS:** This policy is subject to any changes in the applicable laws, rules and regulations by the management.

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## Executive Compensation Policy

<b>Entity:</b> BPTP INTERNATIONAL TRADE CENTRE LIMITED	<b>Section:</b> GOVERNANCE POLICY	<b>Version:</b> V2	<b>Effective Date:</b> 01.07.2023
<b>Subject:</b> EXECUTIVE COMPENSATION			
<b>Policy Owner:</b> CHRO	<b>Review Date:</b> 01.07.2024	<b>Pages:</b> 1	

**APPLICABILITY:** It applies to all projects, including both new construction and existing buildings at BPTP INTERNATIONAL TRADE CENTRE LIMITED

**PURPOSE:** The purpose of the Executive Compensation Policy is to establish a framework for determining fair, competitive, and performance-driven compensation for our executives at BPTP. This policy is designed to attract, retain, and motivate top talent while aligning executive interests with the long-term success of the company.

**POLICY OUTLINE:** Executive compensation refers to the financial rewards, benefits, and incentives provided to high-ranking executives within a company. This compensation is designed to attract, retain, and motivate top-level talent while aligning their interests with the long-term success of the organization. The performance metrics for executive compensation will be tied to BPTP's strategic objectives, financial performance, operational excellence, and other key performance indicators relevant to the company.

To support this policy, BPTP will:

- Regularly benchmarked against industry peers and relevant market data to ensure competitiveness and alignment with industry standards.
- Committed to transparency in executive compensation. Relevant details, including the components of compensation, performance metrics, and the rationale behind compensation decisions, will be communicated to shareholders and other stakeholders as required by law.
- Implement clawback provisions to recoup executive compensation in the event of financial restatements, misconduct, or other circumstances as determined by the Board.
- Regularly review to ensure its ongoing alignment with [Your Real Estate Company Name]'s goals, industry standards, and regulatory requirements.
- Establish limits on executive compensation to ensure it remains reasonable and justifiable in the context of overall company performance and shareholder interests.

**RESPONSIBILITY:** The Compensation Committee of the Board of Directors is responsible for reviewing and approving executive compensation.

**AMENDMENTS:** This policy is subject to any changes in the applicable laws, rules and regulations by the management.

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## Fiduciary Duty Policy

<b>Entity:</b> BPTP INTERNATIONAL TRADE CENTRE LIMITED	<b>Section:</b> GOVERNANCE POLICY	<b>Version:</b> V2	<b>Effective Date:</b> 01.07.2023
<b>Subject:</b> FIDUCIARY DUTY			
<b>Policy Owner:</b> CHRO	<b>Review Date:</b> 01.07.2024	<b>Pages:</b> 1	

**APPLICABILITY:** It applies to all projects, including both new construction and existing buildings at BPTP INTERNATIONAL TRADE CENTRE LIMITED

**PURPOSE:** The purpose of this Fiduciary Duty Policy is to establish guidelines for all employees, agents, and representatives of BPTP in fulfilling their fiduciary duties towards clients, emphasizing integrity, transparency, and the highest ethical standards in all project transactions.

**POLICY OUTLINE:** Fiduciary duty refers to a legal and ethical obligation that requires an individual or entity, known as a fiduciary, to act in the best interests of another party, known as the beneficiary or client. The fiduciary duty is characterized by trust, confidence, and reliance on the fiduciary to make decisions and take actions that prioritize the well-being of the beneficiary.

To support this policy, BPTP will:

- Comply to applicable real estate laws, regulations, industry standards and stay informed about changes in laws and regulations and take necessary steps to ensure compliance.
- Maintain accurate and complete records of all transactions, communications, and agreements with clients.
- Safeguard client information and maintain strict confidentiality regarding client affairs, unless disclosure is required by law.
- Encourage employees to report any suspected violations of this fiduciary duty policy through established reporting channels without fear of retaliation.
- Provide ongoing training and education to ensure that all personnel are well-informed about fiduciary duties, ethical standards, and industry best practices.
- Take strict disciplinary action, including termination of employment or contractual relationships upon violation of this policy.

**RESPONSIBILITY:** All individuals associated with BPTP must comply with all applicable Fiduciary duty laws and regulations.

**AMENDMENTS:** This policy is subject to any changes in the applicable laws, rules and regulations by the management.

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## Fraud Policy

<b>Entity:</b> BPTP INTERNATIONAL TRADE CENTRE LIMITED	<b>Section:</b> GOVERNANCE POLICY	<b>Version:</b> V2	<b>Effective Date:</b> 01.07.2023
<b>Subject:</b> PROHIBITION OF FRAUDULENT ACTIVITIES			
<b>Policy Owner:</b> CHRO	<b>Review Date:</b> 01.07.2024	<b>Pages:</b> 1	

**APPLICABILITY:** It applies to all projects, including both new construction and existing buildings at BPTP INTERNATIONAL TRADE CENTRE LIMITED

**PURPOSE:** The purpose of a cybersecurity policy is to protect an organization's digital assets, sensitive information, and ensure the integrity of its operations. It articulates the organization's commitment to maintaining the confidentiality, integrity, and availability of information and systems.

**POLICY OUTLINE:** Fraud is defined as any intentional act or omission carried out to deceive others for personal or financial gain, causing harm to the company, its clients, or stakeholders. Fraudulent activities may include but are not limited to misrepresentation, embezzlement, bribery, corruption, forgery, and theft. This Fraud Policy outlines the company's stance on fraud prevention, detection, and response, emphasizing the importance of integrity and accountability among employees, contractors, and third parties.

To support this policy, BPTP will:

- Committed to complying with all relevant laws and regulations concerning cybersecurity and data protection.
- Establish a designated individual or team responsible for overseeing cybersecurity initiatives.
- Implement strong access controls, including user authentication and authorization mechanisms.
- Enforce the principle of least privilege to limit access to necessary resources.
- Deploy firewalls and intrusion detection/prevention systems to secure our network infrastructure.
- Regularly update and patch network devices and software.
- Secure end-user devices with antivirus software, encryption, and regular software updates.
- Implement a mobile device management (MDM) solution for company-owned mobile devices.
- Define guidelines for handling, storing, and transmitting sensitive data.
- Encrypt sensitive information both in transit and at rest.
- Develop and maintain an incident response plan that outlines steps to be taken in case of a cybersecurity incident.
- Conduct regular cybersecurity awareness training for all employees to educate them about potential threats and best practices.
- Secure physical access to data centres, server rooms, and other critical infrastructure.
- Conduct regular cybersecurity audits and assessments to identify vulnerabilities and ensure the effectiveness of security controls.

**RESPONSIBILITY:** All individuals associated with BPTP namely, contractors, employees, suppliers, third-party vendors, consultants and other stakeholders who have access to systems, data and network must comply with the rules and regulations of the BPTP.

**AMENDMENTS:** This policy is subject to any changes in the applicable laws, rules and regulations by the management.

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## Political Contribution Policy

<b>Entity:</b> BPTP INTERNATIONAL TRADE CENTRE LIMITED	<b>Section:</b> GOVERNANCE POLICY	<b>Version:</b> V2	<b>Effective Date:</b> 01.07.2023
<b>Subject:</b> POLITICAL CONTRIBUTION			
<b>Policy Owner:</b> CHRO	<b>Review Date:</b> 01.07.2024	<b>Pages:</b> 1	

**APPLICABILITY:** It applies to all projects, including both new construction and existing buildings at BPTP INTERNATIONAL TRADE CENTRE LIMITED

**PURPOSE:** The purpose of this Political Contribution Policy is to establish guidelines for political contributions and activities by BPTP and its employees. This policy aims to ensure transparency, compliance with applicable laws, and alignment with the company's values.

**POLICY OUTLINE:** Political contributions refer to donations of money, resources, or support made to political candidates, parties, or causes. Political contributions can come from individuals, corporations, labor unions, and other organizations. These contributions are often regulated by laws and regulations at various levels of government to ensure transparency, prevent corruption, and maintain the integrity of the political system. At BPTP, all contributions must be approved by the Board of Directors and should be consistent with the company's values and business interests.

To support this policy, BPTP will:

- Prohibits contributions to individuals or organizations that promote discrimination, hate speech, or illegal activities.
- Maintain transparency by disclosing its political contributions on an annual basis or as required by applicable regulations.
- Shall maintain neutrality concerning political candidates, parties, and ideologies.
- Provide education and guidance to employees regarding political contribution laws and the company's policy.

**RESPONSIBILITY:** All individuals associated with BPTP must comply with all applicable laws and regulations of political contribution. Violations of this policy may result in disciplinary action.

**AMENDMENTS:** This policy is subject to any changes in the applicable laws, rules and regulations by the management.

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## Shareholder Rights Policy

<b>Entity:</b> BPTP INTERNATIONAL TRADE CENTRE LIMITED	<b>Section:</b> GOVERNANCE POLICY	<b>Version:</b> V2	<b>Effective Date:</b> 01.07.2023
<b>Subject:</b> SHAREHOLDER RIGHTS			
<b>Policy Owner:</b> CHRO	<b>Review Date:</b> 01.07.2024	<b>Pages:</b> 1	

**APPLICABILITY:** It applies to all projects, including both new construction and existing buildings at BPTP INTERNATIONAL TRADE CENTRE LIMITED

**PURPOSE:** The purpose of this Shareholder Rights Policy is to ensure transparency, equitable treatment, and protection of the rights and interests of shareholders in BPTP INTERNATIONAL TRADE CENTRE LIMITED.

**POLICY OUTLINE:** Shareholder rights refer to the set of entitlements, privileges, and protections granted to individuals or entities that own shares or equity in a company. This policy aims to establish a framework for communication, transparency, and the protection of shareholder interests.

To support this policy, BPTP will:

- Communicate timely and regular updates to all the shareholders through various channels, including annual reports, shareholder meetings, and online platforms.
- Shared a comprehensive financial report to shareholders annually, thereby providing a clear overview of the company's financial performance.
- All shareholders, regardless of the size of their holdings, will be treated equally regarding voting rights.
- Equal access to relevant information, ensuring that no group of shareholders has preferential treatment in terms of information disclosure.
- Encourages an open and constructive dialogue with shareholders and feedback will be considered in decision-making processes.
- Any conflicts of interest involving executives or board members will be promptly disclosed to shareholders, and measures will be taken to address these conflicts in a fair and transparent manner.
- Adhere to all applicable laws, regulations, and corporate governance standards concerning shareholder rights.

**RESPONSIBILITY:** Everybody involved in our endeavors to manage and oversee Shareholder relations policy, including statutory (technical) authorities, subject matter experts, business associates, contractors, clients, occupants, and our own staff.

**AMENDMENTS:** This policy is subject to any changes in the applicable laws, rules and regulations by the management.

For BPTP International Trade Centre Limited  
[Signature]  
[Name]  
[Title]