



SSB CAPITAL HOLDINGS LTD.

#65 Violet Circle,
Oxnards, St. James,
Bridgetown, Barbados, BB23019

BUSINESS CONDUCT POLICY

The way we do business worldwide

SSB CAPITAL HOLDINGS LTD. conducts business ethically, honestly, and in full compliance with applicable laws and regulations. This applies to every business decision in every area of the company worldwide.

SSB CAPITAL HOLDINGS LTD.'s Principles of Business Conduct

SSB CAPITAL HOLDINGS LTD.'s success is based on creating innovative, high-quality products and services and on demonstrating integrity in every business interaction. SSB CAPITAL HOLDINGS LTD.'s principles of business conduct define the way we do business worldwide. These principles are:

- **Honesty.** Demonstrate honesty and high ethical standards in all business dealings.
- **Respect.** Treat customers, suppliers, employees, and others with respect and courtesy.
- **Confidentiality.** Protect the confidentiality of SSB CAPITAL HOLDINGS LTD.'s information and the information of our subsidiaries, shareholders, customers, suppliers, and employees.
- **Compliance.** Ensure that business decisions comply with applicable laws and regulations.

PLEASE CONTINUE READING ON THE FOLLOWING PAGE

Your Responsibilities

SSB CAPITAL HOLDINGS LTD.'s Business Conduct Policy and principles apply to directors, employees, independent contractors, consultants, and others who do business with SSB CAPITAL HOLDINGS LTD. You are expected to:

- **Follow the policy.** Comply with SSB CAPITAL HOLDINGS LTD.'s Business Conduct Policy, principles, and all applicable legal requirements.
- **Speak up.** If you have knowledge of a possible violation of SSB CAPITAL HOLDINGS LTD.'s Business Conduct Policy or principles, other SSB CAPITAL HOLDINGS LTD. policies, or legal or regulatory requirements, you must notify either your manager (provided your manager is not involved in the violation), HR, Legal, Internal Audit, Finance, or the Business Conduct office.
- **Use good judgment.** Apply SSB CAPITAL HOLDINGS LTD.'s principles of business conduct, review our policies, review legal requirements, and then decide what to do.
- **Ask questions.** When in doubt about how to proceed, discuss it with your manager, your Human Resources representative.

Failure to comply with SSB CAPITAL HOLDINGS LTD.'s Business Conduct Policy, or failure to report a violation, may result in disciplinary action up to and including termination of employment or the end of your working relationship with SSB CAPITAL HOLDINGS LTD..

Retaliation Is Not Tolerated

SSB CAPITAL HOLDINGS LTD. will not retaliate—and will not tolerate retaliation—against any individual for filing a good-faith complaint with management, HR, Legal, Internal Audit, Finance, or for participating in the investigation of any such complaint.

Can you give an example of conflicts of interest or potential divided loyalty? Your niece needs a summer internship and you decide to hire her into your organization, or, your brother-in-law owns a business that is being considered as a vendor for SSB CAPITAL HOLDINGS LTD., and you are one of the decision makers.

May I occasionally use my SSB CAPITAL HOLDINGS LTD. or dedicated work email address for my outside business? You may never use your SSB CAPITAL HOLDINGS LTD. email for an outside business.

May I serve on the board of directors of an outside enterprise or organization? Yes. Employees must obtain written permission from their manager and vice president before accepting board positions on non-profit organizations that do not relate SSB CAPITAL HOLDINGS LTD.'s present, or reasonably anticipated business. Employees must obtain written permission from their manager and senior vice president before accepting board positions on for-profit organizations, or for other groups that relate to SSB CAPITAL HOLDINGS LTD.'s present, or reasonably anticipated business. Vice presidents and Executive Team members must obtain written permission from the CEO before accepting such positions.

A conflict of interest is any activity that is inconsistent with or opposed to SSB CAPITAL HOLDINGS LTD.'s best interest, or that gives the appearance of impropriety or divided loyalty. Avoid any situation that creates a real or perceived conflict of interest. Use good judgment, and if you are unsure about a potential conflict, talk to your manager or contact Human Resources.

Do not conduct SSB CAPITAL HOLDINGS LTD. business with family members or others with whom you have a significant personal relationship. In rare cases where exceptions may be appropriate, written approval from the senior vice president of your organization is required.

You shouldn't use your position at SSB CAPITAL HOLDINGS LTD. to obtain favored treatment for yourself, family members, or others with whom you have a significant relationship. This applies to sales, investment opportunities, hiring, promoting, selecting contractors or suppliers, and any other business matter. This does not apply to special purchase plans offered by SSB CAPITAL HOLDINGS LTD. like the employee discount. If you believe you have a potential conflict involving a family member or other individual, disclose it to your manager.

PLEASE CONTINUE READING ON THE FOLLOWING PAGE

Outside Employment and Inventions

SSB CAPITAL HOLDINGS LTD. employees must notify their manager before taking any other employment. In addition, any employee (full-time or part-time) who obtains additional outside employment, has an outside business, or is working on an invention must comply with the following rules.

Do not:

- Use any time at work or any SSB CAPITAL HOLDINGS LTD. assets for your other job, outside business, or invention. This includes using SSB CAPITAL HOLDINGS LTD. workspace, phones, computers, Internet access, copy machines, and any other SSB CAPITAL HOLDINGS LTD. assets or services.
- Use your position at SSB CAPITAL HOLDINGS LTD. to solicit work for your outside business or other employer, to obtain favored treatment, or to pressure others to assist you in working on your invention.
- Participate in an outside employment activity that could have an adverse effect on your ability to perform your duties at SSB CAPITAL HOLDINGS LTD.
- Use confidential SSB CAPITAL HOLDINGS LTD. information to benefit your other employer, outside business, or invention.

Before participating in inventions or businesses that are in the same area as your work for SSB CAPITAL HOLDINGS LTD. or that compete with or relate to SSB CAPITAL HOLDINGS LTD.'s present or reasonably anticipated business, products, or services, you must have written permission from your manager, an SSB CAPITAL HOLDINGS LTD. law attorney, and the senior vice president of your organization.

Personal Investments

Many SSB CAPITAL HOLDINGS LTD. employees have investments in publicly traded stock or privately held businesses. In general, these are fine, but investments may give rise to a conflict of interest if you are involved in or attempt to influence transactions between SSB

CAPITAL HOLDINGS LTD. and a business in which you are invested. If a real or apparent conflict arises, disclose the conflict to your manager. Your manager will help determine whether a conflict exists and, if appropriate, the best approach to eliminate the conflict.

Conflicts of Interest

I have stock in companies that do business with SSB CAPITAL HOLDINGS LTD. Is this a problem? Probably not. However, it could be a concern if you are influencing a transaction between SSB CAPITAL HOLDINGS LTD. and the company, or the transaction is significant enough to potentially affect the value of your investment.

How do I know whether information is material? Determining what constitutes material information is a matter of judgment. In general, information is material if it would likely be considered important by an investor buying or selling the particular stock.

Does SSB CAPITAL HOLDINGS LTD.'s policy apply to buying or selling stock in other companies? Yes. For example, say you learn about a business's nonpublic expansion plans through work discussions. If you purchase stock in the business's company or advise others to do so, it could be viewed as insider trading.

What is harassment?

Harassment can be verbal, visual, or physical in nature. Specific examples of prohibited harassing conduct include, but are not limited to, slurs, jokes, statements, notes, letters, electronic communication, pictures, drawings, posters, cartoons, gestures, and unwelcome physical contact that are based on an individual's protected class.

Personal relationships in the workplace may present an actual or perceived conflict of interest when one individual in the relationship is in a position to make or influence employment decisions regarding the other. If you find yourself in such a relationship, you must notify Human Resources so they may assist you in resolving any potential conflicts. Employees should not allow their relationships to disrupt the workplace or interfere with their work or judgment.

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Buying and Selling Stock

Never buy or sell stock when aware of information that has not been publicly announced and could have a material effect on the value of the stock. This applies to decisions to buy or sell SSB CAPITAL HOLDINGS LTD. stock and to third party stock, such as the stock of an SSB CAPITAL HOLDINGS LTD. supplier or vendor. It is also against SSB CAPITAL HOLDINGS LTD. policy and may be illegal to give others, such as friends and family, tips on when to buy or sell stock when aware of material, nonpublic information concerning that stock.

In addition, employees are prohibited from investing in derivatives of SSB CAPITAL HOLDINGS LTD. stock, including hedging transactions and transactions involving options, warrants, puts, or calls or similar instruments related to shares of SSB CAPITAL HOLDINGS LTD. stock.

Members of SSB CAPITAL HOLDINGS LTD.'s board of directors, executive officers, and certain other individuals are subject to blackout periods during which they are prohibited from trading in SSB CAPITAL HOLDINGS LTD. stock. If you are subject to these restrictions, you will be notified by the legal department. Even if you are not subject to blackout periods, you may never buy or sell stock when aware of material, nonpublic information.

Harassment and Discrimination

SSB CAPITAL HOLDINGS LTD. encourages a creative, culturally diverse, and supportive work environment. SSB CAPITAL HOLDINGS LTD. is committed to providing a workplace free of discrimination and sexual harassment, as well as harassment or discrimination based on such factors as race, color, creed, religion, sex, national origin, marital status, age, sexual orientation, gender identity characteristics or expression, genetic information, physical or mental disability, pregnancy, medical condition, or any other basis protected by local law. SSB CAPITAL HOLDINGS LTD. will not tolerate discrimination or harassment of employees or non-employees with whom we have a business, service, or professional relationship. This applies to interactions with employees, customers, suppliers, and applicants for employment, and any other interactions where you represent SSB CAPITAL HOLDINGS LTD.

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If you feel that you have been harassed or discriminated against or have witnessed such behavior, report the incident to any member of the Human Resources department, any supervisor or manager, up to, and including the CEO, or the Board of Directors.

Workplace Relationships

Is personal information on my computer system private? No. Limited personal use of SSB CAPITAL HOLDINGS LTD. equipment and systems is allowed. However, SSB CAPITAL HOLDINGS LTD. may monitor equipment and systems. You should not have any expectation about the privacy of content or personal information.

If I make a presentation on my own time, may I accept a payment? That depends. If you are representing SSB CAPITAL HOLDINGS LTD., you may not accept payment. If you are on your own time and are not representing SSB CAPITAL HOLDINGS LTD., you may be allowed to accept payment. Before accepting this type of opportunity check with your manager or Human Resources.

What if I have a substance abuse issue?

Help yourself and SSB CAPITAL HOLDINGS LTD. by taking action. Talk to your Human Resources representative.

As part of your job, you may have access to personal information regarding other SSB CAPITAL HOLDINGS LTD. employees or applicants, including information regarding their employment history, personal contact information, compensation, health information, or performance and disciplinary matters. This information is confidential and should be shared only with those who have a business need to know. It should not be shared outside SSB CAPITAL HOLDINGS LTD. unless there is a legal or business reason to share the information and you have approval from your manager.

Workplace Privacy

As an SSB CAPITAL HOLDINGS LTD. employee, it's important you understand that, subject to local laws and regulations and in accordance with SSB CAPITAL HOLDINGS LTD.'s review process, SSB CAPITAL HOLDINGS LTD. may take the following steps when you

access SSB CAPITAL HOLDINGS LTD.'s network or systems or use any device, regardless of ownership, to conduct SSB CAPITAL HOLDINGS LTD. business:

- Access, search, monitor, and archive all data and messages sent, accessed, viewed, or stored (including those from the Cloud, iCloud, Messages, or other personal accounts).
- Conduct physical, video, or electronic surveillance, search your workspace (such as file cabinets, desks, and offices, even if locked), review phone records, or search any non-SSB CAPITAL HOLDINGS LTD. property (e.g. backpacks, purses) on company premises.
- Disclose to law enforcement information discovered during any search that indicates possible unlawful behavior without prior notice.

Public Speaking and Press Inquiries

All public speaking engagements that relate to SSB CAPITAL HOLDINGS LTD.'s business or products must be pre-approved by your manager and Corporate Communications. If you receive approval to make a public presentation at a business meeting or conference, you may not request or accept any form of personal compensation from the organization that requested the presentation. This does not prohibit accepting reimbursement for expenses, if approved by your manager.

All inquiries from the press or the financial analyst community must be referred to Corporate Communications or Investor Relations.

Publishing Articles

If you author an article or other publication, do not identify yourself in the publication as an SSB CAPITAL HOLDINGS LTD. employee without prior approval from Corporate Communications or the CEO. In addition, in some cases, such publications may require Senior Vice President and Legal approval.

Alcohol, Drugs, and a Smoke Free Environment in the Workplace

Employees are prohibited from manufacturing, distributing, dispensing, possessing, using, or being under the influence of illegal drugs in the workplace. Use of alcohol or

medications on the job or before work can cause safety issues, damage customer relations, and hurt productivity and innovation. Use good judgment and keep in mind that you are expected to perform to your full ability when working for SSB CAPITAL HOLDINGS LTD.

Confidential Employee Information

Responsibilities to SSB CAPITAL HOLDINGS LTD.

What are assets?

Assets include SSB CAPITAL HOLDINGS LTD.'s proprietary information (such as intellectual property, confidential business plans, unannounced product plans, sales and marketing strategies, and other trade secrets), as well as physical assets like cash, equipment, supplies, and product inventory.

Can I give an SSB CAPITAL HOLDINGS LTD.-owned device to my family member for use? No. You are responsible for protecting SSB CAPITAL HOLDINGS LTD.'s assets at all times. You must follow all security procedures regarding SSB CAPITAL HOLDINGS LTD.'s property.

If I believe that it is appropriate to disclose confidential proprietary information to a vendor or other third party, what should I do?

First, verify that there is a business need for the disclosure. Second, obtain your manager's approval for the disclosure. Third, be sure that a non-disclosure/ confidentiality agreement is in place with the vendor, or third party, and that you forward the original copy of the agreement to the legal department. If you are still unsure, check with the legal department before making the disclosure.

How do I identify confidential SSB CAPITAL HOLDINGS LTD. information in documents? Mark these documents "SSB CAPITAL HOLDINGS LTD. Confidential."

What if I have a specific question on the use of the SSB CAPITAL HOLDINGS LTD. name, names of products or services, or the SSB CAPITAL HOLDINGS LTD. logo?

Please direct questions to any SSB CAPITAL HOLDINGS LTD. legal counsel.

Protecting SSB CAPITAL HOLDINGS LTD.'s Assets and Information

We all have an obligation to protect SSB CAPITAL HOLDINGS LTD.'s property and to abide by the following guidelines:

- **Watch what you say.** Surprise and delight are SSB CAPITAL HOLDINGS LTD. hallmarks. Being aware of who is around you, and what they might learn from you is an important way we all protect SSB CAPITAL HOLDINGS LTD.'s secrets. Don't let SSB CAPITAL HOLDINGS LTD. secrets fall into the wrong hands.
- **Protect our stuff.** Keeping track of SSB CAPITAL HOLDINGS LTD. assets and information entrusted to you, and preventing opportunities for loss, misuse, waste, or theft of SSB CAPITAL HOLDINGS LTD. property is everyone's responsibility. Trash is inevitable. Waste is not. Before disposing of SSB CAPITAL HOLDINGS LTD. assets, discuss your plans with your manager, get approval, and follow applicable policies.
- **Set the example.** Behaviors are contagious. Be a model for your co-workers and our partners. Follow our procurement procedures when acquiring goods or services and use SSB CAPITAL HOLDINGS LTD.'s assets only for legal and ethical purposes.

Confidential SSB CAPITAL HOLDINGS LTD. Information

One of SSB CAPITAL HOLDINGS LTD.'s greatest assets is information about our products and services, including future product offerings. Never disclose confidential, operational, financial, trade secret, or other business information without verifying with your manager that such disclosure is appropriate. Typically, disclosure of this information is very limited, and the information may be shared with vendors, suppliers, or other third parties only after a non-disclosure agreement is in place.

PLEASE CONTINUE READING ON THE FOLLOWING PAGE

Even within SSB CAPITAL HOLDINGS LTD., confidential information should be shared only on a need-to-know basis. The Intellectual Property Agreement you signed when you joined SSB CAPITAL HOLDINGS LTD. defines your duty to protect information.

The SSB CAPITAL HOLDINGS LTD. Identity and Trademarks

The SSB CAPITAL HOLDINGS LTD. name, names of products (such as investment plans and studies), names of services, taglines, and logos collectively create the SSB CAPITAL HOLDINGS LTD. identity. Before publicly using the SSB CAPITAL HOLDINGS LTD. name, product names, service names, taglines, or the SSB CAPITAL HOLDINGS LTD. logo, review SSB CAPITAL HOLDINGS LTD.'s Trademark List and Corporate Identity Guidelines on how names and logos can be used and presented (for example, the size of the SSB CAPITAL HOLDINGS LTD. logo and the amount of white space surrounding it). Before using the product names, service names, taglines, or logos of third parties, check with the legal department.

SSB CAPITAL HOLDINGS LTD. Inventions, Patents, and Copyrights

SSB CAPITAL HOLDINGS LTD.'s practice is to consider patenting the inventions of its employees, regardless of whether the inventions are implemented in actual products. If you are involved in product development, you should contact Legal regarding the patentability of your work. Be alert to possible infringement of SSB CAPITAL HOLDINGS LTD.'s patents and bring any possible infringements directly to Legal.

If you create original material for SSB CAPITAL HOLDINGS LTD. that requires copyright protection, such as software, place SSB CAPITAL HOLDINGS LTD.'s copyright notice on the work and submit a copyright disclosure form to Legal. For more information, visit the SSB

Responsibilities to SSB CAPITAL HOLDINGS LTD.

Activities Related to Technical Standards

There are numerous organizations that develop or promote technical standards (such as W3C, OASIS, INCITS, IEEE, ETSI). Before engaging in activities related to technical standards, including, for example, joining a standards organization or working group, contributing

technology to a standard, or using a standard in the development of an SSB CAPITAL HOLDINGS LTD. product, employees must receive management and Legal approval. For additional information, see SSB CAPITAL HOLDINGS LTD.'s Standards Legal Policy.

Accuracy of Records and Reports

Accurate records are critical to meeting SSB CAPITAL HOLDINGS LTD.'s legal, financial, and management obligations. Ensure that all records and reports, including timecards, customer information, technical and product information, correspondence, and public communications, are full, fair, accurate, timely, and understandable.

Never misstate facts, omit critical information, or modify records or reports in any way to mislead others, and never assist others in doing so.

Business Expenses

All employees must observe policies and procedures regarding business expenses, such as meal and travel expenses, and submit accurate expense reimbursement requests. Guidelines on daily meal expenses vary worldwide. For more information view the SSB CAPITAL HOLDINGS LTD. Travel Policy.

Money Laundering

Money laundering is the process by which individuals or organizations try to conceal illicit funds or make these funds look legitimate. Money laundering is strictly prohibited. The laws in certain countries require SSB CAPITAL HOLDINGS LTD. to report suspicious activity. If you deal directly with customers or vendors, the following examples may be indications of potential money laundering:

- Attempts to make large payments in cash.
- Payments by someone who is not a party to the contract.
- Requests to pay more than provided for in the contract.
- Payments made in currencies other than those specified in the contract.
- Payments from an unusual, nonbusiness account.

- Transactions forming an unusual pattern such as bulk purchases of products or gift cards, or many repetitive cash payments.

If I suspect money laundering, what should I do? Advise your manager or the CEO.

Records & Information Management and Legal Hold

As an SSB CAPITAL HOLDINGS LTD. employee, you have a responsibility to manage records and information. The definition of “records and information” is extremely broad. **Information** includes all documents and data; however, **Records** are a subset and must be kept because they have enduring business value, must be kept pursuant to other SSB CAPITAL HOLDINGS LTD. policies for legal, accounting and other regulatory requirements.

At times, SSB CAPITAL HOLDINGS LTD. may need to retain records and information beyond the period they would normally be kept. The most common reasons are litigation, other legal matters or audits.

In these situations, retention and preservation of records and information is critical. If you have records and information that may be required for litigation or other legal matters, the legal department will place those documents on a legal hold, meaning the records and information cannot be altered, destroyed, deleted, or modified in any manner. Legal will notify the individuals most closely identified with the records and information about the legal hold and will provide instructions for retaining the records and information. Recipients of a legal hold must ensure that these instructions are followed. A legal hold remains in effect until you are notified by the legal department in writing.

Tell me more about legal holds.

In a litigation case or other legal matter, SSB CAPITAL HOLDINGS LTD. may be required to produce documents. In these cases the legal department may put a legal hold on certain documents to prevent the documents from being destroyed, altered, or modified. If it is found that SSB CAPITAL HOLDINGS LTD. has failed to retain or produce required documents, penalties or adverse rulings may result.

Adverse rulings in major litigation cases can cost SSB CAPITAL HOLDINGS LTD. a significant amount of money. Failure of employees to retain and preserve documents placed on legal hold may result in discipline or discharge.

Customer and Business Relationships

To what extent may I use an existing customer list to market other SSB CAPITAL HOLDINGS LTD. products or services? Before using a customer list for marketing, sales, or other activities, talk to your manager or the legal department. Using an existing customer list may or may not be appropriate.

Where can I learn more about information protection and non-disclosure agreements? Speak with any of the SSB CAPITAL HOLDINGS LTD. legal counsel.

Where can I get a non-disclosure agreement? SSB CAPITAL HOLDINGS LTD. provides non-disclosure/ confidentiality agreements.

As long as the information helps SSB CAPITAL HOLDINGS LTD., why is the source of business intelligence an issue? Obtaining information illegally or unethically could damage SSB CAPITAL HOLDINGS LTD.'s reputation and in some cases could subject you and SSB CAPITAL HOLDINGS LTD. to legal liability. For example, using illegally or unethically obtained information in a bid to the government could result in disqualification from future bidding and criminal charges.

Customer Focus

Every product, business activity we make or embark on and every service we provide is for our shareholders and customers. Focus on providing innovative, high-quality products, businesses and services and demonstrating integrity in every business interaction. Always apply SSB CAPITAL HOLDINGS LTD.'s principles of business conduct.

Customer and Third-Party Information

Customers, suppliers, and others disclose confidential information to SSB CAPITAL HOLDINGS LTD. for business purposes. It is the responsibility of every SSB CAPITAL

HOLDINGS LTD. employee to protect and maintain the confidentiality of this information. Failure to protect customer and third-party information may damage relations with customers, suppliers, or others and may result in legal liability.

Non-Disclosure/Confidentiality Agreements

When dealing with a investor, supplier, vendor, or other third party, never share confidential information without your manager's approval. Also, never share confidential information outside SSB CAPITAL HOLDINGS LTD. (for example, with vendors, suppliers, or others) unless a non-disclosure/ confidentiality agreement is in place. These agreements document the need to maintain the confidentiality of the information. Original copies of non-disclosure agreements must be forwarded to the legal department. Always limit the amount of confidential information shared to the minimum necessary to address the business need.

Obtaining and Using Business Intelligence

SSB CAPITAL HOLDINGS LTD. legitimately collects information on customers and markets in which we operate. SSB CAPITAL HOLDINGS LTD. does not seek business intelligence by illegal or unethical means, and competitors may not be contacted for the purpose of obtaining business intelligence. Sometimes information is obtained accidentally or is provided to SSB CAPITAL HOLDINGS LTD. by unknown sources. In such cases, it may be unethical to use the information, and you should immediately contact your manager or the legal department to determine how to proceed.

Third-Party Intellectual Property

It is SSB CAPITAL HOLDINGS LTD.'s policy not to knowingly use the intellectual property of any third party without permission or legal right. If you are told or suspect that SSB CAPITAL HOLDINGS LTD. may be infringing an intellectual property right, including patents, copyrights, trademarks, or trade secrets owned by a third party, you should contact the legal department.

PLEASE CONTINUE READING ON THE FOLLOWING PAGE

Copyright-Protected Content

Never use or copy documents, software, music, videos, publications, or other copyright-protected content at work or for business purposes unless you or SSB CAPITAL HOLDINGS LTD. are legally permitted to use or make copies of the protected content. Never use SSB CAPITAL HOLDINGS LTD. facilities or equipment to make or store unauthorized copies.

Customer and Business Relationships

Are business meals, travel, and entertainment considered gifts? Yes. Anything of value is considered a gift.

Can I avoid these rules if I pay for gifts to customers or business associates myself? No. If the gift is given for business reasons and you are representing SSB CAPITAL HOLDINGS LTD., the gift rules apply.

Employees may not give or receive gifts or entertainment to or from current or potential vendors, suppliers, customers, or other business associates unless all of the following conditions are met:

- **Nominal value.** The value of the gift is less than US\$150. Exceptions must be approved by your vice president (for vice president–level employees, exceptions must be approved by your manager).
- **Customary.** The item is a customary business gift and would not embarrass SSB CAPITAL HOLDINGS LTD. if publicly disclosed. Cash is never an acceptable gift. Giving or receiving cash is viewed as a bribe or kickback and is always against SSB CAPITAL HOLDINGS LTD. policy.
- **No favored treatment.** The purpose of the gift is not to obtain special or favored treatment.
- **Legal.** Giving or accepting the gift is legal in the location and under the circumstances where given.
- **Recipient is not a government official.** Never provide a gift, including meals, entertainment, or other items of value, to a Barbados or foreign government official

without checking with Government Affairs in advance. See page 13 for more information on gifts to government officials.

This policy does not preclude SSB CAPITAL HOLDINGS LTD. as an organization from receiving and evaluating complimentary products or services. It is not intended to preclude SSB CAPITAL HOLDINGS LTD. from giving equipment to a company or organization, provided the gift is openly given, consistent with legal requirements, and in SSB CAPITAL HOLDINGS LTD.'s business interests. The policy also does not preclude the attendance of SSB CAPITAL HOLDINGS LTD. employees at business-related social functions, if attendance is approved by management and does not create a conflict of interest.

Zero Gift Rule: Certain departments, including Business Conduct and Global Compliance, Facilities, Filemaker, Finance, Global Security, Hardware, Hardware Technologies, Human Resources, Operations and Software have more restrictive gift policies that prohibit giving or receiving gifts altogether. Employees in these departments must adhere to the stricter policies.

Side Deals or Side Letters

All the terms and conditions of agreements entered into by SSB CAPITAL HOLDINGS LTD. must be formally documented. Contract terms and conditions define the key attributes of SSB CAPITAL HOLDINGS LTD.'s rights, obligations, and liabilities and can also dictate the accounting treatment given to a transaction. Making business commitments outside of the formal contracting process, through side deals, side letters, or otherwise, is unacceptable. You should not make any oral or written commitments that create a new agreement or modify an existing agreement without approval through the formal contracting process.

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Giving and Receiving Business Gifts

Customer and Business Relationships

What can I do if a reseller complains to me about low prices at another reseller? Advise the reseller that you can't discuss or attempt to influence pricing of other parties since this could violate antitrust laws.

What is an example of an endorsement?

A friend writes a great book on investment and asks you to endorse the book by making a statement on the back cover. If you make such an endorsement, don't include your job title or affiliation with SSB CAPITAL HOLDINGS LTD.

Competition and Trade Practices

Agreements with competitors are subject to rigorous scrutiny in all countries. Competitors are expected to compete and compete aggressively on all terms. Agreements with our resellers, distributors, and suppliers can also give rise to scrutiny, particularly if SSB CAPITAL HOLDINGS LTD. has a leading position in the market.

You should not:

- Agree with competitors or exchange information with competitors on price, policies, contract terms, costs, inventories, marketing plans, capacity plans, or other competitively significant terms.
- Agree with competitors to divide sales.
- Violate fair bidding practices, including bidding quiet periods, or provide information to benefit one vendor over other vendors.
- Engage in any pricing or other practices that could defraud a supplier or others. Remember: Always consult the Competition Law Team whenever you have a question.

When representing SSB CAPITAL HOLDINGS LTD., never endorse a product or service of another business or an individual unless the endorsement has been approved by your manager

and Corporate Communications. This does not apply to statements you may make in the normal course of business about third-party products that are sold by SSB CAPITAL HOLDINGS LTD.

Open Source Software

Open source software is software for which the source code is available without charge under a free software or open source license. Before using, modifying, or distributing any open source software for SSB CAPITAL HOLDINGS LTD. infrastructure or as part of an SSB CAPITAL HOLDINGS LTD. product or service development effort, you must review SSB CAPITAL HOLDINGS LTD.'s Open Source Software Policy and contact Legal for approval using the forms referenced in that policy.

Governments and Communities

Tell me more about pricing products that are sold to governments. Governments shouldn't be charged more for our products or services than SSB CAPITAL HOLDINGS LTD. charges other customers for the same products or services. There are laws that make it a crime to overcharge the U.S. government. Some other countries have similar laws.

Can I avoid a gift limitation by paying for a gift, such as lunch or golf, myself? No. If you are representing SSB CAPITAL HOLDINGS LTD, any gift to a government employee would be viewed as coming from SSB CAPITAL HOLDINGS LTD.

What is considered a gift to a Barbados or foreign official? In most cases, anything of value that is given is considered a gift. This includes items such as meals, golf, entertainment, and product samples. Cash is never an acceptable gift. Typically, giving cash is viewed as a bribe or kickback and is against SSB CAPITAL HOLDINGS LTD. policy.

Who is a "foreign official"?

A foreign official is any official or employee of a foreign government or public international organization (including departments or agencies of those governments or organizations), or

any person acting in an official capacity. Also included are employees of a state-run or state-owned business, such as a public utility, and employees of a public/ government-run school or university.

Governments as Customers

Governments will be unique customers for SSB CAPITAL HOLDINGS LTD. Governments often place special bidding, pricing, disclosure, and certification requirements on firms with which they do business. Discuss these requirements with Government Affairs or your local SSB CAPITAL HOLDINGS LTD. Legal representative before bidding for government business.

Gifts to U.S. Officials

It may be illegal to give a gift, even an inexpensive meal or a T-shirt, to a government employee. The rules vary depending on the location and job position of the government employee (for example, rules may vary by state, school district, and city, and there may be different rules for various elected and non-elected officials).

To prevent violations, review all gifts to government officials with Government Affairs before giving a gift.

Gifts to Non-U.S. Officials

In many countries it is considered common courtesy to provide token/ceremonial gifts to government officials on certain occasions to help build relationships. Check local requirements and review any such gifts exceeding US\$25 in advance with Legal. For meals, the US\$25 limit does not necessarily apply. Check for value limits by country on meals to public officials and employees. Meals of any value should be avoided with officials from government agencies where SSB CAPITAL HOLDINGS LTD. has a pending application, proposal, or other business.

PLEASE CONTINUE READING ON THE FOLLOWING PAGE

No Bribery or Corruption

At SSB CAPITAL HOLDINGS LTD., we do not offer or accept bribes or kickbacks in any form and we do not tolerate corruption in connection with any of our business dealings. You may not offer or receive bribes or kickbacks to, or from, any individual, whether that individual is a government official or a private party.

Political Contributions

SSB CAPITAL HOLDINGS LTD. does not make political contributions to individual candidates or parties. All corporate political contributions, whether monetary or in-kind (such as the donation/ lending of equipment or technical services to a campaign), must be approved in advance by SSB CAPITAL HOLDINGS LTD.'s CEO and processed by SSB CAPITAL HOLDINGS LTD. Government Affairs to ensure compliance with disclosure regulations and SSB CAPITAL HOLDINGS LTD.'s policy of promptly reporting contributions on the SSB CAPITAL HOLDINGS LTD. website. Employees may not use SSB CAPITAL HOLDINGS LTD. assets (including employee work time, or use SSB CAPITAL HOLDINGS LTD. premises, equipment, or funds) to personally support candidates and campaigns. It is illegal for SSB CAPITAL HOLDINGS LTD. to reimburse an employee for a contribution.

Governments and Communities

What should I do if I'm interested in hiring a current or recent government employee?

Contact Legal counsel for SSB CAPITAL HOLDINGS LTD. before beginning any negotiations to hire a current or recent government, military, or other public sector employee as an SSB CAPITAL HOLDINGS LTD. employee or consultant.

How do I get more information regarding SSB CAPITAL HOLDINGS LTD.'s environmental, health, and safety programs?

Laws often limit the duties and types of services that former government, military, or other public sector employees may perform as employees or consultants of SSB CAPITAL HOLDINGS LTD.

Employment negotiations with government employees are prohibited while the employees are participating in a matter involving SSB CAPITAL HOLDINGS LTD.'s interests.

Trade Restrictions and Export Controls

Many countries periodically impose restrictions on exports and other dealings with certain countries, persons, or groups. Export laws may control trading of commodities or technologies that are considered to be strategically important because they have the potential to be used for military purposes. Laws may cover travel to or from a sanctioned country, imports or exports, new investments, and other related topics. Certain laws also prohibit support of boycott activities.

If your work involves the sale or shipment of products, technologies, or services across international borders, check with the export department to ensure compliance with any laws or restrictions that apply.

Environment, Health, and Safety (EHS)

SSB CAPITAL HOLDINGS LTD. operates in a manner that conserves the environment and protects the safety and health of our employees. Conduct your job safely and consistently with applicable EHS requirements. Use good judgment and always put the environment, health, and safety first. Be proactive in anticipating and dealing with EHS risks.

In keeping with our commitment to the safety of our people, SSB CAPITAL HOLDINGS LTD. will not tolerate workplace violence. For additional information, review SSB CAPITAL HOLDINGS LTD.'s Workplace Violence Policy.

Charitable Donations

Employees are encouraged to support charitable causes of their choice as long as that support is provided without the use or furnishing of SSB CAPITAL HOLDINGS LTD. assets (including employee work time or use of SSB CAPITAL HOLDINGS LTD. premises, equipment, or funds). Any charitable donations involving SSB CAPITAL HOLDINGS LTD. assets require the approval of the Chief Executive Officer or Chief Financial Officer.

Community Activities and Public Positions

At SSB CAPITAL HOLDINGS LTD., we comply with applicable laws and regulations and operate in ways that benefit the communities in which we conduct business. SSB CAPITAL HOLDINGS LTD. encourages you to uphold this commitment to the community in all your activities.

If you hold an elected or appointed public office while employed at SSB CAPITAL HOLDINGS LTD., advise Government Affairs. Excuse yourself from involvement in any decisions that might create or appear to create a conflict of interest.

What if I want to get more involved in community activities? Contact Community Affairs. This group promotes, supports, and facilitates employee involvement in community volunteer activities. Outside the Barbados., check with your local Public Relations team or Human Resources.

Hiring Government Employees

Taking Action

Your Obligation to Take Action

Always apply SSB CAPITAL HOLDINGS LTD.'s principles of business conduct, follow SSB CAPITAL HOLDINGS LTD. policies, and comply with laws and regulations. When you are unsure, take the initiative to investigate the right course of action. Check with your manager, Human Resources, Legal, Internal Audit, or Finance, and review our policies on our website. If you would like to talk with someone outside your immediate area, consider contacting the Business Conduct Helpline.

If you know of a possible violation of SSB CAPITAL HOLDINGS LTD.'s Business Conduct Policy or legal or regulatory requirements, you are required to notify your manager (provided your manager is not involved in the violation), Human Resources, Legal, Internal Audit, Finance, or the Business Conduct Helpline. Failure to do so may result in disciplinary action.

Employees must cooperate fully in any SSB CAPITAL HOLDINGS LTD. investigation and keep their knowledge and participation confidential to help safeguard the integrity of the investigation.

Business Conduct Helpline

The Business Conduct Helpline is available 24/7 to all employees worldwide to help answer your questions on business conduct issues, policies, regulations, and compliance with legal requirements. It also allows you to advise SSB CAPITAL HOLDINGS LTD. of situations that may require investigation or management attention.

The Business Conduct Helpline is committed to keeping your issues and identity confidential. If you would be more comfortable doing so, you may contact the Helpline anonymously. Your information will be shared only with those who have a need to know, such as those involved in answering your questions or investigating and correcting issues you raise. If your information involves accounting, finance, or auditing, the law may require that necessary information be shared with the Audit and Finance Committee of the SSB CAPITAL HOLDINGS LTD. Board of Directors.

SSB CAPITAL HOLDINGS LTD. will not retaliate—and will not tolerate retaliation—against any individual for reporting a concern in good.