

Code of Conduct

The company is committed to conducting business with the highest standards of integrity, ethics, and compliance. This Code of Conduct serves as a guide for all employees, directors, contractors, and representatives (collectively “representatives”) in carrying out their responsibilities ethically and in accordance with the law.

Compliance with Laws and Regulations

All representatives comply with applicable local, national, and international laws and regulations, including those related to software development, data protection, intellectual property, export controls (sanctions and other restrictions), and anti-bribery statutes.

Confidentiality and Data Privacy

Representatives protect sensitive and confidential information, including client data, trade secrets, and intellectual property. Personal data is handled in accordance with data protection regulations such as GDPR, CCPA, or any other applicable laws.

Intellectual Property Protection

Representatives only use licensed software and content.

Conflict of Interest

Bribery, corruption, kickbacks, or any unethical practices in securing business or influencing decisions is prohibited.

Export Controls and Sanctions

Adhere to all applicable export control laws and economic sanctions regulations, including those administered by:

- Hong Kong financial sanctions in accordance with United Nations Security Council Resolutions (UNSCRs), United Nations Sanctions Ordinance (UNSO) and the United Nations (Anti-Terrorism Measures) Ordinance (UNATMO).
- The U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC)
- The U.S. Department of Commerce’s Bureau of Industry and Security (BIS)
- The European Union, United Kingdom, and other relevant jurisdiction

Any activity that may directly or indirectly involve sanctioned parties or customers in embargoed countries is prohibited.