

HypeX Digital (Pvt) Ltd

Internal Code of Business Conduct and Ethics

Effective Date: 1 Jan 2025

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1. Purpose

The Board of Directors of HypeX Digital (Pvt) Ltd has adopted this Code to provide clear guidance on ethical behavior for all employees. This Code is designed to foster a culture of integrity, accountability, and transparency while ensuring that our digital services and marketing practices meet the highest professional and regulatory standards in Sri Lanka. It serves as a framework to help employees recognize ethical challenges, report misconduct, and maintain public trust in our brand.

2. Introduction

HypeX Digital is committed to upholding exemplary ethical standards in every aspect of its digital operations. All employees from entry-level staff to senior management are expected to conduct themselves with honesty, fairness, and respect. This Code is particularly critical in our digital environment, where accurate digital communications, data handling, and online behavior directly impact our reputation and business success.

3. Integrity of Digital Records and Communications

Employees must ensure that all digital records, communications, and public disclosures are accurate, complete, and maintained with integrity. This includes but is not limited to:

- Digital marketing materials and online advertisements.
- Client communications and social media content.
- Internal reports, data analytics, and performance metrics.

Maintaining reliable digital records supports operational efficiency and ensures compliance with both internal standards and Sri Lankan regulatory requirements.

4. Conflicts of Interest

Employees must avoid any situation where personal interests might conflict, or appear to conflict, with the interests of HypeX Digital. Examples of conflicts include:

- Personal relationships or financial interests that may influence business decisions.
- Acceptance of gifts or benefits that could compromise impartiality.
- Any activity that detracts from the employee's ability to perform their duties objectively.

Employees must disclose any potential conflicts promptly to their immediate supervisor or the designated Ethics Officer.

5. Declaration of Interests

In order to maintain transparency, all employees are required to declare any interests personal, financial, or otherwise that might affect their decision-making or could be perceived as a conflict of interest. Declarations should be submitted to the Human Resources department and updated periodically. These records are maintained confidentially and reviewed to ensure fairness in all business dealings.

6. Corporate Opportunities

Employees are prohibited from exploiting business opportunities for personal gain when such opportunities are related to HypeX Digital's operations in digital services, marketing, or online advertising. Any potential opportunity that could benefit the company must be brought to the attention of management and handled through the proper channels.

7. Social Media and Digital Conduct

Given the critical role of digital presence in our business, employees must:

- Represent HypeX Digital professionally on all digital and social media platforms.

- Ensure that any public communications are accurate, respectful, and in line with the company's values.
- Refrain from sharing confidential or proprietary information through personal or professional digital channels.
- Adhere to ethical guidelines in digital advertising and online interactions to maintain a trustworthy public image.

8. Data Privacy, Cybersecurity, and Confidentiality

Protecting the digital assets and sensitive information of HypeX Digital, our clients, and partners is of utmost importance. Employees must:

- Safeguard confidential information and digital data at all times.
- Adhere to best practices in cybersecurity and comply with Sri Lankan data protection laws.
- Use company resources only for authorized purposes and ensure that any digital communication complies with confidentiality protocols.
- Immediately report any data breaches or cybersecurity incidents to the relevant department.

9. Compliance with Laws, Rules, and Regulations

All employees are required to comply with all applicable laws, rules, and regulations governing our business, including those specific to digital services, online marketing, and data privacy. An in-depth understanding and adherence to these legal requirements are expected to prevent legal risks and protect the company's reputation.

10. Reporting Unethical or Illegal Behavior

Employees are encouraged to report any actual or suspected violations of this Code or relevant laws. Reports can be made confidentially to a supervisor, the Human Resources department, or the designated Ethics Officer. HypeX Digital commits to thoroughly investigating all reports and taking appropriate corrective action. Retaliation against anyone reporting concerns in good faith is strictly prohibited.

11. Waivers

Any waiver or deviation from the provisions of this Code must be approved in advance by the Board of Directors or the designated authority. Such waivers must be documented in writing and are subject to periodic review.

12. Annual Acknowledgement and Signoff

All employees are required to review this Code of Conduct and Ethics upon commencing employment. By continuing to work at HypeX Digital (Pvt) Ltd, it is understood that you agree to

the terms of this policy. Each year, the policy is automatically renewed through an annual acknowledgement process, confirming that you have read, understood, and will abide by the Code. This ongoing acknowledgement is a clear demonstration of your commitment to upholding the highest standards of ethical business practices.