

GALACTIC ADVANCE ENGINEERING (M) SDN. BHD.

Code of Ethics

Consistent with Galactic Advance Engineering (the Company)'s history of integrity and good governance; its Management and Employees are committed to conducting business in accordance with the highest ethical standards. This Code of Ethics (this "Code") sets forth policies which embody these standards.

Fair Dealing

Each employee should endeavour to deal fairly with the Company's customers, suppliers, competitors and employees. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice.

Conflicts of Interest

GALACTIC trusts its Management and Employees to be conscientious and loyal in representing the Company and in using and conserving its resources. They should report any personal interests or obligations which could conflict with the conscientious performance of their duties or create any suspicion or perception that decisions they make for the Company might be improperly influenced by their personal interests.

Management and Employees are prohibited from: -

- a) taking for themselves, personally, opportunities that are discovered through the use of Company property, information or position;
- b) using Company property, information or position for personal gain; and
- c) competing with the Company

Management and Employees owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises. They should not accept gifts or favours that could compromise their loyalty. In addition, except where credit is extended as part of the ordinary course of business of the

Company, loans to, or guarantee of personal obligations of, Employees and Management are prohibited.

Employees should always report potential conflicts of interest to Managers or directly to the Chief Executive Officer (CEO) of the company.

Protection of Company Assets

All Employees should protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability. All Company assets should be used for legitimate business purposes.

Confidential Information

Proper management of confidential information by Management and Employees is very important to the Company. Loyalty to the Company includes commitment not to use or give to others trade secrets or confidential information belonging to the Company or belonging to others with whom the Company does business for/with. Confidential information includes any information not known to outsiders that has value to the Company or whose premature disclosure would help competitors or be harmful to the Company. In addition, Management and Employees are prohibited from using or attempting to use "inside" Company information for their own personal use, gain or advantage; or providing or "tipping" it to others.

Integrity and Disclosures

Management and Employees will meet the highest standards of honesty, truthfulness and integrity in all communications, not just because it is good business, but because it is right. This applies in all our dealings, both as a Company and in our relationships with each other. We will abide by the laws that govern the states and countries where the Company operates. The Company will provide a working environment in which adherence to these high standards is clearly expected of all employees, and integrity is never compromised by pressures for immediate success.

To maintain the integrity of our system of accounting and internal control, the Company's accounting and financial records must be valid, accurate and complete. All transactions should be accurately and promptly recorded in the Company's books. The CEO, the Chief Financial Officer (CFO) and the

Accounting Department Staff of the Company shall foster practices and procedures which ensure compliance with all applicable laws and regulations.

Reporting Violations of the Code or Applicable Law

If Employees become aware of actions in violation of this Code or applicable laws, rules and regulations, they should contact their immediate supervisor, their unit or department manager or, if they wish, the CEO.

Accountability for Adherence of this Code

Management and Employees will be held accountable for adherence to this Code. Employees who violate the Code will be subject to disciplinary action, including potential termination of employment, depending upon the particular circumstances involved. Information regarding possible infringement of the Code will be referred to the Chief Executive Officer for handling as appropriate to the circumstances.
