



TakeMarket Ltd

Code of ethics

Amended 5th January 2019

TakeMarket Ltd, (the "Company"), seeks to promote ethical conduct in its financial management and reporting and common business practice. This Code of Ethics applies to any Executive Officer, and employee.

Each Senior Officer and employee shall:

1. Act ethically and with honesty and integrity, including by ethically handling actual or apparent conflicts of interest between personal and professional relationships and applicable laws, rules and regulations.
2. Senior officers shall provide the Board of Directors with information that is full, fair, accurate, objective, relevant, timely and understandable.
3. Comply with laws, rules and regulations of the UK overseas territory of Gibraltar, governments and regulatory agencies, such as the Gibraltar Company house & Gibraltar Financial Services Commission.
4. Act in good faith, responsibly, with due care, competence and diligence, without misrepresenting facts or allowing his or her independent judgment to be subordinated. Take care of our customers, end-users, partners and co-operating parties with honesty, respect and act ethically in all situations when interacting with these parties.
5. Every member of the staff shall respect the confidentiality of information acquired in the course of his or her work at the Company except when authorized or otherwise legally obligated to disclose or use such information. Confidential information acquired in the course of his or her work will not be used for personal advantage.
6. Share knowledge and maintain skills important and relevant to the Company's needs.
7. Proactively promote ethical behavior within the Company. Promote responsible use of and control over all Company assets and resources.
9. Disclose information required to be included in periodic reports filed to be provided to any other governmental entity in a full, fair, accurate, timely and understandable manner.



10. Comply with all Company policies, published either on our website or internally distributed.

11. Report violations:

- I. Promptly report any violation or possible violation of this Code of Ethics, including any information concerning (a) significant or material deficiencies or weaknesses in the design or operation of the internal controls of the Company,
- II. Any fraud, whether or not material, involving any member of management or other employee who has a significant role in financial reporting, disclosures or internal controls of the Company,
- III. Or any other matters that could have a material adverse effect on the Company's ability to record, process summarize and report financial data. The report must be made to the board of directors, as the case may be, in accordance with the procedures established under the Company's Corporate Compliance Policy, if any, which include reporting on a confidential or anonymous basis.
- IV. The company think it is important that employees can report wrong doing by their peers and co-workers and such the company promotes and encourage internal whistle blowing to be reported to the CEO or/and the Board.

This Code of Ethics does not summarize all laws, rules, regulations and Company policies applicable to the Senior Officers and staff members. Violations of this Code of Ethics may subject a Senior Officer to disciplinary action, ranging from a reprimand to dismissal and possible criminal prosecution.