



Code of Business Conduct

Prepared and Addressed for:

Members and Representatives of REALTYGY

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1. Preamble

REALTYGY is steered by its *purpose, mission, vision, and values*:

PURPOSE

To rationally enable our clients for making a beneficial stake in real estate.

VISION

To be the most wise and reliant solution provider in the real estate market.

MISSION

To enlighten, steer and continuously improve the portfolio of our client's real estate investments.

VALUES

Agile consultants who are dedicated to aid our clients in their realty expedition.

2. Scope

REALTYGY's Code of Business Conduct serves the following four main purposes:

1. The Code affirms ethical obligations of employees belonging to REALTYGY partners, consultants, employees, apprentices and visiting professionals.
2. The Code sets out professional practises in terms of providing real estate consultancy services and clarifies various aspects of ethical obligations that members and representatives of REALTYGY hold.
3. The Code functions as an ethical guide to our business conduct and to any decision-making process involved.
4. The principles and standards set out in The Code serve as the basis for possible enquiries and ethical disputes concerning our representative's professional practice.

REALTYGY's Code of Business Conduct addresses the following areas:



The Code of Business Conduct are based on the ethical principles of honesty, integrity, competence, service, respect and responsibility set out by the world's leading professional body – Royal Institute of Chartered Surveyors (RICS), recognised and responsible for setting global qualifications and standards in land, property infrastructure and construction. The stipulated Code of Business Conduct is also in compliance to the International Ethics Standards (IES) set out by the International Ethics Standard Coalition (IESC).

The nature of REALTYGY's broad range of services, areas of expertise and works carried out in collaboration for its clients or customers (both locally and internationally) may be faced with ethical predicaments that can be consequently complex to resolve. The professional response by members or representatives of REALTYGY must be diligently consistent with terms set out in this Code of Business Conduct. REALTYGY's Code of Business Conduct provides a framework for developing an ethical and value-oriented professional practice; and shall be the initial guide to approach arising situations irrespective of the fact that resolving ethical issues is a convoluted process.

Our members and representatives are likely to engage in a conscientiously considered decision-making process and assess the context of each situation. They are also expected to work in collaboration with people and organisations, and take decisions that strengthen and empower them. REALTYGY holds the responsibility to introduce Code of Business Conduct to new members or representatives since reading, understanding, signing, following and complying with applicable laws and regulations are endured by all members and representatives.

An infringement of the standards and principles provided herein does not necessarily constitute a legal liability or violation of the law; such action is established in legal and judicial proceedings.

2.1. Consultancy Business

REALTYGY is a real estate consultancy business. We work with several types of individuals and organisations who require sound advice and solutions in real estate whilst empowering our professionals to achieve it. At REALTYGY, we are obliged to:

1. Conduct business in an honest, fair, transparent and professional manner;
2. Perform works with due skill, care and diligence, and ensure that all our members and representatives possess the necessary skills;
3. Ensure that our clients or customers are provided with a contractual agreement or terms of engagement (signed by both the parties) that are fair and clear. These shall meet all legal requirements and relevant codes of practice including reference to complaints-handling procedures and, where it exists, an appropriate redress scheme;
4. Avoid conflicts of interest by assessing whether there is a 'party', 'own interest' or a 'confidential information' conflict, and in cases where they do arise, we are obliged to identify and manage conflicts openly, fairly and promptly;
5. Not to discriminate unfairly in any form of dealings;
6. Ensure that all communications (both financial and non-financial subject matters) in all dealings with clients are fair, clear, timely and transparent.
7. Ensure that all advertising and marketing material is honest, decent and truthful;
8. Ensure that all money paid by client(s) are held in relevant corporate bank accounts;
9. Attain adequate and appropriate professional indemnity insurance or equivalent for agreed services;
10. Ensure that all obligations to each party is made clear throughout the process of performing the service;
11. Provide realistic assessment of the real estate market, likely selling, buying or rental price, associated cost of occupancy or of the likely financial outcome of any issues, using best professional judgement as part of the contracted service; and
12. Ensure that all meetings, inspections and viewings are carried out in accordance with the client's lawful and reasonable wishes, have due regard for the security and personal safety of all parties.

Our members and representatives seek opportunities to collaborate from all sectors on issues of common concern to contribute to a responsible and sustainable future. Our purpose drives us to constantly innovate and maximize impact on people, communities and the environment. We continually promote ethics, best practices and collective intelligence to progress towards a better world.

2.1.1. Social and Environmental

We consider our social, cultural, economic, and environmental impact as a vital measure of success for our business and prioritise it at par on the economic viability of the company. REALTYGY supervises and analyses its on-going social and environmental performance, and solicits specific feedback from its internal and external stakeholders. We cordially prioritise our effort to understand our own impact and use our learnings to improve our work without engaging in activities that are considered ‘green-washing’ or ‘brand-washing’.

2.1.2. Integrity

Our published reports are based on market evidence and construed by various data collection methodologies. We are honest about our deliverables to client and our impact as a consequence. We also continuously seek to increase accountability and transparency at all levels internally. Our members and representatives are obliged to act with honesty and fairness, and shall base their professional advice or solutions on relevant, valid and objective evidence closing any gaps that lead to disagreement or disputes.

2.1.3. Healthy and Fair Competition

We target to develop both an ethical climate and fair deal with clients, consultants, employees, visiting professionals, interns, trainees, competitors, suppliers, public institutions, media and the general public, while fostering a prosperous business environment. Members and representatives of REALTYGY respect the work and dignity of other professionals and will not submit service proposals to potential clients that may be seeking to secure pre-approved services through unethical public tendering. Our members proactively communicate the company's ethical standards on fair competition to its stakeholders. Our purpose to deliver solutions is compatible with a transparent, open and complementary role with competitors striving to achieve the same objective.

2.1.4. Recruitment

We strictly adhere to ethical recruiting practices that promote diversity and inclusion exclusive of unjustifiable discrimination. We embrace free and open competition for exceptional talent and we encourage professionals to work freely in the market upon identifying any conflicts of interest.

2.1.5. Fees and Payment

We apply our consultancy fees as specified in the contractual agreement with client (hourly-rate or lumpsum), and payment schemes to service providers, clients and any stakeholder that are respectful of their local legislation, contexts, needs and conditions of dignity.

2.1.6. Fiscal Duty

Our members and representatives are truthful, transparent and trustworthy in all their financial dealings. We are open and accessible as we do not mislead or attempt to mislead through misinformation or by withholding information as regards to the terms of service. We are obliged to present relevant documentary or other material in plain and intelligible language. We also do not engage in the practice of reducing or minimizing taxes through illegitimate finance practices such as invoices related to false expenses or the use of corporate shells.

2.1.7. Bribery, Corruption, Money Laundering and Terrorist Financing

We do not facilitate any financial crime inclusive of money laundering, tax evasion, bribery or corruption. We also do not offer or accept, directly or indirectly, anything that could constitute a bribe. We strictly comply with applicable laws governing bribery, corruption, money laundering and terrorist financing and ensure that these are followed. We are obliged to report any activity we are aware of that breaches anti-bribery, corruption laws, suspicion of money laundering or terrorist financing activities to the relevant authorities upon identification. Our business conduct is coupled with due diligence to perform periodic written evaluations of the risks that face the firm and that may lead to the facilitation of such prohibited activities. We also perform checks relating to identity and project specifics on clients and customers who we contract or deal with, and use reliance only where there is an appropriate level of confidence in the quality of the information provided by the third party.

2.2. Consultancy Relationship

We believe service quality is considered an important driver of perceived value and occupies a strategic position in all our business activities. As it is a critical indicator of our client's overall experience with our service, we primarily emphasise on continually enhancing our services through innovation and advanced practices to maintain our relationship with existing and prospective clients. We do this through our extensive knowledge-base and action-learning approach; whereby, we develop customised solutions, innovative methodologies with an emphasis on creating tools and practices that organisations can apply in the future. Our members and representatives actively attempt to understand the diverse contexts, cultural backgrounds, circumstances and interests of the clients, organisations and other professionals they work with. We respect diversity, local cultures, traditions, and economic differences.

2.2.1. Conflicts of Interest

Our members and representatives are loyal to our mission and respect of the agreements and relationship of trust that our company has built with external individuals and organisations. We are obliged to identify actual and potential conflicts throughout a professional assignment and do not provide advice or services where a conflict of interest or a significant risk of conflict arises. We exhibit effective internal processes to identify actual and potential conflicts of interest, to enable appropriate decisions to be made on whether to accept work, and to keep records of decisions made about actual and potential conflicts of interest.

2.2.2. Data and Documentation

REALTYGY generates, safeguards, and maintains necessary documentation for rendering professional services. Our members and representatives take reasonable steps to ensure that our documentation accurately reflects the services we provide. In addition, they also update the documents with any changes or amendments. All sensitive and confidential information is maintained for compliance with international and national law. We do not process personal data without the consent of its owner except in cases in which the processing is necessary to protect the public interest, or made available by the data owner, or for carrying out legal procedures and rights as required by law.

2.2.3. Consultancy Schedule

We work together with our clients to construe consultancy schedule that our consistent with their requirements, expectations, context and circumstances. We do not impose specific schedule or procedure because it is more conducive for REALTYGY. We, along with our clients or customers, routinely review consultancy schedules to assess their continued viability and effectiveness, respecting the client's interests, preferences, and priorities. Any form of disagreement or objection is further evaluated and communicated with all the parties involved.

2.2.4. Consultancy Support

In certain circumstances, our members and representatives are assigned to support on behalf of an identifiable and contractually agreed client to deliver solutions. They may also work towards elimination of systematic obstacles that restrain the client's progress and the capacity to resolve issues or concerns. Prior to engaging in such type of activities required by client, REALTYGY obtains the client's written consent and they are distinctly involved in every part of the process.

2.2.5. Gifts and Hospitality

We understand the challenges of accepting gifts and hospitality and recognize that such may be a token of respect and gratitude. When determining whether to accept a gift or hospitality from a third party, we consider the monetary value of the gift and context of the hospitality service, and whether it places us in a position of debt to someone. We ensure that gifts are nominal, legal, and exceptional. Gifts and hospitality over a stated value, received or accepted, are recorded to ensure that they are not being used for undue influence. Gifts and hospitality that are declined are also noted so we are aware of pressures our members and representatives may face, and in order to make it an open and transparent process for avoiding any accusations of distortion.

2.3. Confidentiality

Our members and representatives pursue to earn trust of other members and of third parties, namely clients, by creating an ongoing alliance, establishing and encouraging appropriate limits, and maintaining confidentiality. We hold the responsibility to respect and protect the confidentiality and privacy rights of other members, clients and suppliers by safeguarding confidential or sensitive information.

2.3.1. Information Sharing

We actively support development of knowledge and competency by sharing amongst our members and representatives to learn and implement best industry practices; however, when necessary, we understand the need to protect privileged, confidential, and internal information gained from an external client or organisation. In such circumstances, we aim to ensure that the confidentiality of external parties and client are maintained by our members and representatives, service providers and corporate partners.

2.3.2. Inter-organisational Project Groups

When cooperation between REALTYGY and another external organisation is involved, the client will be informed of the group's composition, sharing of necessary information, and the purposes of such cooperation. We are obliged to ensure respect for the client's confidentiality rights.

2.3.3. Monitoring and Recording

We obtain written permission from the client or any other person and/or organisation(s) prior to allowing any member or representative to observe activities or work sessions, recording sound and images at meetings or work sessions through electronic or alternative means. We jointly agree with relevant parties on the use and dissemination of any data or recordings and deliver relevant or agreed documents.

2.3.4. Publication and Transmission

Only upon formal written agreement or permission with client, we disclose or transfer documents to third parties in cases where exceptions to confidentiality exist. We may publish documents on our website as a resource for visitors that do not contain any confidential or sensitive information provided by our client.

2.3.5. Storage and Disposal

We maintain the essential documentation for performing our activity and rendering professional services. We ensure that files (both electronic and on paper) are stored in a secure place and that access is granted only to authorised personnel. We also store documentation following termination of services to ensure reasonable future access, internally. We are obliged to archive the client's documents and any sensitive material provided in a manner that protects the client's confidentiality.

2.4. Corporate Responsibility

REALTYGY is committed to meeting its social, environmental, economic, cultural, legal and ethical corporate responsibilities. We consider corporate social responsibility has a cumulative impact on all our existing processes, both directly and indirectly; whereby, we continuously strive to improve our practices through sustainable approach that positively impacts the environment and society. We also seek to apply practices and give preferences to suppliers whose practices are beyond minimum regulations requirement further representing excellent working conditions, comprehensive value-chains, respect for international human rights conventions and covenants, respect for the environment and genuine engagement with its stakeholders.

2.4.1. Advertising and Marketing

Our members and representatives are obliged to identify our company's credentials through authentic approach in order to avoid any false, misleading, deceptive or deceitful statements. We also routinely conduct internal trainings with respect to advertising and marketing our services, ethically.

2.4.2. Public Responsibility

We are accurate and honest in terms of reporting our activities and views to appropriate third parties or to the media as it is based upon appropriate literature, practice and evidence.

2.4.3. Discrimination and Exploitation

We are firmly against discrimination and exploitation of existing or prospective clients, students, employees, visiting professionals, apprentices, trainees or any other participants based on age, culture, disability, ethnicity, race, religion, gender, sexual orientation, marital status, language barriers, socioeconomic status, immigration status, and any other basis prohibited by law.

2.5. Professional Responsibility

We only provide services for which we are competent and qualified for. We ensure that our members and representatives engaged in delivering our services hold the necessary competency to do so. We are obliged to regularly reflect on the professional / international standards for our discipline, and shall continually evaluate our services which we provide to ensure that our practice is consistent with evolving ethical principles and professional / international standards. When providing advice and opinion in professional context, we do so honestly and objectively based on relevant and reliable evidence upon identifying, analysing, communicating, and validating internally.

2.5.1. Professional Qualification

Our members and representatives are to honestly represent their professional qualifications. They are to also accurately describe their professional accreditation, continuing education and specialised training. Only members and representatives with relevant educational degrees and / or professional accreditation relating to real estate are to perform the services we offer. Our members and associates are to clearly state such specifics using appropriate methodology wherever necessary.

2.5.2. Professional Competence

Our members and representatives regularly acquire specialised knowledge, expertise and maintain their professional competence in order to stay updated with the ongoing developments in the market. Performance is monitored to develop our personnel both personally and professionally for improving effectiveness, efficiency and ability to generate greater value. We are obliged to stay updated and comply with relevant legislations, codes of practice, and other professional / technical standards.

2.5.3. Promotion

Our members and representatives refrain from promoting other services in a tone that is deceptive, misleading or that disregards the client's requirements and circumstances.

2.5.4. Ethical Obligations

We routinely approach external organisations / institutions to clarify ethical concerns and in order to improve our ethical standards and principles of professional practice.

2.6. Resolving Ethical Issues

We strive to resolve ethical predicaments through an open and direct communication methodology where all parties are involved and can seek consultation internally or externally when necessary. We are responsible for holding our members and representatives to the highest ethical standards and are willing to take appropriate action to ensure its pertinence.

2.6.1. Code and the Law

It is our duty to ensure that our members and representatives are familiar with this Code and other relevant standards that construe this. As they make their commitment to this code, insufficient knowledge or misunderstanding of an ethical obligation is not an acceptable argument to defend a behaviour that is not in line with these ethical principles and standards. By any means of conflict where national and international law sets less strict standards than the ones set by REALTYGY, this Code shall prevail.

2.6.2. Suspected Violations

In case of any violation of an ethical standard, actions depending on the situation will be executed through appropriate channels respecting the client's confidentiality rights. We are obliged to terminate the relationship if the conflict persists upon failure of necessary corrections. If a third party identifies REALTYGY has violated this Code, REALTYGY will carry out the necessary investigation, independent audit and collude with all involved parties to resolve the suspected violation.



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