

Nobel Design Holdings Ltd Share Trading Policy

Purpose and Scope

Nobel Design Holdings Ltd (the “**Company**”) is in compliance with the various regulations set forth by the Listing Manual of the Singapore Exchange Securities Trading Limited and the provisions of the Securities and Futures Act (Chapter 289) with respect to dealings in the Company’s securities by its directors and employees. In this connection, the Company has adopted a Share Trading Policy (the “**Policy**”), the purpose of which is to assist directors and employees of the Company to avoid conduct amounting to “insider trading”.

Policy

The Policy applies to dealings in the Company’s securities traded on the Singapore Stock Exchange. Such dealings include subscription for, and acquisition and disposal of, the Company’s securities, as well as the entry into agreements to subscribe for or acquire or dispose of the Company’s securities. It also includes the advisement, procurement or encouragement for another person to trade in the Company’s securities.

For the purpose of the Policy, an “insider” includes all of the Company’s directors and substantial shareholders, as well as the officers and employees of the Company and its subsidiaries who are in possession of information that is not generally available and is materially sensitive in affecting the price of the Company’s securities.

There are certain periods in the year during which directors and employees of the Company should not deal in the Company’s securities given the heightened risk of actual or perceived insider trading. These periods are called “black-out periods”. Black-out periods occur each year during the period commencing one month before the full year results announcement or two weeks before the quarterly results announcement, and ending on the date of announcement of the results. In addition to these specific time periods, the Company Secretary or Board may declare other black-out periods from time to time.

The Policy dictates that during such black-out periods, aside from directors and employees, all parties considered as insiders of the Company must not deal in the Company’s securities or communicate directly or indirectly any materially price-sensitive information to anyone or cause such information to be communicated to anyone.

Further, the Company’s officers are to consult with the Group Finance Director or the Company Secretary before trading in the Company’s securities, and are to confirm annually that they have complied with and are not in breach of the Policy. Prior Board approval is required for trading by directors. Dealings in such securities by directors are also required to be reported immediately.

Strict compliance with this Policy is mandatory. Any breach of this Policy will be taken very seriously by the Company and disciplinary action, including possible termination of the breaching individual’s employment or appointment, may be undertaken.

Governance

The Board provides oversight for the Policy. The Company Secretary will review this Policy, as appropriate, to ensure the effectiveness of this Policy. The Company Secretary will discuss any revision that may be required, and recommend any such revision to the Board for consideration and approval.

Communication of Policy

The Policy shall be communicated to the Company's stakeholders, including but not limited to its employees, shareholders, suppliers, business partners and customers. The Policy shall be published on the Company website, which is accessible by the public.

Reporting

The Company Secretary shall report any incidence of insider trading to the Board for immediate action to be taken.