



Templeton Global Growth Fund Ltd (“Company”) Corporate Code of Conduct

In line with the Company’s values, the Board of Directors of the Company acknowledges the need for and requires the highest standards of ethical conduct to be observed at all times by all Directors, executive officers, agents service providers and employees (if any) of the Company.

The Board has accordingly adopted and expects all individual Directors, executives, officers, agents, service providers and other employees (if any) to observe the following standards to guide decision making and behavior:

- to act in accordance with the Company’s stated values.
- to act ethically and responsibly.
- to treat others with respect and not engage in bullying, harassment or discrimination.
- to deal with stakeholders fairly.
- to be committed to the highest standards of integrity, correctness and ethics.
- to be open and honest with each other at all times.
- to act at all times in the interests of the Company and use best endeavours to avoid activities or situations that may lead to conflicts of their private interests with their duties to the Company, and to ensure that the Board is informed of any conflict of interest that exists or could be perceived to exist between their private interests and their duties to the Company.
- to cooperate with one another in the best interests of the Company.
- to protect and preserve the confidentiality of information concerning the Company and its business which is of a confidential nature, except where reporting or disclosure is mandated or authorised.
- to use best endeavours to procure that the Company’s assets are protected and efficiently used for the Company’s legitimate business interests and refrain from improperly taking advantage of their position with the Company, or information or property of the Company, for personal gain or to compete with the Company.
- to recognise and respect the separate roles and responsibilities of the Board and management.
- to be diligent and strive to enhance the reputation and performance of the Company and deliver improved shareholder value.
- to observe and use best endeavours to procure observance of all legal requirements that affect the way the Company’s business is conducted (including without limitation, laws relating to dealing in securities, financial reporting, trade practices, fair trading, consumer protection, privacy, employment, equal employment opportunity and superannuation).
- to comply with and observe the Company’s Corporate Governance policies.
- to avoid behaviour that is likely to reflect badly on the Board or the Company.

Directors, executives, officers, service providers, agents and employees (if any) must not take advantage of property, information or position, or opportunities arising from these, for personal gain or to compete with the Company.

Anti-Bribery and Corruption Policy

In line with the Company values, the Company has a zero tolerance against bribery and corruption and acknowledges the serious criminal and civil penalties as well as reputational damage that may be incurred if the Company were to be involved in bribery or corruption. The Company has adopted the Anti-Corruption Policy of Franklin Resources, Inc. available publicly at www.franklinresources.com/corp/pages/generic_content/footer/anti-corruption_policy.jsf, which forms part of this Code of Conduct.

The Board requires all individual Directors, executives, agents, service providers and other employees (if any) to comply with this policy. Training of Franklin Templeton staff will be conducted by Franklin Templeton on a regular basis.

Reporting of breaches, monitoring and review

The Board expects that any Director, executive or other officer who becomes aware of a material breach of or failure to observe the forgoing standards by any person to whom they apply, will promptly bring that matter to the attention of the Chairman of the Board (or the Chair of the Audit and Risk Committee, if the person concerned is the Chairman of the Board).

The Company will review this code at least annually to check that it is operating effectively and whether any changes are required and conduct training as required.

Approved by the Templeton Global Growth Fund Ltd Board on 25 June 2021.