



INTEGRITY POLICY

To be adhered by GIC Group Pte Ltd and all its subsidiaries (collectively “GICG”) and their employees, agents, subcontractors and anyone acting on behalf of, or representing GICG (herewith as members of GICG).

1. INTRODUCTION

GICG believes the trust from its clients and stakeholders is the key to its success as an organisation and as an individual; and to sustain GICG brand and reputation, GICG recognizes the need to conduct its business honestly, transparently and fairly.

GICG is committed to uphold the principles of integrity and maintain the highest standard of professional behavior in the challenging environment in which its business operates.

As part of this commitment, GICG encourages an open culture where members of GICG can exchange ideas and information, seek advice, and raise concerns, without fear of retaliation. This will allow GICG to continuously strive to improve and preserve the confidence entrusted by its clients and stakeholders.

2. PRINCIPLES OF INTEGRITY

G: Goodness in honesty and transparency: be truthful in everything we do. No circumstances justify lies, deceit or a lack of truthfulness. We demand the highest ethical standard of ourselves and others.

I: Impartiality in fairness: we seek to deal fairly and respect for others. We avoid taking unfair advantage through manipulation, theft, concealment, abuse of confidential information, misrepresentation or other unfair practices. Our decisions will be guided by respect for principles and standards of good behaviour, not by arbitrary choices or personal preferences.

C: Constancy in accountability: take responsible of our actions and accept the consequences of our choice and do not blame others for our actions.

G: Guardian in our commitment to deliver trust: We deliver trust by guarding our clients' interests and contributing to their businesses so that the pride we feel in what we do is pride that has every right to be felt.

3. INTEGRITY OF SERVICES

Our services shall be delivered professionally and honestly in accordance with agreed criteria, requirements and procedures. GICG maintains its independence of judgment and does not surrender to pressure and inducements to misrepresent findings or alter the results of its audits, certifications, testing and/ or inspections. All findings shall be adequately and accurately



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documented and shall not be changed improperly. No untruthful or misleading reports or certificates shall be issued.

4. CONFLICTS OF INTEREST

In general conflicts of interest, or the possible appearance of a conflict of interest, shall be avoided. Members of GICG are required to sign a 'Confidentiality, Impartiality & Non-Conflict of Interest Agreement' and expected to declare to GICG as soon as they become aware that their personal interests may potentially conflict with the interests of GICG. A conflict of interest arises when the person's opportunity for personal gain could interfere with his/her judgment, objectivity, independence or loyalty to GICG. Conflicts of interest can arise in many ways, if in doubt, guidance should be sought with GICG. The person shall declare immediately in writing all such potential conflicts of interest to GICG and abstain from the decision-making process as long they are affected by a potential conflict of interest.

Some situations of conflicts of interest are forbidden to members of GICG.

These include but are not limited to the following:

- Personally offering or participating in any form of professional or consultancy services to a customer or prospective customer of GICG.
- Competing with GICG or working for a competitor of GICG.
- Obtaining a personal gain, by abusing a position within GICG or accessing GICG information.
- Personal investments in suppliers, competitors and customers
- Knowingly engaging the services of a supplier or sub-contractor of GICG in which an employee directly or indirectly has a significant shareholding or other financial interests is not permitted unless: (i) the potential conflict has been transparently declared to GICG and (ii) the employee affected by the conflict does not take part in the procurement process.
- Making a personal investment in a supplier, sub-contractor, competitor or customer of GICG is not permitted, unless by way of acquiring shares on a publicly traded stock exchange.

5. CONFIDENTIALITY

Members of GICG are required to sign a 'Confidentiality, Impartiality & Non-Conflict of Interest Agreement' which prohibits the disclosure of any information to third parties or in the public



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domain with which the members become acquainted during employment or engagement with GICG.

GICG has strict control in managing personnel data and it is addressed under 'GICG Guideline for General Data Protection'.

6. INTEGRITY OF FINANCIAL INFORMATION

All transactions shall be properly, accurately and timely reported and recorded. All financial related records shall be supported by proper documentation according to contract/ agreement/ policies/ issued by bona fide parties and shall be maintained in accordance with applicable laws.

GICG does not pay or offer any form of improper incentive to securing business for GICG.

Our accounting shall be accurate and unambiguous; and off-books accounting is prohibited.

7. BRIBERY AND CORRUPTION

GICG does not engage in bribery or corruption of any form, in any of the countries where it operates. No members of GICG shall promise, offer or pay, whether directly or indirectly, any bribe to any person in order to procure orders or to obtain any other benefit for GICG.

No employee of GICG shall, in the course of his or her duties, solicit or accept, whether directly or indirectly, any bribe from any person.

Members of GICG, shall not offer or make payments to government officials, whether directly or indirectly, or offer them any gift or entertainment with the aim of influencing their decision, or encourage them to secure an improper advantage for GICG. This applies equally to officers and employees of private entities. Any members of GICG who receives a demand for a bribe shall report the matter immediately to integrity@gicgrp.com.

8. GIFTS AND ENTERTAINMENT

No gift, hospitality or entertainment should be offered or accepted if they influence improperly or create the appearance of an improper influence on business decisions. Gifts, hospitality and entertainment shall not exceed what is usual in normal business relations. Any form of entertainment that could be damaging to the reputation of GICG shall be avoided. The following rules clarify the expected standard of behaviour of members of GICG.



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8a. GIFTS OFFERED TO MEMBERS OF GICG

The following shall not be accepted:

- Payment of cash, tips, loans or cash equivalent gifts from suppliers or customers.
- Any personal gifts, favours, entertainment or hospitality when those are given in connection with services performed by GICG.
- Employees involved in decisions on procurement or selection of suppliers shall not accept personal gifts offered by suppliers or prospective suppliers. Usual hospitality and entertainment, including participation in trade fairs and similar professional events which are sponsored by suppliers, is acceptable, subject to reporting and clearance obligations.

8b. REPORTING AND CLEARANCE OBLIGATIONS

Members of GICG are required to report and seek the prior approval of GICG Head of Respective Function before accepting any gift. If gifts received cannot be refused or returned without causing offence, the person receiving the gift should report to GICG Head of Respective Function for choosing a suitable method of disposal.

9. USE OF COMPANY ASSETS AND FUNDS

Members of GICG have a duty to safeguard and to use company assets and funds under their control appropriately. It is not permitted to use GICG assets or resources for any form of personal benefit or to perform work for an external party.

Company computers, network systems and electronic communication tools shall be used for professional purposes, in accordance with GICG IT policies. Use of e-mail, internet and other modes of electronic communication may be monitored and audited by GICG (when permissible under relevant privacy laws) when suspicion of abuse arises.

10. PROCUREMENT

Members of GICG in charge of purchasing goods and services from suppliers or selecting sub-contractors shall do so with the sole aim of securing the best overall value for such services, with due regard to supplier quality and reputation. Where appropriate, competitive offers shall be sought prior to selecting a supplier or sub-contractor. GICG does not award contracts to suppliers on the basis of personal preferences. Soliciting any form of personal advantages from a supplier or from a person seeking to offer services to GICG is strictly prohibited.



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11. FAIR MARKETING

Any means of communication/ presentations used for promoting GICG/ advertising GICG's services shall reflect accurate and correct information. This includes but not limited to the following:

- Internal and external presentations (e.g. sales power-points)
- Brochures, articles, publications
- Websites

Marketing shall be conducted in a manner that is truthful, non-deceptive, not misleading and consistent with applicable laws.

12. TRUTHFUL AND RESPECTFUL

Members of GICG are expected to treat their fellow members with respect; and shall always be mindful of the following when dealing with others:

- Treat others the way you would like to be treated.
- Always consider how your actions will affect others.
- Respect differences, care about others and do not discriminate against others on the basis of nationality, ethnic origin, age, sex, religious or political beliefs.

Members of GICG shall meet the health and safety duties and responsibilities at work. Members of GICG are expected to obtain approval from the superior for any absenteeism, leaving early or leaving half-way from works/ assigned duty.

13. NO TOLERANCE FOR VIOLATIONS

Any breach of the integrity policy, however small, that can harm GICG's reputation and brand will not be tolerated. Violations of the Policy will result in disciplinary action, including termination of employment/ relationship and criminal prosecution for serious violations.