

**SIA Engineering Company Limited Suppliers' Code of Conduct**

(Version 2 dated September 2024)

SIA Engineering Company Limited ("SIAEC") is committed to high standards of ethics and business conduct. We require our suppliers to not only comply with laws and regulations, but also integrate principles of sustainable development into all areas of their business. To this end, this Code of Conduct ("Code") sets out a non-exhaustive list of ethical and business conduct requirements that we require all our suppliers to comply with.

Non-compliance with this Code may affect the supplier's ability to continue its business relationship with SIAEC. SIAEC reserves the right to suspend or terminate any engagement with a supplier who fails to comply with this Code. SIAEC reserves the right to audit suppliers at any time to ensure compliance with this Code.

This Code may be amended from time to time and the latest version is available at <https://www.siaec.com.sg/suppliers.html>. This Code does not create any binding obligations on SIAEC.

Integrity is one of SIAEC's core values. We go out of our way to do the right thing, every time. We expect integrity not just from our employees, but also from our partners, suppliers, contractors and agents that we work with. You can play a part to help ensure that SIAEC, its subsidiaries and joint venture companies continue to be safe and ethical companies by reporting any knowledge of improprieties, malpractices, misconduct, wrongdoing or fraud via the following independent whistleblowing channels operated by Deloitte, our external service provider as follows:

SIAGroup_whistleblow@tipoffs.com.sg
(65) 3158 1087 (24-hour)

1. Compliance with Laws and Regulations

- 1.1. Suppliers' business operations, as well as all products and services supplied to SIAEC, must fully comply with the laws and regulations of the countries where suppliers' operations are based as well as from where goods and services are provided to SIAEC.
- 1.2. All financial and business records must be accurately maintained in compliance with applicable laws and regulations, as well as generally accepted accounting principles.
- 1.3. Fair competition must be practiced in accordance with local laws¹. Activity that restricts competition must be avoided. Commercial decisions, including prices, terms of sale, division of markets and allocation of customers, must be made independent of understandings or agreements with competitors.
- 1.4. Suppliers must respect the privacy of personal information of our employees and business partners and comply with all applicable laws and regulations on data protection².
- 1.5. Suppliers must not trade in the securities of SIAEC or any other company either directly or through an intermediary while in possession of inside information, relating to SIAEC or the other company. "Inside information" refers to information that is not generally available but, if it were generally available, a reasonable person would expect it to have a material effect on the price or value of securities or securities-based derivatives contracts of the relevant corporation.

¹ Including the Singapore Competition Act 2004.

² Including the Singapore Personal Data Protection Act 2012.



- 1.6. Suppliers must comply with all applicable laws and regulations when importing and exporting products, services, technology and information.

2. Ethics and Conflict of Interest

- 2.1. Suppliers are expected to adhere to high standards of ethical business behaviour and to act with integrity.
- 2.2. Suppliers must comply with the Singapore Prevention of Corruption Act 1960, and any and all other anti-corruption and anti-bribery laws in countries where they operate and from where they provide the relevant goods or services to SIAEC.
- 2.3. Without prejudice to paragraph 2.2, suppliers must conduct their business with integrity, transparency and honesty. They must not, whether themselves or through intermediaries, engage in any form of fraud, corruption, bribery, extortion or other behaviour involving the improper receipt of or offer of benefits.
- 2.4. Any situation that has actual, perceived or potential conflict of interest must be disclosed to SIAEC. Where there is doubt as to whether a conflict of interest has occurred or may potentially occur, suppliers should disclose the same to SIAEC. Any form of relationship between a supplier and SIAEC's competitor, distributor, supplier, or any other person or entity with which SIAEC has a business relationship must not interfere with the supplier's provision of products and/or services to SIAEC.
- 2.5. Any information used by suppliers in their business relationship with SIAEC that is either not public and/or proprietary must be protected against loss and infringement. Any disclosure or use of such information other than for officially stated purposes must first be authorised by SIAEC.

3. Workplace Health, Safety and Quality

- 3.1. Suppliers must have in place health and safety protection policies and management systems to provide a safe and secure working environment. They must be designed to promote the general health of employees and reduce work-related injury and illness. For example, protective equipment and tools must be provided and replaced/maintained regularly and the workplace should be free of pollution or toxic material.
- 3.2. The safety of all products and services must be ensured through appropriate policies, implementation and monitoring.
- 3.3. Policies and management systems must be developed to ensure that the quality of all products and services supplied to SIAEC are as specified in the relevant supply agreement.

4. Environment

- 4.1. Environmental management is a key parameter that SIAEC looks at when selecting its suppliers.
- 4.2. Local environmental laws and practices such as those pertaining to waste disposal, air emissions and pollution must be complied with. Suppliers must endeavour to minimise the impact of their operations on the environment, for example by demonstrating that they are reducing emissions, waste, energy and water consumption.



5. Diversity, Labour Standards and Human Rights

- 5.1. Suppliers shall uphold the human rights of its employees and treat them with utmost respect and dignity.
- 5.2. SIAEC is committed to recruiting and developing people regardless of their gender, race, ethnicity, religion, age, disability status or any other dimension of diversity. Suppliers' employees must not be subjected to discrimination based on race, national origin, ethnicity, religion, gender, age, marital status, disability or any other reason.
- 5.3. All of suppliers' employees must meet the local legal minimum labour age.
- 5.4. Forced, coerced, bonded, indentured, involuntary prison labour or otherwise must not be used by suppliers.
- 5.5. Suppliers' employees' standard working hours, maximum working hours, including considerations for voluntary overtime work, and the granting of leave of any form, must be in accordance with applicable local and/or national laws³.
- 5.6. Suppliers' employees' minimum wages, piece rates, overtime pay and other elements of compensation, including legally mandated benefits, must be in accordance with applicable local and/or national laws.
- 5.7. Suppliers shall endeavour to pay all compensation on time.
- 5.8. Suppliers shall respect the rights of employees to associate with trade associations and trade unions in accordance with applicable local and/or national laws.

6. Business Continuity Planning

- 6.1. Suppliers should have implemented plans to reduce the impact of business disruptions (including without limitation natural disasters, pandemics, terrorism, strikes, computer viruses, etc.) towards its employees' well-being and the environment in general.

7. Accurate Record-Keeping

- 7.1. Suppliers shall keep complete and accurate records for all business transactions and retain such records for at least the relevant duration as required by applicable laws. Suppliers shall ensure that no such records are altered to conceal or misrepresent any transactions of the supplier.
- 7.2. Suppliers should ensure that appropriate controls are put in place to ensure that all records are complete and maintained in accordance with the above.

8. Subcontractors and Other Service Providers

- 8.1. Suppliers' subcontractors and service providers who are involved in the supply of goods or services to SIAEC or its customers must also adhere to the principles set out in this Code. Suppliers shall engage with their subcontractors and service providers to obtain their commitment to this Code.
- 8.2. Suppliers must pay their subcontractors and service providers accurately and promptly.

³ Including the Singapore Employment Act 1968.



9. Communication, Documentation and Inspection

- 9.1. Suppliers' employees must understand the requirements of this Code, which must be made available in the local language, where necessary.