

# Code of Conduct

The Company has adopted a Code Of Conduct that applies to all employees. The Code sets out the principles to guide employees in carrying out their duties and responsibilities to the highest standards of personal and corporate integrity when dealing with our business partners, customers, suppliers, colleagues and the community.

As an employee, you are responsible to behave appropriately at work. We outline our expectations here but we trust you to always use your best judgment. Reach out to your manager or HR if you face any issues or have any questions. This guide is applicable to all employees.

The content of the guide covers:

1. **Compliance with the Law**
2. **Ethics**
3. **Workplace Health & Safety**
4. **Dress code**
5. **Company Property and Assets**
6. **Alcohol & Drugs**
7. **Obligation to maintain confidentiality of Confidential and Proprietary Information**
8. **Conflict of interest**
9. **Fraternization**
10. **Employment of relatives**
11. **Workplace visitors**
12. **Solicitation and distribution**
13. **Disciplinary Actions**
14. **Contact Information**

## 1. Compliance with the Law

- i. The Company will comply fully with the laws and regulations of Singapore and of all places where we operate, and international rules, social norms and internal rules, codes of practices, legal, regulatory and licensing requirements applicable to the different jurisdictions where it operates.
  - conducting proper accounting, financial reporting and tax reporting and payments in accordance with relevant laws and regulations.
  - ensure the safety of our facilities by observing the safety rules that we have registered regarding our facilities with relevant authorities.
- ii. The Company and do not tolerate illegal acts or violation of rules even if they are done for the benefits of The Company or individual.

## 2. Ethics

- i. Integrity and Honesty
  - Keep your promised and following through on commitments.
  - No tolerance for lying, fudging data, misrepresenting themselves or The Company or other acts that display contempt for the truth.
- ii. Embrace Diversity and Foster Inclusion
  - Treating everyone with fairness and respect irregardless of age, gender, ethnicity, religion, disability, sexual orientation, education and national origin.
  - The Company's diversity initiatives are applicable—but not limited—to our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of gender and diversity equity that encourages and enforces:
    - Respectful communication and cooperation between all employees.
    - Teamwork and employee participation, permitting the representation of all groups and employee perspectives.
    - Work/life balance through flexible work schedules to accommodate employees' varying needs.
    - Employer and employee contributions to the communities we serve to promote a greater understanding and respect for the diversity.
  - The Company will not tolerate any acts of discrimination and will investigate all complaints and incidents in a fair and timely manner.
- iii. Professionalism
  - Come to work with proper & appropriate attire.
  - Commitment to work leading to higher performance.
  - Accountability on achieving the goals and tasks set for you.
  - Manage your time to work efficiently.
  - Being on time
    - Be puncture for work or meetings.
    - Meeting deadlines for projects or reports.
  - Learning and development
    - be competence in your work
    - continuously learning & keep yourself updated on the field of your profession.
- iv. Teamwork
  - Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.
  - All employees must be open and clear in communication with their colleagues, supervisors or team members.
  - Give effective & constructive feedback
  - Giving credits to your team members to engage and encourage them. It will give them confident and make them proud of the work they have put in.

v. Justice

- Don't act in a way that exploits others, their hard work, or their mistakes. Give everyone equal opportunity and speak up when someone else doesn't.
- Be objective when making decisions that can impact other people
- Be sure that you can justify any decision with written records or examples. Seek and use the most objective methods in any case;
- If you suspect you may have an unconscious bias that influences your decisions, ask for help from HR.
- When exercising authority, be fair. Don't show favoritism toward specific employees and be transparent when you decide to praise or reward an employee.
- If you need to discipline an employee, be sure to have prepared a case that you can present to HR. You must not retaliate against employees or applicants (such as in cases when they've filed complaints) as this is forbidden by law.
  
- Be just toward customers or vendors, too. If you think our company was in the wrong in a specific instance, don't try to cover it up or accuse the other side. Discuss with your manager to find solutions that can benefit both sides

**3. Workplace Health & Safety**

The Company is committed to provide a healthy and safe work environment for employees, customers, business partners and visitors. Every employee has a personal responsibility to support this commitment

- i. Employees are obliged to carry out their work in a safe manner, without causing harm to themselves or others, and to report any potentially unsafe or unhealthy situations immediately. (*refer to our Workplace Harassment Policy*)
- ii. All employees must observe the rules of office security.

**4. Dress code**

- i. The Company's official dress code is Smart Casual. However, an employee's position may also inform how they should dress. If you frequently meet with clients or prospects, please conform to a more formal dress code. The Company expect you to be clean when coming to work and avoid wearing unprofessional clothes (e.g. workout clothes, sandals etc.)
- ii. As long as you conform to The Company's guidelines above, The Company don't have specific expectations about what types of clothes or accessories you should wear.
- iii. The Company also respect and permit grooming styles, clothing, and accessories that are dictated by religious beliefs, ethnicity, or disability.

**5. Company Property and Assets**

The Company wants to set some guidelines for using computers, phones, our internet connection, and social media to ensure security and protect our assets.

i. Internet usage

The Company's internet connection is primarily for business. But, you can occasionally use The Company's connection for personal purposes as long as you don't interfere with your job responsibilities. Also, The Company expect you to temporarily halt personal activities that slow down the internet connection (e.g. uploading photos) if you asked to.

ii. You must not use our internet connection to:

- Download or upload obscene, offensive or illegal material.
- Send confidential information to unauthorized recipients.
- Invade another person's privacy and gain access to sensitive information.
- Download or upload pirated movies, music, material, or software.
- Visit potentially dangerous websites that can compromise our network and computers' safety.
- Perform unauthorized or illegal actions, like hacking, fraud, or buying/selling illegal goods.

ii. Cell phone

The Company allows the use of cell phones at work. But, do ensure that your devices won't distract you from your work or disrupt the workplace. Here are a few simple rules:

- Use your cell phone in a manner that benefits your work (business calls, productivity apps, calendars.)
- Keep personal calls brief and use an empty meeting room or common area so as not to disturb your colleagues.
- Avoid playing games on your phone or texting excessively.
- Don't use your phone to record confidential information.
- Don't download or upload inappropriate, illegal, or obscene material using our corporate internet connection.

iii. Corporate email

- Email is essential to our work. You should use The Company email primarily for work, but we allow some uses of The Company email for personal reasons.
  - Work-related use. You can use your corporate email for work-related purposes without limitations. For example, you can sign up for newsletters and online services that will help you in your job or professional growth.
  - Personal use. You can use your email for personal reasons as long as you keep it safe, and avoid spamming and disclosing confidential information. For example, you can send emails to friends and family and download ebooks, guides, and other safe content for your personal use.
- General expectations  
No matter how you use your corporate email, The Company expect you to avoid:
  - Signing up for illegal, unreliable, disreputable, or suspect websites and services.
  - Sending unauthorized marketing content or emails.
  - Registering for a competitor's services, unless authorized.
  - Sending insulting or discriminatory messages and content.
  - Spamming other people's emails, including your coworkers.
  - use strong passwords and be vigilant in catching emails that carry malware or phishing attempts. If you are not sure that an email you received is safe.

iv. Social media

The guidelines to prevent careless use of social media either while using personal social media at work or representing The Company through social media.

- Using personal social media at work  
You are permitted to access your personal accounts at work. But, The Company expect you to act responsibly, according to our policies, and ensure that you stay productive. Specifically, we ask you to:
  - Discipline yourself. Avoid getting sidetracked by your social platforms.
  - Ensure others know that your personal account or statements don't represent The Company. For example, use a disclaimer such as "opinions are my own."
  - Avoid sharing intellectual property (e.g trademarks) or Confidential Information. Ask your manager or PR first before you share company's news that's not officially announced.
  - Avoid any defamatory, offensive, or derogatory content. You may violate The Company's anti-harassment policy if you direct such content towards colleagues, clients, or partners. (*refer to The Company's Anti-harassment Policy for details*)
- Representing The Company through social media  
If you handle The Company's social media accounts or speak on The Company's behalf, we expect you to protect The Company's image and reputation. Specifically, you should:
  - Be respectful, polite, and patient.
  - Avoid speaking on matters outside your field of expertise when possible.
  - Follow The Company's confidentiality and data protection policies and observe laws governing copyrights, trademarks, plagiarism, and fair use.
  - Coordinate with The Company's Marketing department when you're about to share any major-impact content.
  - Avoid deleting or ignoring comments for no reason.
  - Correct or remove any misleading or false content as quickly as possible.

v. Computers & any other asset (eg. Camara, Ipad)

If you are using or taking charge of equipments belonging to The Company, you are responsible to:

- avoid careless handling resulted in damaging the equipments.
- keep the equipments in a reasonably safe place.
- Ensure any software used is from authorised suppliers.
- Protect the password and not use anyone else's ID or password to access records.
- dutifully sign in/out (when required) into the log sheet provided if you are borrowing it.
- conduct periodic inventory check.
- report any lost of equipment immediately if it happens.

## 6. Alcohol & Drugs

- i. Drugs and/or alcohol can impair an individual's capacity to perform their job safely and efficiently. The use of such substances may result in injury or a threat to the well-being of an individual, colleagues, customers or members of the public.
- ii. You are expected to attend work in a fit state and is not to be under the influence of alcohol or drugs during working hours.
- iii. Involvement with the manufacture, possession, use, distribution, sale, purchase, or transfer of illegal drugs is strictly prohibited.

## 7. Obligation to main confidentiality of Confidential and Proprietary Information

- i. In the course of employment, you will or may have access to and become informed of confidential and proprietary information of The Company or its affiliates (the "**Confidential Information**") and such Confidential Information is and will remain at all times the property of The Company.
- ii. Confidential Information shall mean all information of any nature and in any form, whether written, oral or electronically, that is disclosed to or known to you as a consequence of or through employment with The Company, whether such information is developed by The Company or is submitted to us in confidence by third parties and shall include, without limitation:
  - any information concerning the business accounts, finance plans or strategies of The Company, its affiliates or of any customer of The Company or its affiliates;
  - any confidential report or research commissioned by or on behalf of The Company, its affiliates or any of their respective clients in connection with the business or affairs of The Company, its affiliates or any of their respective clients;
  - any trade secrets of The Company or its affiliates, including know-how and confidential transactions; and
  - any other information deemed confidential by The Company or its affiliates which has or may have come to the knowledge to you in the course of employment.
  - Confidential Information shall not include any information that was part of the public domain at the time of disclosure to you or becomes part of the public domain, otherwise than as a result of a direct or indirect disclosure by you.
- iii. Use Confidential Information only for the purposes of carrying out duties in The Company and not for any other purposes. During the continuance and after the termination of your employment, you will hold in strictest confidence and to exercise the utmost diligence to maintain the confidentiality of any Confidential Information or any other information as to the affairs, dealings and concerns of The Company or its affiliates. You shall use your best efforts to prevent the publication or disclosure of the same to any third party and shall not, during the continuance or after the termination of your employment, without the prior written consent of The Company:
  - use for the benefit or purposes for yourself or any other third party, any confidential information; or
  - directly or indirectly reveal, furnish, divulge or otherwise make known or available to any third party, any Confidential Information.

## 8. Conflict of interest

- i. A conflict of interest may occurs when your interests raise a question of whether your actions, judgment, and/or decision-making can be unbiased.
- ii. when you chooses personal gain over duties to The Company, or exploits your position for personal gain in some way.
- iii. For this reason, conflicts of interest are a serious issue for all everyone. The Company expect all employee to be vigilant to spot circumstances that create conflicts of interest, either for themselves or for their direct reports.
- iv. Following The Company's policies and always act in The Company's best interests. Whenever possible, do not let personal or financial interests get in the way of the job. If you are experiencing an ethical dilemma, talk to your manager or HR and The Company will try to help you resolve it.

## 9. **Fraternization**

Fraternization refers to dating or being friends with your colleagues. In this policy, “dating” equals consensual romantic relationships and sexual relations. Non-consensual relationships constitute sexual violence and we prohibit them explicitly.

### i. Dating colleagues

- If you start dating a colleague, we expect you to maintain professionalism and keep personal discussions outside of our workplace.
- You are also obliged to respect your colleagues who date each other.

### ii. Dating managers

- To avoid accusations of favoritism, abuse of authority, and sexual harassment, supervisors must not date their direct reports. This restriction extends to every manager above an employee.
- Also, if you act as a hiring manager, you aren't allowed to hire your partner for your team. You can refer them for employment to other teams or departments where you don't have any managerial or hiring authority.

### iii. Friendships at work

- Employees who work together may naturally form friendships either in or outside of the workplace. We encourage this relationship between peers, as it can help you communicate and collaborate. But, we expect you to focus on your work and keep personal disputes outside of our workplace.

## 10. **Employment of relatives**

- Everyone in The Company should be hired, recognized, or promoted because of their skills, character, and work ethic. The Company would not like to see phenomena of nepotism, favoritism, or conflicts of interest, so The Company will place some restrictions on hiring employees' relatives.
- To The Company, a “relative” is someone who is related by blood or marriage within the third degree to an employee. This includes: parents, grandparents, in-laws, spouses or domestic partners, children, grandchildren, siblings, uncles, aunts, nieces, nephews, step-parents, step-children, and adopted children.

## 11. **Workplace visitors**

If you want to invite a visitor to The Company's offices, please ask for permission from HR Manager first. When you have office visitors, you also have responsibilities. You should:

- Always tend to your visitors (especially when they are underage.)
- Keep your visitors away from areas where there are confidential records or sensitive equipment.
- Prevent your visitors from proselytizing your colleagues, gathering donations, or requesting participation in activities while on our premises.
- Anyone who delivers orders, mail, or packages for employees should remain at our reception

## 12. Solicitation and distribution

Solicitation is any form of requesting money, support, or participation for products, groups, organizations, or causes which are unrelated to the company (e.g. religious proselytism, asking for petition signatures.) Distribution means disseminating literature or material for commercial or political purposes.

The Company allow solicitation and distribution by non-employees in the workplace. As an employee, you may solicit from your colleagues only when you want to:

- i. Ask colleagues to help organize events for another employee (e.g. adoption/birth of a child, promotion, retiring.)
- ii. Seek support for a cause, charity, or fundraising event sponsored, funded, organized, or authorized by our company.
- iii. Invite colleagues to employee activities for an authorized non-business purpose (e.g. recreation, volunteering.)
- iv. Ask colleagues to participate in employment-related activities or groups protected by law (e.g. trade unions.)

In all cases, The Company ask that you do not disturb or distract colleagues from their work.

## 13. Disciplinary Actions

The company may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our **Code Of Conduct**. Disciplinary actions will vary depending on the violation.

Possible consequences include:

- xiv. Reprimand.
- xv. Suspension or termination for more serious offences.
- xvi. Detraction of benefits for a definite or indefinite time.
- xvii. Legal action in cases of corruption, theft, embezzlement or other unlawful behavior.