

QEHS SYSTEM PROCEDURE

CODE OF CONDUCT

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FONG LEONG ENGINEERING PTE LTD

CODE OF CONDUCT

DOCUMENT NO:
FLE-QEHS-10

REV.
01

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Introduction to Codes of Conduct and Policies

Why do we have a code?

Our organization is committed to fostering an environment of ethical conduct, integrity, and compliance in all aspects of our operations. The Code of Conduct and Policies serves as a guiding framework, outlining the principles and standards that every member of our organization, including employees, contractors, and suppliers, is expected to adhere to. This Code is not just a set of rules but reflects our core values and commitment to responsible business practices.

Who is required to follow our code?

The Code applies to all individuals associated with our organization, including but not limited to:

- Employees at all levels
- Contractors and subcontractors
- Suppliers and vendors
- Clients and customers
- Any other party engaged in business activities with our organization
- Everyone within our organizational ecosystem is expected to understand, respect, and comply with the principles outlined in this Code.

Value

Operational Excellence

At the heart of our organizational ethos lies the unwavering commitment to operational excellence. This entails the continuous pursuit of the highest standards in our processes, methodologies, and overall execution, ensuring that every facet of our operations aligns with best practices in the industry. Operational excellence serves as the guiding principle that propels us towards continual improvement and a relentless pursuit of efficiency, quality, and innovation.

Integrity

Integrity forms the bedrock of our corporate character. We steadfastly adhere to the highest ethical standards, upholding honesty, transparency, and accountability in all our interactions and endeavors. Our commitment to integrity transcends compliance; it is a fundamental aspect of our organizational culture, influencing every decision and action to maintain the trust and confidence of our stakeholders.

Partnership and People Focus

Central to our ethos is a dedicated focus on partnership and people. We recognize that our success is intricately tied to the strength of our collaborations and the well-being of our workforce. Embracing a partnership mindset, we actively cultivate relationships with clients, suppliers, and the community, fostering a collective approach to shared success. Simultaneously, our people focus extends beyond conventional human resource practices, prioritizing the holistic well-being, development, and engagement of our employees as integral contributors to our shared goals.

Responsibility

Responsibility is not just a word; it is a guiding principle that shapes our actions and decisions. We recognize the broader impact of our operations on the environment, society, and stakeholders. Therefore, we embrace a sense of responsibility that extends beyond mere compliance with regulations. It involves proactively addressing our environmental footprint, contributing to social betterment, and ensuring the safety and well-being of all those affected by our activities.

Sustainability

Sustainability is a foundational pillar of our corporate identity. We are committed to sustainable practices that harmonize economic viability, environmental stewardship, and social responsibility. This commitment involves adopting eco-friendly technologies, minimizing waste, and contributing to the communities in which we operate. Our pursuit of sustainability is rooted in the understanding that the longevity of our industry and our company is inseparable from the health of the planet and the well-being of future generations.

Overview of the Codes of Conduct and Policies

Our Codes of Conduct and Policies encompass a comprehensive set of guidelines addressing various aspects of our business operations. These include:

- Employee Code of Conduct
- Recruitment Policy
- Supplier Code of Conduct
- Procurement Policy
- Child Labor
- Human Right Policy
- Standard of Conduct in Business Transactions
- Construction Business Standards Policy
- Accident and Injury Prevention Policy
- Environmental & Sustainability Policy
- Trade Secrets and Company Information Policy

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- Public Affairs Policy
- Whistleblowing Policy

Each policy is designed to ensure that our operations are conducted ethically, responsibly, and in compliance with relevant laws and regulations.

Importance of Compliance

Compliance with the Codes of Conduct and Policies is paramount to:

- Uphold our corporate reputation
- Foster a positive and ethical work environment
- Ensure fair and lawful business practices
- Mitigate legal and financial risks
- Demonstrate our commitment to corporate social responsibility

Legal Framework: What Law Do I Need to Follow?

Our Codes of Conduct and Policies are aligned with applicable local and international laws.

All individuals associated with our organization must be aware of and comply with these legal frameworks.

As a result, our business activities are subject to the laws of many different jurisdictions. We are each responsible for following all of the laws that apply to our businesses. At times, you may encounter a conflict between various laws that apply to our business activities. If you encounter a conflict or have any concerns about whether something is legal, please contact the Legal guidance from management.

How do I ask questions and raise concerns?

Open communication is encouraged, and individuals are urged to voice any questions or concerns regarding the interpretation or application of the Codes of Conduct and Policies. The following channels are available:

- Directly approach your supervisor or manager
- Utilize the designated grievance mechanism outlined in each policy
- Contact the designated compliance officer or legal department
- Utilize the whistleblower protection mechanism for confidential reporting

- No question or concern is too small, and we are committed to addressing and resolving issues transparently and fairly.

Employee Code of Conduct

Reporting Violations and Whistleblower Protection

Employees are integral to maintaining the integrity of our organization. We encourage a culture of openness and accountability. If an employee becomes aware of any violation of the Code of Conduct or observes unethical behaviour, they must report it promptly. Whistleblower protection is assured, ensuring that individuals reporting in good faith will not face retaliation. Reports can be made through designated channels, including anonymous reporting mechanisms.

Conflict of Interest

Employees are expected to act in the best interests of the company and avoid situations where personal interests may conflict with those of the organization. Any potential conflict of interest must be disclosed promptly to the management to ensure transparency and appropriate resolution.

Ethical Behavior

Maintaining the highest standards of honesty and integrity is crucial for our organization's success. Employees are expected to conduct themselves ethically in all business dealings, both within and outside the company.

An employee should not accept gifts or favors that could compromise their impartiality or create a perception of impropriety.

Core Business Principle

Our core business principles reflect our commitment to sustainable and responsible practices. Employees should align their actions with these principles, including environmental stewardship and compliance with all applicable laws and regulations.

Ensuring that all waste generated on construction sites is disposed of in an environmentally friendly manner.

Confidentiality and Data Protection

Respecting and safeguarding confidential information and proprietary data is crucial. Employees must adhere to data protection regulations to protect the privacy and rights of individuals and the organization.

Ensuring that client information and project details are not shared with unauthorized individuals or competitors.

Equal Opportunities

Our organization is dedicated to providing equal opportunities to all employees, regardless of their background. Discrimination in any form, including hiring, promotion, or compensation, is strictly prohibited.

Allowing every employee an equal chance to participate in training and development programs.

Harassment

A workplace free from harassment is a fundamental principle. Harassment, including but not limited to sexual harassment, bullying, or discrimination, will not be tolerated.

Creating awareness campaigns to educate employees about what constitutes harassment and how to prevent it.

Grievances

A transparent grievance mechanism is in place for employees to address concerns or disputes. This mechanism ensures fair and prompt resolution, promoting a healthy and transparent work environment.

Allowing employees to submit written grievances that are thoroughly investigated by HR to reach a fair resolution.

Exploitation

Exploitation, including forced labor or any violation of labor laws, is strictly prohibited. Employees are entitled to fair wages and working conditions by applicable laws. Ensuring that overtime work is voluntary and compensated according to labor regulations.

Safe, Healthy, and Secure Working Environment and Conditions

Our organization is committed to providing a safe and healthy working environment. Employees are expected to adhere to safety protocols and report any unsafe conditions promptly.

Organization/Management and Responsibilities

Management at all levels is responsible for the effective implementation and enforcement of the Employee Code of Conduct. Managers are accountable for ensuring that their teams understand and comply with the Code.

Training

Regular training sessions will be provided to employees to familiarize them with the Code of Conduct and its updates. Training ensures a clear understanding of expectations and fosters a culture of compliance.

Raising Concerns and Seeking Guidance

Employees are encouraged to seek guidance on ethical concerns and report potential violations through established channels. The organization is committed to addressing concerns promptly and confidentially.

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Internal Controls

Internal controls will be in place to monitor and assess compliance with the Employee Code of Conduct. Regular audits and assessments will ensure ongoing adherence and identify areas for improvement.

Conducting periodic reviews of employee conduct, with a focus on potential conflicts of interest and adherence to data protection policies.

Disciplinary Action

Violations of the Code may result in disciplinary action, up to and including termination of employment. The severity of the action will depend on the nature and repetition of the violation.

Implementing a progressive disciplinary system that includes verbal warnings, written warnings, and, if necessary, termination for serious violations.

Legal Rights and Obligations

Employees are informed of their legal rights and obligations under the Employee Code of Conduct. Legal recourse is available for employees who believe their rights have been violated.

Ensuring that employees have access to legal counsel if they need to address potential violations or disputes related to the Code of Conduct.

Singapore Anti-Bribery Act

Employees must comply with the Singapore Anti-Bribery Act and are prohibited from engaging in any form of bribery or corrupt practices. The organization has a zero-tolerance policy towards bribery.

Providing training sessions specifically focused on the provisions of the Singapore Anti-Bribery Act and real-world scenarios to illustrate compliance expectations.

Employees are to refer to the internal document of “**FLE-OCP-03**” as a reference.

Recruitment Policy

Fair and Transparent Hiring Practices

To ensure a level playing field for all potential candidates, our organization is committed to conducting recruitment processes with utmost fairness and transparency.

This means that every candidate, regardless of internal or external status, will be evaluated based on consistent and objective criteria directly relevant to the position. The transparency in our recruitment procedures extends to providing candidates with a clear understanding of the various stages involved, the expectations, and the specific selection criteria employed.

Compliance with Local and International Laws

Our recruitment policy is intricately woven into the fabric of compliance with both local and international laws governing employment practices.

This encompasses meticulous adherence to anti-discrimination laws, the promotion of equal opportunities, and a comprehensive understanding and application of specific labor laws relevant to the jurisdictions where our operations unfold.

Regular legal reviews form an integral part of our commitment to staying abreast of the latest updates in employment legislation, ensuring the perpetual alignment of our practices with evolving legal standards.

Due Diligence on Recruitment Agencies

When engaging with external recruitment agencies, we undertake a rigorous due diligence process.

This process is designed to ascertain that these agencies not only uphold ethical and legal standards but also possess a demonstrable track record of delivering fair, unbiased, and effective recruitment services.

Our due diligence includes an assessment of their code of conduct, a review of past client feedback, and an evaluation of their alignment with prevailing industry standards.

Anti-Corruption Measures in Recruitment

Rooted in our unwavering commitment to integrity and fair business practices, our recruitment policy explicitly prohibits any form of corruption throughout the recruitment process.

This encompasses a strict prohibition on bribery, kickbacks, or any other form of corrupt practices.

As a proactive measure, all employees involved in recruitment will receive comprehensive training on recognizing, reporting, and preventing corrupt practices.

Periodic audits serve as a robust mechanism to ensure ongoing compliance with our anti-corruption standards.

Diversity and Equal Opportunities

Our commitment to fostering an inclusive and diverse workplace is embedded in the fabric of our recruitment practices.

Beyond legal compliance, we actively seek to attract candidates from varied backgrounds and demographics.

This commitment extends to providing equal opportunities for all candidates, irrespective of their gender, race, age, or any other characteristic protected by law.

We set clear diversity goals for each recruitment cycle and incorporate language in job advertisements encouraging applications from candidates of all backgrounds.

Advertising of Positions

A critical element of our recruitment strategy involves the comprehensive advertising of all job positions.

This entails both internal and external channels to ensure maximum visibility and outreach.

We aim to reach a diverse pool of qualified candidates, and we strategically utilize our company website, relevant job portals, and professional networks for this purpose.

Job Descriptions & Person Specifications

To facilitate a transparent and effective recruitment process, we prioritize the creation of clear and accurate job descriptions and person specifications for each position.

These documents serve as comprehensive guides, outlining the specific skills, qualifications, and experience required for successful candidates.

Internal & External Recruitment

Our commitment to internal career progression is seamlessly integrated into our recruitment policy.

We actively consider internal candidates alongside external candidates for job vacancies. This approach not only ensures equal opportunities for professional growth within the company but also encourages a sense of loyalty and commitment among our existing workforce.

Electronic Recruitment

Embracing modern technological advancements, our recruitment process leverages electronic platforms for enhanced efficiency and accessibility.

This includes online application systems, virtual interviews, and electronic document management.

This strategic approach not only streamlines the process but also ensures accessibility for candidates, irrespective of their geographic location.

Recruitment Agencies

In cases where we engage external recruitment agencies, we establish clear guidelines and expectations.

These encompass ethical practices, thorough candidate screening, and stringent information confidentiality.

Contracts with recruitment agencies are crafted to explicitly include clauses addressing their alignment with our organization's values and policies.

Shortlisting

The shortlisting of candidates is conducted based on predefined and objective criteria, ensuring a fair and consistent evaluation process.

This approach minimizes biases and promotes a merit-based selection process.

Interviews

Our interview process is meticulously designed to be conducted by trained and diverse panels. This ensures a comprehensive evaluation of candidates' skills, experience, and cultural fit.

Interviewers undergo training on fair and unbiased techniques, and structured interview questions are employed to maintain consistency.

Offer of Employment

Offers of employment are extended based on merit and in strict accordance with the terms outlined in the job description and employment contract. We aim to ensure transparency and clarity regarding salary, benefits, and other terms of employment.

Data Protection

The organization is deeply committed to safeguarding the personal data of candidates throughout the recruitment process. All data handling is conducted in strict adherence to relevant data protection laws. This includes transparent communication with candidates regarding the handling of their data from the outset of the recruitment process.

Singapore Employment Law 2023

Our recruitment practices are intricately aligned with the latest updates in Singapore Employment Law. This comprehensive alignment includes adherence to regulations governing details of employment, working hours and rest days, salary structures, leave and medical benefits, probationary periods, notice periods, contractual working hours, payment of overtime, provision of payslips, details of salary components (allowances, deductions, etc.), CPF contribution for permanent residents and Singaporeans, public holidays, sick leave, and annual leave entitlements. Regular reviews of employment contracts and policies are conducted to ensure perpetual compliance with the evolving landscape of Singapore Employment Law.

Supplier Code of Conduct

Commitment to Ethical Practices

Our organization places paramount importance on maintaining a steadfast commitment to ethical practices throughout our supply chain. This commitment extends beyond mere compliance with legal requirements and encapsulates a dedicated pledge to uphold the highest standards of ethical conduct in all business interactions.

Prohibition of Forced Labor and Child Labor

Our Supplier Code of Conduct unequivocally prohibits any engagement with suppliers who utilize forced labor or child labor. This commitment reflects our unwavering stance

against any form of exploitation in the workforce, aligning with international labor standards and human rights principles.

Respect for Human Rights

Demonstrating a profound respect for human rights is integral to our Supplier Code of Conduct. This entails treating every individual involved in our supply chain with dignity and fairness, ensuring that their fundamental human rights are upheld in every facet of our business relationships.

Anti-Corruption Measures

Our commitment to ethical business practices extends to a stringent stance against corruption. Suppliers are expected to conduct their operations with the utmost integrity and transparency, and any involvement in corrupt practices is expressly prohibited.

Environmental Sustainability

Environmental sustainability is a core tenet of our Supplier Code of Conduct. Suppliers are encouraged to adopt practices that minimize adverse environmental impacts and promote sustainable business operations. This commitment extends to responsible resource management and efforts to reduce the ecological footprint.

Monitoring and Reporting Mechanisms

To ensure the consistent adherence of our suppliers to the established Code of Conduct, a robust system of monitoring and reporting mechanisms is in place. This includes regular assessments, audits, and transparent reporting channels to promptly address any concerns or deviations from the prescribed ethical standards.

Unfair Business Practices

Our Supplier Code of Conduct explicitly prohibits unfair business practices, fostering an environment where suppliers engage in fair competition, transparent dealings, and equitable business relationships. This commitment extends to the prevention of monopolistic behavior and other practices that compromise fair market competition.

Data Privacy and Information Security

Upholding the privacy and security of data is a non-negotiable aspect of our Supplier Code of Conduct. Suppliers are expected to implement robust measures to protect sensitive information, ensuring compliance with data protection regulations and safeguarding against unauthorized access or breaches.

Conflict of Interest

The prevention of conflicts of interest is integral to maintaining the integrity of our supply chain. Suppliers are expected to disclose any potential conflicts promptly, and appropriate measures are taken to manage and mitigate such conflicts to preserve the objectivity of business interactions.

Labour

Our commitment to fair labor practices encompasses multiple dimensions. This includes:

- **Child Labour:** Absolute prohibition of child labor in any form throughout the supply chain, aligning with international conventions and standards.
- **Human Trafficking, Slavery, and the Right to Voluntary Labour:** A resolute stance against human trafficking and slavery, emphasizing the right to voluntary labor and fair employment practices.
- **Freedom Against Prejudice and Discrimination:** A commitment to fostering an inclusive and diverse workplace, free from prejudice and discrimination based on any protected characteristic.
- **Safe and Secure Workplace:** Ensuring a safe and secure working environment that prioritizes the health and well-being of all individuals within the supply chain.
- **Working Hours and Wages:** Adherence to reasonable working hours and fair wages, ensuring compliance with applicable labor laws and standards.
- **Freedom of Association:** Respect for the freedom of association, enabling individuals to engage in collective bargaining and participate in workplace associations without fear of reprisal.

Health and Safety

A paramount concern within our Supplier Code of Conduct is the assurance of health and safety in the workplace. Suppliers are expected to implement and uphold robust

health and safety measures, ensuring the well-being of workers and preventing occupational hazards.

Environment and Sustainability

Beyond a mere commitment to environmental sustainability, our Supplier Code of Conduct encourages suppliers to actively engage in sustainable practices. This includes minimizing environmental impact, adopting eco-friendly technologies, and contributing to broader efforts for a sustainable future.

Gifts and Gratuities

Our Code explicitly addresses the issue of gifts and gratuities, emphasizing the need for transparency and ethical considerations in dealings between suppliers and our organization. Strict guidelines are in place to prevent any form of undue influence or compromise in business relationships.

Law and Ethical Standards

Our commitment to ethical business practices is firmly grounded in supporting international principles and upholding the highest legal standards. We align with the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights, and the 1998 International Labour Organization Declaration on Fundamental Principles and Rights at Work.

This commitment is reinforced by adherence to national laws and practices, which include:

a) Singapore Employment Law 2021 - Employment of Children and Young Persons

Our Supplier Code of Conduct aligns with the Singapore Employment Law 2021, which permits the employment of children and young persons aged 13 to 16 years under specific conditions.

These conditions are strictly adhered to, ensuring compliance with legal requirements while prioritizing the well-being and development of young workers.

b) Prevention of Human Trafficking Act 2014 & Constitution of the Republic of Singapore - No Person Held in Slavery

Our commitment to human rights is unwavering, as reflected in our alignment with the Prevention of Human Trafficking Act 2014 and the Constitution of the Republic of Singapore.

These legal frameworks unequivocally declare that no person shall be held in slavery, and our Supplier Code of Conduct reinforces this prohibition, ensuring that our supply chain remains free from any form of slavery or human trafficking.

c) Employment Law - Compensation and Working Hours

Upholding the principles of fair compensation and reasonable working hours, our Supplier Code of Conduct reflects compliance with Employment Laws.

This includes ensuring that our suppliers adhere to regulations concerning compensation structures and working hour limitations and fostering an environment of fairness and respect for the well-being of workers.

d) The Industrial Relations Act Singapore - Regulation of Employer-Employee Relations

Our commitment to fair employer-employee relations is reinforced by adherence to The Industrial Relations Act Singapore.

This legislation guides the regulation of relations between employers and employees, emphasizing the importance of collective bargaining, conciliation, arbitration, and tripartite mediation in the prevention and settlement of trade disputes.

Our Supplier Code of Conduct integrates these principles to create a harmonious and equitable working relationship within our supply chain.

e) Employment Law - Diversity and Inclusion

Recognizing the value of diversity and inclusion, our Supplier Code of Conduct aligns with Employment Laws that promote workplace diversity.

This includes fostering an inclusive environment that celebrates differences, prohibits discrimination, and promotes equal opportunities for all individuals within the workforce.

Procurement Policy

Supplier Due Diligence

The foundation of our Procurement Policy lies in the thorough examination and assessment of our suppliers through comprehensive due diligence processes.

This involves meticulous scrutiny of their business practices, ethical standards, and compliance with legal and regulatory frameworks.

Ethical Sourcing

Ethical sourcing is a cornerstone of our Procurement Policy, emphasizing the procurement of goods and services in a manner that aligns with our organization's values and ethical principles.

This includes a commitment to fair labor practices, human rights, and social responsibility throughout the entire supply chain.

Environmental Considerations

Our commitment to environmental sustainability is woven into the fabric of our Procurement Policy.

This encompasses considerations such as minimizing ecological footprints, supporting resource recycling activities, and advocating for biodiversity preservation.

These efforts collectively contribute to a society in symbiosis with nature.

Anti-Corruption Measures in Procurement

Upholding the highest standards of integrity, our Procurement Policy includes stringent anti-corruption measures to safeguard against corrupt practices in all procurement activities.

This involves clear guidelines, employee training, and regular audits to ensure compliance.

Monitoring and Evaluation of Suppliers

To maintain the highest standards in our supply chain, our Procurement Policy emphasizes continuous monitoring and evaluation of suppliers.

This ongoing assessment ensures that our suppliers consistently meet our ethical, environmental, and quality standards, fostering a culture of continuous improvement.

Building and Strengthening Partnership Relations

Central to our Procurement Policy is the commitment to building and strengthening partnerships with our suppliers. This involves collaborative efforts aimed at creating superior works, promoting open dialogue, and fostering a spirit of cooperation that goes beyond transactional relationships.

Providing Opportunities for Fair and Free Competition

Our Procurement Policy actively promotes fair and free competition.

This commitment is realized through maintaining transparent transactions, demonstrating competitiveness, and ensuring compliance with antitrust laws.

This ensures a level playing field for all potential suppliers.

Observing Social Norms

Our Procurement Policy extends beyond legal compliance to actively observe and uphold social norms.

This includes strict adherence to laws and regulations, maintaining a strong sense of personal ethics, respecting human rights, eliminating associations with antisocial forces, and implementing a robust consulting and reporting system.

Maintaining Quality and Safety

Ensuring the highest standards of quality and safety is a non-negotiable aspect of our Procurement Policy.

This involves a meticulous approach to managing processes, from sourcing to delivery, to guarantee that our products and services meet or exceed established quality and safety benchmarks.

Contributing to Environmental Preservation

Our commitment to environmental preservation is realized through active contributions to a decarbonized society, promotion of resource recycling activities, advocacy for biodiversity preservation, and an unwavering dedication to preserving the environment in all our procurement endeavours.

Ensuring Market Competitiveness

Our Procurement Policy is designed to ensure market competitiveness through the promotion of technological development and the creation of new services.

This dynamic approach positions our organization as a leader, fostering innovation and staying ahead in a rapidly evolving market.

Establishing Flexible and Stable Supply Systems

In line with our commitment to sustainability, our Procurement Policy emphasizes the establishment of flexible and stable supply systems.

This involves building sustainable supply chains, developing contingency plans to respond to disasters, and implementing measures to address potential security threats.

Thoroughly Protecting and Managing Information

Information security is a paramount consideration within our Procurement Policy.

This includes robust measures to protect and manage information, support information security initiatives, and maintain a responsive system to address and mitigate potential incidents of information leakage.

Implementing Education and Training

To reinforce a culture of corporate social responsibility (CSR), our Procurement Policy includes a robust framework for education and training.

This encompasses continuous education on CSR principles, ensuring that our employees and partners are equipped with the knowledge and tools to implement ethical and sustainable procurement practices.

Child Labor Policy

Zero-Tolerance for Child Labor

Our commitment to the eradication of child labor is unequivocal, as articulated in our Child Labor Policy.

This policy enforces a zero-tolerance stance towards any form of child labor within our operations and supply chain, underscoring our firm commitment to ethical and responsible business practices.

Age Verification Procedures

Our pre-recruitment age verification procedures serve as a crucial step in ensuring compliance with legal age requirements.

This involves a meticulous assessment of the expected education level, skills, and experience required for each position, while also taking into account the minimum working age prescribed by applicable laws.

During-Recruitment Age Verification Procedures

The during-recruitment phase further reinforces our commitment to preventing child labor.

This involves a comprehensive set of age verification procedures, including scrutiny of ID photos, matching signatures, ensuring seals are intact, validating the date of issue, and verifying birth certificates, household registries, driver's licenses, voting cards, or work permits as applicable.

After-Recruitment Age Verification Procedures

Our commitment to age verification extends beyond recruitment to the post-recruitment phase.

After recruitment, age verification procedures include validating a valid labor contract, cross-checking with a copy of the worker's ID card, obtaining a recent photo (taken within the past six months), recording the date of employment, outlining the main tasks/position, and documenting the work schedule.

Education and Awareness Programs

Complementing our stringent age verification procedures, we actively engage in comprehensive education and awareness programs.

These initiatives aim to enlighten our employees, suppliers, and stakeholders about the grave consequences of child labor, emphasizing our collective responsibility to prevent and eliminate this egregious practice.

Reporting and Investigation Processes

Our Child Labor Policy is fortified by robust reporting and investigation processes.

This includes clearly defined mechanisms for reporting any suspicions or concerns related to child labor, ensuring swift and thorough investigations to address any identified issues.

These processes serve as a proactive measure to maintain the integrity of our commitment to child labor prevention.

This commitment is reinforced by adherence to national laws and practices, which include:

a) Singapore Employment Law 2021 - Employment of Children and Young Persons

Our Supplier Code of Conduct aligns with the Singapore Employment Law 2021, which permits the employment of children and young persons aged 13 to 16 years under specific conditions.

These conditions are strictly adhered to, ensuring compliance with legal requirements while prioritizing the well-being and development of young workers.

b) Prevention of Human Trafficking Act 2014 & Constitution of the Republic of Singapore - No Person Held in Slavery

Our commitment to human rights is unwavering, as reflected in our alignment with the Prevention of Human Trafficking Act 2014 and the Constitution of the Republic of Singapore.

These legal frameworks unequivocally declare that no person shall be held in slavery, and our Supplier Code of Conduct reinforces this prohibition, ensuring that our supply chain remains free from any form of slavery or human trafficking.

c) Employment Law - Compensation and Working Hours

Upholding the principles of fair compensation and reasonable working hours, our Supplier Code of Conduct reflects compliance with Employment Laws.

This includes ensuring that our suppliers adhere to regulations concerning compensation structures and working hour limitations and fostering an environment of fairness and respect for the well-being of workers.

d) The Industrial Relations Act Singapore - Regulation of Employer-Employee Relations

Our commitment to fair employer-employee relations is reinforced by adherence to The Industrial Relations Act Singapore.

This legislation guides the regulation of relations between employers and employees, emphasizing the importance of collective bargaining, conciliation, arbitration, and tripartite mediation in the prevention and settlement of trade disputes.

Our Supplier Code of Conduct integrates these principles to create a harmonious and equitable working relationship within our supply chain.

e) Employment Law - Diversity and Inclusion

Recognizing the value of diversity and inclusion, our Supplier Code of Conduct aligns with Employment Laws that promote workplace diversity.

This includes fostering an inclusive environment that celebrates differences, prohibits discrimination, and promotes equal opportunities for all individuals within the workforce.

Human Rights Policy

Upholding Universal Human Rights

Our profound commitment to human rights transcends geographical boundaries and cultural differences. The bedrock of our Human Rights Policy is the unwavering support for universal human rights principles, ensuring that every individual engaged in our operations, whether directly employed or within our supply chain, is treated with unwavering dignity and respect.

Non-Discrimination and Equality

At the core of our Human Rights Policy lies an unyielding commitment to non-discrimination and equality. We actively promote an inclusive environment that goes beyond mere compliance with legal requirements. This commitment fosters equal opportunities for all individuals, regardless of their background, characteristics, or affiliations.

Freedom of Association

Recognizing the importance of collective bargaining and the right to representation, our Human Rights Policy steadfastly upholds the freedom of association. This commitment ensures that every employee has the right to join associations, engage in collective bargaining, and express their views without fear of retaliation, fostering a workplace environment that values open dialogue and participatory decision-making.

Privacy and Data Protection

The protection of privacy and data is an integral aspect of our Human Rights Policy. We are resolutely committed to ensuring that personal information is handled with utmost confidentiality and in strict compliance with data protection laws. This commitment extends to safeguarding the privacy and rights of individuals within our organization, recognizing the importance of responsible data management in today's interconnected business environment.

Grievance Mechanisms

Facilitating an environment of openness and accountability, our Human Rights Policy incorporates robust grievance mechanisms. These mechanisms provide accessible and effective avenues for individuals to voice concerns, seek resolution for grievances, and contribute to continuous improvement in our commitment to human rights. By establishing clear channels for reporting and addressing grievances, we aim to uphold the principles of transparency and responsiveness in our operations.

This commitment is reinforced by adherence to national laws and practices, which include:

a) Singapore Employment Law 2021 - Employment of Children and Young Persons

Our Supplier Code of Conduct aligns with the Singapore Employment Law 2021, which permits the employment of children and young persons aged 13 to 16 years under specific conditions.

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Standards of Conduct in Business Transactions Policy

Ethical Business Practices

Our steadfast commitment to ethical business practices underscores every facet of our operations. We prioritize honesty and fair dealing as fundamental principles, ensuring that our business interactions are characterized by transparency, integrity, and equitable treatment. The cornerstone of our ethical framework lies in meticulous conflicts of interest

management, aimed at preemptively identifying and addressing potential conflicts to maintain the highest standards of impartiality and ethical conduct.

Compliance with Legal and Regulatory Requirements

Upholding legal and regulatory standards is an integral part of our corporate DNA. We go beyond mere compliance by meticulously adhering to the complexities of Singaporean laws and regulations. Our commitment extends globally, ensuring stringent compliance with international trade standards. To fortify our ethical foundation, we implement rigorous anti-money laundering measures, safeguarding against financial improprieties and ensuring the utmost transparency and legality in our financial practices.

Anti-Bribery and Anti-Corruption Measures

Our uncompromising stance against bribery and corruption is non-negotiable. We implement a robust set of measures to prohibit bribery and kickbacks, reflecting our commitment to maintaining the highest ethical standards. In business partnerships, due diligence is a pivotal component, serving as a proactive measure to identify and mitigate any potential risks related to bribery or corruption. Should any suspicions arise, our reporting mechanisms are transparent and comprehensive, fostering a culture of accountability and integrity across all levels of the organization.

Construction Business Standards Policy

Quality Assurance and Control

Our commitment to ensuring the highest standards of quality is exemplified through a meticulous approach to quality assurance and control. This includes the comprehensive implementation of ISO standards, which serve as a benchmark for excellence in our industry. Our adherence to ISO standards reflects our dedication to achieving and maintaining the highest levels of quality in our construction processes and deliverables.

Continuous Improvement Processes

At the core of our operational ethos lies a commitment to continuous improvement. We recognize that the pursuit of excellence is an ongoing journey. Therefore, our processes are designed to foster a culture of innovation and enhancement. Through regular assessments, feedback loops, and proactive identification of improvement opportunities, we ensure that our operations evolve in tandem with the dynamic demands of the industry.

Client Satisfaction Metrics

Our focus extends beyond meeting technical specifications to ensuring client satisfaction at every phase of a project. We employ robust metrics to gauge client satisfaction, seeking feedback and insights to refine our processes continually. This client-centric approach not only enhances our project delivery but also strengthens long-term partnerships built on trust and mutual success.

Safety Regulations Compliance

Ensuring the safety of our workforce and stakeholders is a paramount concern. We rigorously implement Occupational Safety and Health Administration (OSHA) standards, adhering to the highest safety protocols. Our commitment extends to the comprehensive implementation of Personal Protective Equipment (PPE) policies, ensuring that our workforce is equipped with the necessary gear to mitigate occupational risks.

Personal Protective Equipment (PPE) Policies

Our dedication to safety is reinforced through detailed Personal Protective Equipment (PPE) policies. These policies outline the mandatory use of appropriate protective gear in various work environments, emphasizing our commitment to creating a secure and hazard-free workplace for our employees.

Hazard Communication Protocols

To further fortify our safety measures, we implement hazard communication protocols. These protocols ensure that potential workplace hazards are effectively communicated to all stakeholders. Through clear signage, training programs, and accessible information, we strive to create an environment where every individual is well-informed and empowered to contribute to a safe working atmosphere.

Project Management and Timelines

Efficient project management is fundamental to our success. Project Planning and Scheduling form the initial steps, involving meticulous planning to ensure optimal resource allocation and timely completion. Resource Allocation and Management follow, ensuring that our teams are equipped with the necessary resources to execute projects seamlessly. Contingency Planning and Risk Mitigation strategies are integrated into our project

management framework, allowing us to proactively address challenges and maintain project timelines, even in the face of unforeseen circumstances.

Project Planning and Scheduling

Our approach to project management begins with meticulous planning and scheduling. This involves a comprehensive assessment of project requirements, setting realistic timelines, and developing a roadmap for successful project execution. Our commitment to effective planning is rooted in our desire to deliver projects with precision and efficiency.

Resource Allocation and Management

A crucial aspect of project management is the efficient allocation and management of resources. We prioritize the identification of resource needs, ensuring that our teams have access to the right skills, equipment, and support. This approach optimizes resource utilization, contributing to the overall success of our projects.

Contingency Planning and Risk Mitigation

Recognizing the dynamic nature of construction projects, we embed contingency planning and risk mitigation strategies into our project management framework. This proactive approach involves identifying potential risks, developing response plans, and implementing mitigation measures. By doing so, we enhance our resilience in the face of unforeseen challenges, ensuring project timelines are maintained with the utmost precision.

Accident and Injury Prevention Policy

Workplace Safety Protocols

Ensuring the well-being of our workforce is of paramount importance. Our commitment to workplace safety is reflected in the meticulous development and implementation of comprehensive safety protocols. These protocols encompass a holistic approach to identifying and mitigating potential hazards in the workplace, creating an environment where the health and safety of our employees are prioritized.

Safety Training Programs

Central to our accident and injury prevention strategy is the implementation of robust safety training programs. These programs are designed to equip our workforce with the

knowledge and skills necessary to navigate potential hazards safely. By fostering a culture of safety awareness through training initiatives, we empower our employees to make informed decisions that contribute to a secure working environment.

Emergency Evacuation Procedures

In the event of unforeseen emergencies, our emergency evacuation procedures are designed to provide clear and efficient guidance to all personnel. These procedures are regularly reviewed and practiced to ensure that every member of our workforce is well-prepared to respond promptly and effectively in critical situations, minimizing the risk of injuries and ensuring a swift and secure evacuation.

Safety Inspections and Audits

Our commitment to accident prevention is further reinforced through regular safety inspections and audits. These proactive measures involve a systematic review of our work environments to identify potential safety hazards. By conducting thorough inspections, we create a feedback loop that allows for continuous improvement in our safety protocols and the implementation of corrective actions where necessary.

Emergency Response Procedures

In the unfortunate event of emergencies, our emergency response procedures are designed to provide immediate and effective support. This includes the provision of first aid and medical assistance to those in need. Through well-established response protocols, we ensure that our teams are trained and equipped to respond swiftly and competently, minimizing the impact of accidents and injuries.

First Aid and Medical Assistance

Our commitment to the well-being of our workforce extends to the provision of first aid and medical assistance. We ensure that qualified personnel and well-equipped first aid stations are strategically placed across our work sites, facilitating prompt and efficient response to injuries or medical emergencies.

Incident Reporting and Investigation

To maintain a culture of transparency and accountability, we have established comprehensive incident reporting and investigation procedures. This ensures that any incidents, regardless of scale, are promptly reported, thoroughly investigated, and

corrective measures are implemented. This proactive approach allows us to learn from incidents, preventing their recurrence and continuously improving our safety measures.

Crisis Communication Protocols

Communication is critical during crisis situations. Our crisis communication protocols are designed to facilitate clear and timely communication during emergencies. This includes communication channels, designated spokespersons, and strategies for disseminating information to our workforce, stakeholders, and the public. By maintaining open lines of communication, we ensure that everyone is informed and can respond effectively in crisis scenarios.

Health and Safety Training Initiatives

Our commitment to accident and injury prevention extends to comprehensive health and safety training initiatives. We believe in empowering our employees with the knowledge and skills necessary to prioritize their well-being. These initiatives include ongoing employee training programs, safety awareness campaigns, and continuous efforts to enhance safety standards across our organization.

Employee Training Programs

Our employee training programs cover a wide array of topics related to health and safety. From specific job-related safety protocols to general safety awareness, these programs are designed to ensure that every employee is well-informed and capable of contributing to a safe working environment. Regular training sessions are conducted to refresh and reinforce safety knowledge.

Safety Awareness Campaigns

Creating a culture of safety awareness is a continuous effort. Our safety awareness campaigns are designed to keep safety at the forefront of our employees' minds. Through regular communication, posters, and engagement activities, we strive to instill a proactive mindset regarding safety, encouraging employees to be vigilant and take responsibility for their own safety and the safety of their colleagues.

Continuous Improvement in Safety Standards

Our commitment to accident and injury prevention involves a commitment to continuous improvement. We regularly review and enhance our safety standards based on industry

best practices, feedback from safety inspections, incident investigations, and advancements in safety technology. This iterative approach ensures that our safety measures evolve with the dynamic nature of the construction industry, providing a consistently safe working environment.

Environment & Sustainability Policy

Environmental Impact Assessment

Our unwavering commitment to environmental responsibility is reflected in our systematic approach to Environmental Impact Assessment (EIA). This critical process involves a thorough evaluation of potential environmental risks associated with our construction activities. Through a comprehensive analysis, we identify and assess the potential impacts, allowing us to make informed decisions aimed at minimizing our ecological footprint.

Evaluation of Environmental Risks

Central to our Environmental Impact Assessment is the in-depth evaluation of environmental risks. This entails a meticulous examination of factors that could pose harm to the environment. By identifying and understanding these risks, we can proactively implement measures to prevent or mitigate any adverse effects, ensuring that our construction projects align with the highest standards of environmental stewardship.

Mitigation Measures for Impact Reduction

In tandem with our evaluation of environmental risks, we are committed to the proactive implementation of mitigation measures. These measures are strategically designed to reduce or eliminate the potential impacts identified during the assessment phase. By addressing environmental challenges head-on, we demonstrate our dedication to responsible construction practices that prioritize the preservation of the natural environment.

Compliance with Environmental Regulations

Our commitment to environmental sustainability extends to strict compliance with all relevant environmental regulations. We operate within the framework of local and international laws, ensuring that our construction activities not only meet but exceed the established environmental standards. This commitment is a testament to our proactive role in fostering a sustainable and environmentally conscious construction industry.

Sustainable Practices in Construction

Embracing sustainable practices is integral to our construction philosophy. We actively seek ways to minimize our environmental footprint and contribute to a greener future. Our commitment to sustainable practices encompasses various dimensions, including the use of environmentally friendly building materials, initiatives to enhance energy efficiency, and comprehensive programs aimed at reducing waste and promoting recycling.

Use of Green Building Materials

As part of our sustainable construction practices, we prioritize the use of green building materials. These materials are carefully selected for their minimal environmental impact, contributing to the overall sustainability of our projects. By incorporating green building materials, we aim to create structures that not only meet high-quality standards but also align with our commitment to environmental responsibility.

Energy Efficiency Initiatives

Our dedication to sustainability extends to the promotion of energy efficiency in our construction projects. We actively seek innovative ways to reduce energy consumption, employing technologies and practices that prioritize efficient energy use. Through these initiatives, we not only contribute to environmental conservation but also position ourselves as leaders in responsible and energy-conscious construction.

Waste Reduction and Recycling Programs

Addressing the challenge of waste generation, we have implemented comprehensive waste reduction and recycling programs. These initiatives focus on minimizing the amount of waste produced during construction activities and maximizing the recycling of materials. By prioritizing waste reduction and recycling, we actively contribute to the circular economy and promote a more sustainable approach to construction.

Waste Management and Recycling Programs

Our commitment to responsible waste management is evident in our waste segregation and disposal policies. These policies are designed to ensure that waste generated during construction is segregated appropriately, facilitating efficient disposal processes. Additionally, we collaborate with recycling partners to maximize the recycling of materials, diverting waste from landfills and contributing to a more sustainable construction industry.

Waste Segregation and Disposal Policies

To streamline our waste management efforts, we have established rigorous waste segregation and disposal policies. These policies outline clear guidelines for the proper segregation of different types of waste, facilitating effective disposal and recycling processes. By adhering to these policies, we actively contribute to reducing the environmental impact of construction-related waste.

Collaboration with Recycling Partners

In our commitment to sustainability, we actively collaborate with recycling partners to enhance our waste management initiatives. These partnerships enable us to optimize the recycling of materials, diverting a significant portion of construction waste from landfills. Through collaborative efforts, we contribute to the development of a sustainable ecosystem within the construction industry.

Monitoring and Reporting on Sustainability Metrics

Transparency is fundamental to our commitment to sustainability. We actively monitor and report on sustainability metrics, providing stakeholders with a clear overview of our environmental performance. Through regular reporting, we demonstrate our dedication to accountability and continuous improvement, fostering a culture of sustainability within our organization and the broader industry.

Trade Secrets and Company Information Policy

Protection of Proprietary Information

Our commitment to safeguarding proprietary information is a cornerstone of our operational integrity. Within this framework, the identification and classification of trade secrets play a pivotal role. We employ meticulous processes to delineate and classify trade secrets, ensuring a clear understanding of the sensitive nature of these assets. Access to confidential information is strictly restricted, with designated personnel having the requisite authorization to prevent unauthorized disclosure.

Identification and Classification of Trade Secrets

Recognizing the intrinsic value of trade secrets, we institute robust processes for their identification and classification. This involves a comprehensive analysis to discern information that holds a competitive edge. Through this identification and classification, we

establish a foundation for protective measures tailored to the unique nature of each trade secret, fortifying our commitment to information security.

Restricted Access to Confidential Information

Maintaining a vigilant stance on information security, we strictly regulate access to confidential information. Access is granted only to individuals with a legitimate need, and stringent protocols are in place to verify and authorize such access. This controlled approach ensures that sensitive information remains within the purview of authorized personnel, minimizing the risk of inadvertent disclosure.

Non-Disclosure Agreements with Employees and Partners

Our commitment to information security is formalized through the execution of non-disclosure agreements (NDAs) with employees and external partners. These legally binding agreements serve as a contractual safeguard, clearly outlining the obligations and responsibilities pertaining to the protection of confidential information. This proactive measure establishes a legal framework for upholding the confidentiality of our trade secrets.

Handling and Storage of Confidential Information Secure Document Storage and Retrieval

To ensure the secure handling of confidential information, we implement stringent measures for document storage and retrieval. Physical documents are stored in secure facilities with restricted access, minimizing the risk of unauthorized handling. Additionally, advanced document retrieval systems are employed to facilitate efficient access for authorized personnel while maintaining a robust security posture.

Cybersecurity Measures for Digital Assets

In the digital landscape, cybersecurity assumes paramount importance. Our commitment to protecting confidential information extends to the implementation of advanced cybersecurity measures for digital assets. This includes robust encryption protocols, firewalls, and regular security audits to fortify our digital infrastructure against cyber threats, ensuring the integrity and confidentiality of our digital trade secrets.

Employee Guidelines on Confidential Information Handling

Guiding our workforce in the responsible handling of confidential information is essential. Employee guidelines are meticulously crafted to provide clear directives on the proper handling, dissemination, and storage of sensitive information. By instilling a culture of responsibility and awareness, we empower our employees to be proactive guardians of our trade secrets.

Public Affairs Policy

Corporate Social Responsibility Initiatives

Our commitment to corporate social responsibility is exemplified through a spectrum of initiatives aimed at contributing positively to society. Under this umbrella, community engagement programs take center stage. These programs are meticulously designed to foster meaningful interactions with local communities, promoting a two-way dialogue that enables us to understand their needs and concerns better.

Community Engagement Programs

In our pursuit of community engagement, we prioritize open communication with local communities. This involves regular and transparent dialogues, ensuring that community members are informed about our operations, while also providing us with valuable insights. Our commitment extends beyond communication to active participation in local development projects, contributing to the betterment of the communities where we operate.

Environmental Impact Mitigation Initiatives

Recognizing the environmental footprint of our operations, we proactively implement initiatives to mitigate our impact on the environment. These initiatives go beyond compliance with regulations, focusing on sustainable practices that reduce our ecological footprint. By embracing environmental impact mitigation initiatives, we demonstrate our commitment to responsible and sustainable business practices.

Social Welfare Contributions

Our dedication to corporate social responsibility extends to tangible contributions to social welfare. Through targeted initiatives, we actively contribute to social causes, addressing pressing issues and making a positive impact on the lives of individuals in need. These contributions are aligned with our values, reflecting our commitment to being a responsible corporate citizen.

Community Engagement Programs

Building meaningful relationships with local communities is integral to our ethos. Open communication forms the foundation of our community engagement programs, fostering transparency and trust. Additionally, we actively participate in local development projects, leveraging our resources to support initiatives that enhance the well-being of the communities we serve. Collaborations with local businesses and non-governmental organizations (NGOs) further amplify our positive impact, creating a network of shared values and mutual benefit.

Open Communication with Local Communities

Our approach to community engagement emphasizes open and transparent communication. We believe in keeping local communities informed about our activities, listening to their feedback, and addressing concerns in a timely and transparent manner. This two-way communication ensures that our operations align with the needs and expectations of the communities we are part of.

Participation in Local Development Projects

Actively participating in local development projects is a testament to our commitment to being a responsible corporate entity. By contributing resources, expertise, and support to initiatives that enhance the local infrastructure and quality of life, we aim to be a catalyst for positive change. This engagement is rooted in our belief that sustainable business practices are intrinsically linked to the well-being of the communities in which we operate.

Partnerships with Local Businesses and NGOs

Our commitment to community development extends to forging partnerships with local businesses and NGOs. These collaborations are designed to leverage collective strengths for the greater good. By working hand-in-hand with local entities, we contribute to economic development and social well-being, creating a positive ripple effect that goes beyond the confines of our immediate operations.

Public Communication and Representation Guidelines

In the realm of public communication, adherence to clear guidelines is paramount. Our corporate spokesperson protocols are established to ensure consistent and accurate representation. These protocols outline the responsibilities and expectations of corporate spokespersons, providing a framework for effective communication that aligns with our values and organizational objectives.

Corporate Spokesperson Protocols

Our corporate spokesperson protocols are designed to maintain a unified and consistent voice in public communication. These guidelines define the roles, responsibilities, and expectations of individuals designated as corporate spokespersons. By adhering to these protocols, we ensure that our public communications are coherent, accurate, and aligned with our organizational messaging.

Social Media Management Guidelines

In the digital age, social media plays a pivotal role in public communication. Our social media management guidelines provide a framework for responsible and effective use of social platforms. These guidelines cover aspects such as content creation, engagement strategies, and crisis management, ensuring that our online presence reflects our values and fosters positive interactions with stakeholders.

Crisis Communication Plans

In times of crisis, effective communication is crucial. Our crisis communication plans are comprehensive strategies designed to navigate challenging situations with transparency and agility. These plans outline protocols for swift and accurate communication, ensuring that stakeholders are informed, concerns are addressed, and our organizational reputation is safeguarded during challenging times.

Whistleblowing Policy

Whistleblower Protection Policies

Ensuring a culture of transparency and accountability, our whistleblower protection policies serve as a robust framework. The establishment of confidential reporting channels is a cornerstone, providing employees with secure avenues to report concerns without fear of reprisal. Complementing this, non-retaliation assurances underscore our commitment to safeguarding whistleblowers from adverse consequences. Whistleblower awareness programs further contribute to fostering a workplace environment that encourages reporting of misconduct.

Confidential Reporting Channels

Our commitment to whistleblower protection is evident in the establishment of confidential reporting channels. These channels provide employees with secure and discreet means to report concerns related to misconduct, unethical behavior, or any other violations. By ensuring confidentiality, we aim to empower whistleblowers to come forward with confidence, knowing that their reports will be handled with the utmost sensitivity.

Non-Retaliation Assurances

Central to our whistleblower protection policies are non-retaliation assurances. We unequivocally affirm that individuals who report concerns in good faith will not face any reprisals or retaliatory actions. This commitment extends to protecting whistleblowers from adverse employment consequences, ensuring a supportive environment that upholds the principles of fairness and justice.

Whistleblower Awareness Programs

To instil a culture of awareness and responsibility, we actively conduct whistleblower awareness programs. These programs educate employees on the importance of whistleblowing, the available reporting channels, and the protections in place. By enhancing awareness, we empower our workforce to actively participate in maintaining the integrity of our organization through ethical reporting.

Reporting Mechanisms and Confidentiality - Anonymous Reporting Options

Recognizing the sensitivity of certain situations, we provide anonymous reporting options. These mechanisms allow individuals to report concerns without disclosing their identity, fostering an environment where whistleblowers feel secure in coming forward. Anonymous reporting options are integral to our commitment to protecting whistleblowers and ensuring the confidentiality of their disclosures.

Independent Investigation Protocols

Upon receiving whistleblower reports, we follow independent investigation protocols. These protocols ensure impartial and thorough investigations conducted by qualified professionals. Independence in the investigative process is paramount to upholding the integrity of the process and addressing concerns in an unbiased manner.

Maintaining the Whistleblower's Identity Confidential

Our commitment to whistleblower protection extends to maintaining the confidentiality of the whistleblower's identity throughout the investigation process. Strict measures are in place to prevent any unauthorized disclosure of the whistleblower's identity, fostering trust and confidence in the reporting process.

Investigation and Resolution Procedures - Prompt and Impartial Investigations

Upon receipt of a whistleblower report, our commitment to prompt and impartial investigations is unwavering. We prioritize swift actions to investigate reported concerns thoroughly. The impartiality of the investigative process is maintained to ensure fairness and objectivity in addressing the issues raised.

Corrective Actions and Disciplinary Measures

In instances where investigations substantiate reported concerns, corrective actions and disciplinary measures are promptly implemented. Our commitment to accountability means that individuals found in violation of ethical standards or engaged in misconduct are subject to appropriate consequences. This approach reinforces our commitment to maintaining a workplace environment characterized by integrity and ethical conduct.

Continuous Improvement in Whistleblower Protection Policies

Reflecting our commitment to continuous improvement, we regularly evaluate and enhance our whistleblower protection policies. This proactive approach ensures that our policies remain aligned with evolving best practices and legal standards. By fostering a culture of continuous improvement, we strengthen our whistleblower protection framework, enhancing its effectiveness over time.

FORMS/ RECORDS

FONG LEONG ENGINEERING PTE LTD

ANTI-BRIBERY PROTOCOL FOR CONTRACTING

DOCUMENT NO:

FLE-OCP-03

REV.

01

Context A: Definition

Employer	- Fong Leong Group of Companies Direct Employment
Contractor	- Party who undertakes agreed scope of work from Fong Leong Group of Companies
Owner	- Client, Landlord, Owner of the project.
Official	- Personnel from Government, Political Party, Organization

1. "The Contractor, in performing its obligations under this Contract, shall establish and maintain the highest business and ethical standards, procedures, and controls, including those necessary to avoid any real or apparent impropriety or adverse impact on the interests of the Employer's Group and/or the Owner's Group.

The Employer shall have the right but not the obligation to periodically review, at a reasonable frequency during the performance of Works, such business standards and procedures, including, without limitation, those related to the activities of the Contractor's employees and agents in their relations with Employer's and Owner's employees, agents, and representatives, vendors, subcontractors, and other third parties, and those relating to the placement and administration of purchase orders and subcontracts.

Such review(s) shall not relieve the Contractor of its obligations under this Clause 24.

Participation by the Employer in any such review shall not constitute a waiver by the Employer of any rights under this Contract, and the Employer undertakes no obligations as a result of Employer's participation in such review.

Contractor shall ensure that all business operations under this Contract comply with the Prevention of Corruption Act (Chapter 241) and any other relevant anti-corruption laws of the Republic of Singapore. The Contractor shall not engage in any corrupt practices, including but not limited to bribery, extortion, or any form of unlawful or unethical conduct.

Contractor shall take all necessary measures to prevent and report any corrupt practices within its organization, and shall promptly inform the Employer of any such concerns.

2. For the purposes of this paragraph, 'Official' means and includes:

(a) Any officer or employee of any government or any department, agency, or instrumentality of the Republic of Singapore, or any person acting in an official capacity on behalf of any such government, department, agency, or instrumentality;

(b) Any political party or political office holder in the Republic of Singapore;

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(c) Any officer or employee of a Public International Organization (e.g., United Nations, IMF, World Bank) operating within the Republic of Singapore.

Contractor warrants and agrees that it has not offered, paid, promised to pay, authorized the payment of, or transferred, money or anything of value to any individual or entity, whether directly or indirectly through a third party, to secure any improper advantage or benefit in relation to the matters contemplated by this Contract under the Prevention of Corruption Act (Chapter 241) or any other relevant anti-corruption laws of the Republic of Singapore.

Without limiting the generality of Clause 27 (Compliance with Law), and in recognition of the principles of the Prevention of Corruption Act and other applicable anti-corruption laws of the Republic of Singapore, Contractor warrants and agrees that it will not, directly or indirectly, in connection with this Contract and the matters resulting therefrom, offer, pay, promise to pay, or authorize the giving of money or anything of value to any individual or entity, or to any other person while knowing or being aware of a high probability that all or a portion of such money or thing of value will be offered, given, or promised, directly or indirectly, to an individual or entity, for the purpose of influencing the act, decision, or omission of such individual or entity to obtain or retain business related to the Contract, to direct business related to this Contract to any person, or to obtain any improper advantage or benefit.

Contractor represents that no individual or entity, or their close relative, has any direct or indirect ownership or other legal or beneficial interest in it or any of its affiliates, or in the contractual relationship established by this Contract, and that no such individual or entity serves as an officer, director, employee, or agent of Contractor.

This representation shall be continuing throughout this Contract. Contractor agrees to notify the Employer promptly and in writing of any changes in its direct or indirect ownership in it or its affiliates that would make it or them subject to the anti-corruption laws of the Republic of Singapore.

Contractor covenants that should the Employer and/or Owner notify it of any concerns that there has been a breach of the provisions of this paragraph under the anti-corruption laws of the Republic of Singapore, it shall cooperate in good faith with the Employer in determining whether such a breach has occurred.

If Employer determines, in its sole discretion, that there has been such a breach or that Contractor has taken any action that would create a material risk of liability for the Employer and/or Owner under any applicable law, it shall be entitled to treat the breach as an event of default and to exercise any rights it may have under this Contract upon the occurrence of an event of default.

In addition, the Employer may terminate this Contract without cost if the Contractor is found to have violated the anti-corruption laws of the Republic of Singapore or if the Employer otherwise obtains substantial evidence that the Contractor has committed such an offense.

Contractor further agrees that, in connection with Work performed under this Contract and without limiting the requirements of Clause 4 with respect to subcontractors, it will require its

FONG LEONG ENGINEERING PTE LTD

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subcontractors to agree to and comply with contractual provisions substantially identical to those contained in this paragraph."

Context B: Additional Section: Anti-Corruption and Ethical Standards

Fong Leong Group of Companies is dedicated to maintaining the highest business and ethical standards in all of its operations, ensuring the prevention of corruption and the avoidance of any real or apparent impropriety. To uphold these principles, we incorporate the following standards and procedures:

1. Anti-Corruption and Ethics:

1.1. Corruption Prevention: Fong Leong Group of Companies strictly adheres to the Prevention of Corruption Act (Chapter 241) and other relevant anti-corruption laws, mirroring the obligations set forth in our contracts and agreements.

1.2. Business Conduct: All employees, officers, and stakeholders are prohibited from engaging in corrupt practices, including bribery, extortion, or any form of unlawful or unethical conduct.

1.3. Compliance Assurance: We will ensure that all business operations comply with anti-corruption laws, and take necessary measures to prevent and report any corrupt practices.

1.4. Review and Evaluation: Fong Leong Group of Companies reserves the right to periodically review, at a reasonable frequency, business standards and procedures related to our relationships with employees, agents, vendors, subcontractors, and third parties, as well as the placement and administration of purchase orders and subcontracts, in alignment with our contractual obligations.

2. Official Definitions:

For the purposes of this policy, the term 'Official' includes any officer or employee of any government, department, agency, or instrumentality of the Republic of Singapore, as well as any political party or political office holder in the Republic of Singapore, and officers or employees of Public International Organizations operating within the Republic of Singapore.

3. Ownership and Compliance:

3.1. Ownership and Affiliates: Fong Leong Group of Companies expects its employees, officers, and stakeholders to represent that no individual or entity, or their close relative, has any direct or indirect ownership or other legal or beneficial interest in the company or its affiliates that would make it or them subject to anti-corruption laws.

3.2. Notification of Changes: Fong Leong Group of Companies requires individuals to promptly notify the company of any changes in their direct or indirect ownership in the company or its affiliates that would affect compliance with anti-corruption laws.

3.3. Cooperation and Breach Reporting: Fong Leong Group of Companies expects individuals to cooperate in good faith with any investigations of potential breaches of anti-corruption laws.

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3.4. Termination and Legal Consequences: In the event of a breach of anti-corruption laws or actions that create a material risk of liability, Fong Leong Group of Companies may take appropriate actions, including potential termination or legal proceedings, in line with the terms of our contracts and agreements.

4. Subcontractor Compliance:

Fong Leong Group of Companies emphasizes the importance of requiring subcontractors to adhere to and comply with standards substantially identical to those outlined in this policy, as per the contractual provisions.

This section integrates the key anti-corruption and ethical standards outlined in context A into the framework of context B, aligning them with the broader Code of Business Conduct and Ethics in place at Fong Leong Group of Companies.