

VENDOR CODE OF CONDUCT

ST Engineering is committed to maintaining an ethical environment that encourages and promotes professional and ethical conduct of our management and fellow employees, our customers, business partners, and other stakeholders. This Vendor Code of Conduct (Vendor Code) defines the basic requirements of behaviour and practices we require from our Vendors concerning their responsibilities towards their stakeholders and the environment.

VENDORS ARE EXPECTED TO

- **Diversity, Non Discrimination and Anti-Harassment**
 - Respect people's rights and conduct their employment practices in full compliance with all applicable laws and regulations, and provide equal employment opportunity to employees and applicants for employment without discrimination.
 - Ensure that their employees are afforded an employment environment that is free from any threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse.
- **Product Quality and Safety**
 - Demonstrate a commitment to quality and apply appropriate safety practices in compliance with applicable laws, regulations, industry standards and good manufacturing practices that seek to reduce the risk of hazard to employees, the public, property and the environment.
 - Ensure their product and services meet or exceed our company's quality standards and contract requirements.
- **Workplace Safety & Health**
 - Provide a safe and healthy working environment for their employees and integrate sound Workplace Safety & Health management practices into its business.
 - Comply with all relevant health and safety laws and regulations, as well as the Workplace Safety & Health requirements set out in ST Engineering and its group of companies.
 - Not engage in violence or threatening behavior towards their employees and prohibit the use of illegal drugs.
- **Care for the Environment**
 - Care for the environment through a commitment to good environmental practices.
 - Operate in a manner that actively manages risk, conserves natural resources, and protects the environment.
 - Comply with all applicable environmental laws and regulations, as well as the Environmental requirements set out in ST Engineering and its group of companies.
- **Zero Tolerance for Corruption**
 - Not offer, give, accept or promise any sort of bribe, facilitation payments or kickback that may be viewed as, or has the effect of, improperly influencing business decisions.
 - Comply with all applicable anti-bribery and corruption laws and regulations of the countries in which they operate.
- **Gifts & Hospitality**
 - Compete on the merits of their products and services. The exchange of business hospitality and gifts may not be used as, an attempt to influence or be perceived by others to influence business decisions or official actions.
 - Ensure that the offering of any gift or hospitality is permitted by law and regulation, and that these exchanges do not violate the rules and standards of the recipient's organisation, and are consistent with reasonable marketplace customs and practices.
- **Conflicts of Interest**
 - Avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest.
 - Provide notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between the interests of ST Engineering and personal interests or those of close relatives, friends or associates.
- **Political Contributions and Donations**
 - Refrain from making any corporate contributions or donations to political candidates, or political officials or political parties, intended as, or that may be viewed as, attempts to influence business decision making.

- **Trade Embargoes, Sanctions and Export Controls**
 - Comply with national and International trade control laws and regulations when importing and exporting products, services, technology and information.
 - Have up to date knowledge about international restrictive measures, controls and sanctions (or embargoes) adopted against certain countries, governments, organizations, entities, companies, individuals or assets and shall not engage in business with them, where doing so is prohibited by applicable laws and regulations.
- **Competition, Antitrust and Fair Dealing**
 - Act in accordance with the competition, antitrust and similar laws in the countries where they operate or sell product or services.
 - Avoid unlawful agreements or understandings that improperly limit or control production or price fixing, bid rigging, market allocation, limit or control production in a way that improperly restricts competition.
- **Security over Information and Assets**
 - Safeguard ST Engineering assets from waste, loss, damage, theft, unauthorised disclosure, mis-use or infringement, through appropriate physical and electronic security procedures.
 - Follow the requirements set out in the ST Engineering and its group of companies' security policies and regulations when carrying out activities on our premises, or in our facilities.
- **Third Party Information**
 - Respect intellectual property rights and safeguard customer information. Information should not be used for any purpose (e.g. advertisement, publicity, and the like) other than the business purpose for which it was provided, unless there is prior authorisation from the owner of the information.
 - Comply with all the applicable laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks.
- **Personal Information**
 - Protect personal information confidentiality and comply with all applicable data privacy laws and regulations when personal information is collected, stored, processed, transmitted, and shared.
- **Official or Classified Information**
 - Not directly or indirectly disclose, copy extract or translate, publish or show Official or Classified information to any third party in any form whatsoever without the prior permission of ST Engineering.
- **Inside Information & Public Disclosure**
 - Not use any material or non-publicly disclosed information obtained in the course of their business relationship with ST Engineering Group of Companies as the basis for trading or for enabling others to trade in the stock or securities of any company.
- **Maintaining Accurate Records**
 - Create accurate records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All business transaction must fully and accurately represent the transaction or event being documented. Records should be retained based on the applicable retention requirements.
- **Engaging our Community**
 - Seek opportunities to help support, sponsor and contribute to the well-being and sustainability of their local communities through volunteerism, charitable giving and civic activities.
 - Listen carefully to requests or concerns from the community and address them appropriately.
- **Commitment and Communication**
 - Share the principles which are expressed in this Vendor Code while they are conducting business with and/or on behalf of ST Engineering for the benefit of its clients.
 - Communicate this Vendor Code to their employees and supply chain and self-monitor their compliance with this Vendor Code.
 - In the event that the expectations of this Code are not met, the business relationship may be reviewed and corrective action pursued subject to the terms of the related procurement contract(s.)