



## SOCIAL CODE OF CONDUCT

Venture Corporation Limited and its associated companies (“Venture” or the “Company”) believes that its growth and success must be anchored on a framework that is socially and ethically responsible.

The Social Code of Conduct (the “Code”) builds on Venture’s commitment to uphold good employment practices, workplace related human rights and desirable corporate governance.

It establishes a common approach for corporate wide development of policies and procedures whilst recognising that each Company has to observe the local labour law and practice within the political, economic and cultural environment.

Venture’s Code is modelled on and applies the language of the Responsible Business Alliance (RBA) Code of Conduct (formerly known as Electronic Industry Citizenship Coalition Code of Conduct). It is reviewed constantly for continual improvement and compliance.

### **Against Labour Exploitation**

Forced, bonded (including debt bondage) or indentured labour; involuntary prison labour; slavery or trafficking of persons shall not be tolerated. This includes transporting, harbouring, recruiting, transferring or receiving vulnerable persons by means of threats, force, coercion, abduction or fraud for the purpose of exploitation. All employees are free to leave upon giving reasonable notice. Workers must not be required to surrender any government-issued identification, passport or work permits as a condition of employment.

### **Elimination of Child Labour**

Venture is committed to the principles of protecting children from labour exploitation and hence, does not condone or employ child labour. A child is a person younger than 16 years of age.

### **Humane Treatment**

No employees within Venture shall ever be subject to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse nor is there to be a threat of any such treatment. In addition, the Company finds all aspects of harassment and bullying unacceptable and will not condone any such actions or attitudes in the workplace.

### **Non-Discrimination**

Venture is dedicated to providing equal employment opportunities to all employees and candidates. The Company shall state clearly the selection criteria in the job advertisements that shall principally be related to qualifications, skills, knowledge and experience. The Company will not engage in discrimination, direct or indirect, with regards to decisions on hiring, promotion, retirement or related corporate or employment initiatives on the grounds of employees’ or candidates’ race, colour, gender, sexual orientation, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership or marital or social status subject to the inherent requirements of the role to be performed.



### **Freedom of Association**

Venture respects both freedom of association and freedom of non-association. Employees are therefore free to join or not join recognised labour unions or other bona fide representatives within the framework of the Company procedures, applicable local laws and regulations and prevailing industrial relations and practices.

Employees can communicate openly and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment. Employees are free to engage in non-disruptive social interactions with each other at the workplace.

The Company will not interfere and will not finance (directly or through benefits in kind) any employee, organisation, or trade union to affect freedom of association.

### **Health and Safety**

Venture strives continuously to maximize the physical safety of its employees whenever they are employed. Whilst the Company endeavours to provide basic amenities for a safe and healthy work environment, employees are equally responsible for their overall safety.

### **Fair Business, Advertising and Competition**

Venture requires all employees to act with high standards of business integrity, to comply with all laws and regulations and to ensure that its business standards are never compromised for the sake of results. The Company shall not make false or misleading statements about our products and services in all our advertising campaigns. Employees shall not collude and/or take any other actions to fix prices or to impede competition.

Employees shall report any breaches or suspected/alleged violations of the Code, Company policies and applicable law and regulations to the management with the assurance that they are protected under an existing whistle blowing policy. There should be no unscrupulous dealing that involves accepting and/or offering bribery/favours to gain business advantage.

### **Information Integrity and Protection of Intellectual Property**

During the course of employment, employees may be given access to information that is confidential and/or proprietary to the Company. All employees are expected to treat such information with care and in accordance with the Non-Disclosure Agreement. They shall not disclose, share or communicate or permit any person(s) and/or company(ies) to use the information in any manner that may be commercially benefit themselves, any third party and/or result in any damage to Venture.



### **Protection of Identity**

Venture ensures that the confidentiality and protection of supplier and employee whistleblowers are maintained when they report on any suspected violations.

### **Privacy**

Venture is committed to protecting the reasonable privacy expectations of personal information of everyone we do business with, including suppliers, customers, consumers and employees. Venture shall comply with privacy and information security law and regulatory requirements when personal information is collected, stored or processed, transmitted and shared.

The collection, use and disclosure of personal data is outlined in Venture's Personal Data Protection Policy. The Policy can be viewed at the following web link

<http://www.venture.com.sg/about/PDPPolicy010714.pdf>

### **Non-Retaliation**

Employees are able to raise any concerns via our feedback channels without fear of retaliation.

Finally, Venture believes that corporate governance is more than simply a matter of compliance with the Code, policies and regulatory standards. It is embedding the right corporate mindset of its people. Essentially, Venture acknowledges that its employees are the key upholders of such standards and will continue to inspire every individual to support good corporate governance and facilitate continual improvements.

**VENTURE CORPORATION LIMITED**

A handwritten signature in black ink, appearing to read 'Sita'.

**Lim Sita**

**Chief Human Resource Officer**