



Code of Conduct

(Version 1.0, dated 01 September 2020)

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A. Words from Chairman and CEO

In line with Venture Group's relentless pursuit of excellence, it is with great pleasure that I share with you our updated Code of Conduct (Version 1.0, dated 01 September 2020).

The success of Venture Group is driven by the shared Mission and Five Core Values, which have shaped and guided every employee's thoughts, words and actions. These have served us well and withstood the test of time.

Our Code of Conduct is anchored on our Five Core Values, which articulate the principles and compliance expectations for all employees.

Our employees are the best ambassadors of our Five Core Values through their adherence to the Code of Conduct. As such, I encourage you to spend time reading and applying the Code of Conduct in your daily work.

Should you come across ambiguities or have questions regarding the Code of Conduct, please approach your Manager or Group HR leaders.

Venture Group has built and upheld a culture of excellence, total customer satisfaction, self-actualisation and personal integrity, teamwork and collaboration, creativity and innovation – for sustainable long-term performance and growth.

I look forward to every employee embracing the principles of the Code of Conduct as they progressively reach new heights of excellence along with the Venture Group.

Wong Ngit Liong

Chairman and CEO

Venture Corporation Limited



B. Lead by Example

Venture Group's success is underpinned by a strong and cohesive leadership team. Our leaders must embrace and practice the key attributes of effective leadership, which include our commitment to Honesty, Integrity, Accountability and Quality.

Through leading by example, effective leaders will be able to build cohesive and high-performing teams that embody principles of the Code of Conduct.

C. Seek Clarification When in Doubt

1. When in doubt, ask yourself the following questions: -
 - a) Is my action in line with Venture Core Values?
 - b) Is my action in compliance with Company Policies, local laws and regulations?
 - c) Will my action build trust with stakeholders?
 - d) Will the Company or I be portrayed positively if my action is publicly reported?
2. If your answers to any of the above questions is "No" or "Not Sure", then you should pause, reconsider your actions and consult your Manager or Group HR leaders.

D. Treat Employees with Respect and Dignity

1. Sound Employment Practices

- Venture Group's employment practices go beyond basic rights of workers, with zero-tolerance for any abuse. The Company observes freedom of employment, minimum age limit, reasonable work hours and benefits, fair wages and freedom of association in accordance with local legislation.



- The hiring and promotion of employees are based on merits and sustained good performance. There must be no discrimination based on race, religion, national origin, gender, marital status or on any other criteria.

2. Workplace Safety and Wellbeing

- The Company ensures our employees work in a healthy and safe environment, with emphasis on occupational safety, emergency preparedness, injury prevention, industrial hygiene, equipment safety, ergonomics and health/safety communication, in compliance with OHSAS 18000 standards where appropriate.
- In promoting a cohesive work environment; discrimination, harassment or bullying will not be tolerated.

3. Personal Data Privacy

- The personal data of employees shall be collected, used, disclosed, protected, transferred and disposed of in line with our Personal Data Protection Policy.

4. Conducive Work Environment

- While providing opportunities for employees to realise their full potential and contribute to a conducive work environment, the Company understands employees' right to freedom of association.

5. Safe Reporting Channels

- Employees are encouraged to report any suspected wrongdoings or share grievances with management without fear or favour, in accordance with the Whistle-Blowing Policy and Grievance Handling Policy.



E. Manage Business with Integrity and Responsibility

1. Confidential Information and Intellectual Property Rights

- Venture Group's trade secrets and intellectual property must be protected, and the intellectual property rights of others must be respected.
- Confidential information must be obtained through proper means and disclosed with due authorisation.
- Confidential information that our customers, suppliers and other business partners entrust to us must be protected.

2. Fair, Honest and Ethical Business Conduct

- The Company practices free and open competition based on the strength of our technological and solutions capabilities, and does not compete through unethical or illegal means.
- When dealing with our customers, suppliers and business partners, the principles of fairness and honesty are adhered to, based on mutual trust and respect.
- Unfair or anti-competitive behaviour is prohibited. The Company does not collaborate with competitors to practice bid rigging, price setting or dividing up markets or territories.

3. Sound Procurement Practices

- Suppliers are selected based on objective merits, and they are required to conduct business fairly, legally and ethically.
- Suppliers must ensure compliance with all applicable international trade regulations and export controls in accordance with our Export Control Compliance



Program, and source, use and handle conflict minerals in accordance with our Conflict Minerals Policy.

4. Financial Reporting and Record Keeping

- Complete and timely financial information are produced for informed business decisions. Our books and records are prepared in accordance with the provisions of the Singapore Companies Act, Singapore Financial Reporting Standards (International) as well as in compliance with applicable laws and regulations.

5. Company Processes and Records

- The Company maintains records of key policies, processes, documentation and templates to facilitate, inter alia, traceability, retention and safe keeping of important data, confidential documents, material contracts in accordance with local laws and regulations. Our document retention processes are for reference, archival purposes, internal learning by eligible employees and to ensure consistent practices across the Venture Group.
- Group Legal is the custodian of all material contracts entered into by a Venture Group entity and all original executed copies of such material contracts are retained and safe-kept by Group Legal at a central location at the headquarters.

6. Anti-Bribery and Anti-Corruption

- Employees must conduct themselves with the highest level of business integrity, accountability and transparency. The Company is against all forms of corruption in all jurisdictions where we operate.
- Under our Anti-Bribery and Anti-Corruption Policy, our employees shall not offer or attempt to offer any form of bribe, kickback or anything of value to any person or organisation for the purpose of securing or retaining any business or to gain an unfair advantage.



- Employees are reminded that the anti-bribery and anti-corruption laws have extra jurisdictional effect and any violation of these laws by a Venture Group employee at any of the Group entities may have legal consequences in other jurisdictions in which we operate.

7. Gifts and Business Entertainment

- The Company does not condone acceptance or giving of gifts or business entertainment or anything of value to any party if the intent is to improperly influence a business decision or secure a favour or a benefit in exchange.
- Anything beyond modest gifts or business entertainment from existing or potential customers, suppliers or other business partners must not be accepted.
- Any acceptance or giving of any gifts or business entertainment must comply with our Gifts and Business Entertainment Policy.

8. Conflicts of Interest

- Employees must refrain from any practice or involvement that could lead to, or even be perceived as a conflict of interest under the terms of our Conflict of Interest Declaration Programme.
- If employees find themselves in such situations, they must immediately disclose their other interest through a “Conflict of Interest Disclosure Form” available in HR Department.

9. Trading of Company Shares

- Restrictions in the trading of our Company’s shares in accordance with our Insider Trading Policy must be adhered to. We must not trade in the Company’s shares when we have knowledge of or are in possession of any price-sensitive information



that is not available to the public. Such price-sensitive information must not be disclosed to any other person.

10. Company Assets

- Employees are custodians and/or stewards of the Company's assets and have a duty to exercise due care to avoid loss, damage, theft and misuse. Company assets include physical assets, electronic assets like software, Company intellectual property and information created, shared or downloaded in the Company systems.

11. Environment

- In accordance with our Sustainability Approach and Environment Policy, we adopt a preemptive approach to environmental management through initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally-friendly technologies.
- We work to comply with all local laws regarding environmental permits and reporting, pollution and noise reduction, hazardous and restricted substances controls, liquid and solid waste disposal, air emissions, storm water management, energy consumption and greenhouse gas emissions control. Maintaining the ISO 14001 certification is part of this commitment.

12. External Communications

- As a publicly listed company, the Company has an obligation to ensure fair communication to our shareholders and the general public. Any distribution or discussion of non-public information will not be condoned.
- Timely and effective communications with our shareholders and the general public is maintained through the Company's corporate website and designated spokespersons.



- Employees must abide by social media and online communications etiquette for both business and personal use, bearing in mind that any comments shared in a personal capacity may have repercussions to the individual and the Company.

F. Report Concerns or Potential Misconduct

- Employees may report any concerns or violations of this Code of Conduct by bringing the matter to the attention of the Whistle-Blowing Review Committee in accordance with our Whistle-Blowing Policy through any of the following channels:
 - **By Telephone:** to the **Head of Internal Audit** (+65-64848036) during Singapore office hours, 8.00 am to 5.30 pm from Monday to Friday. Outside office hours, we advise callers to report via email or by post, details given below.
 - **By Email:** whistleblow@venture.com.sg.
 - **By Post:** **Head of Internal Audit**, Venture Corporation Limited, 5006, Ang Mo Kio Avenue 5, #05-01/12 TECHplace II, Singapore 569873.
- All employees must fully cooperate with any investigation conducted pursuant to the Whistle-Blowing Policy.