



## VENTURE CORPORATION LIMITED

Incorporated in Singapore  
Co. Reg. No: 198402886H  
(the “Company”)

### VENTURE GROUP ETHICS POLICY

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#### 1. Introduction

The Company and its subsidiaries (together, the “**Venture Group**”) are committed to upholding the highest standards of responsible business conduct and in compliance with all applicable laws, rules, and regulations.

This Ethics Policy (this “**Policy**”) articulates the Venture Group’s commitment to integrity, transparency, and accountability throughout our business operations.

#### Scope of Application

This Policy applies to all Directors, officers and employees of the Venture Group, whether contracted on a full-time or a part-time basis.

In addition, this Policy is communicated to all customers, suppliers and other business partners such as contractors, consultants, freight forwarders, distributors, sales representatives or any persons doing business with the Venture Group or on its behalf, as a condition of doing business with the Venture Group. The Venture Group seeks the strong support of its business partners in its commitment to ethical business conduct.

The Policy is to be read in conjunction with other related policies including:

- **Code of Conduct**, which outlines the key principles, ethics and best practices in the conduct of the Venture Group’s business.
- **Employee Handbook**, which provides guidance to employees on applicable policies and procedures as appropriate.
- **Anti Bribery and Corruption Policy**, which states our zero-tolerance approach to inducement, bribery and corruption, and our commitment to conducting business in full compliance with applicable anti-bribery or anti-corruption laws.
- **Gifts and Business Entertainment Policy**, which regulates the receipt and provision of corporate gifts and business entertainment to external persons.
- **Conflict of Interest Declaration**, which provides a framework to guide Venture Group employees in instances of actual or potential conflicts of interest.

- **Personal Data Protection Policy**, which sets out policies and procedures with respect to personal data that is collected, used, disclosed or otherwise processed by the Venture Group.
- **IT Incident Management Procedure**, which provides a framework for proactive management of our information systems and processing facilities.
- **Acceptable IT Use Policy**, which outlines the rules applicable to all personnel accessing or using information assets associated with the Venture Group.
- **IT Password Policy**, which establishes the standard for password creation, protection and maintenance for secure access to the Venture Group's computer and communication systems.
- **Sustainable Procurement Policy**, which outlines our commitment to ethical and sustainable procurement.
- **Quality Policy**, which outlines the group's belief in providing best-in-class goods and services to customers.
- **Whistle-Blowing Policy**, which provides a channel for employees and third parties to raise and report any concerns about possible improprieties in matters of financial reporting or other wrongdoings relating to the Venture Group and its employees.
- **Grievance Policy and Procedure**, which provides a framework for resolution of difficulties that may arise in the workplace as appropriate.

If there are any discrepancies between the Venture Group's policies, the stricter standard shall apply. This Policy does not purport to be exhaustive and is not intended to be used as a substitute for obtaining specific professional advice as may be required. It does not purport to exhaustively address the legal or regulatory requirements of any country or jurisdiction.

## 2. Our commitment

The key policy principles are set out below.

### ***Standards of business conduct***

Venture is committed to maintaining the highest standards of compliance and integrity. This is reflected in our Code of Conduct, which forms the foundation of the Company's policies and procedures on key topics such as sound employment practices, personal data privacy, ethical business conduct and whistleblowing.

These policies are regularly communicated to the Board of Directors, employees, and business partners to ensure a shared understanding of their role in preventing unethical or illegal behaviour.

Mandatory training sessions on the Code of Conduct were conducted in 2024 for employees. These training sessions covered key principles of ethical conduct, detailed scenarios to illustrate appropriate behaviour and practical guidance on addressing workplace challenges.

### ***Anti-bribery and corruption***

The Venture Group forbids any any form of inducement, bribery or corruption and is committed to conducting our business in full compliance with applicable laws.

As stated in our Anti Bribery and Corruption Policy:

- The Venture Group adopts a zero-tolerance approach to inducement, bribery and corruption.
- Directors, officers and employees are prohibited from making any unauthorised political donations on behalf of the Venture Group.
- Gifts to public officials are strictly prohibited, and entertainment for public officials should be modest and reasonable.
- Due diligence should be conducted on prospective and existing business partners and other third parties to establish their anti-bribery credentials, where warranted by the assessed level of risk.

This is supplemented by our Gifts and Business Entertainment Policy which regulates the receipt and provision of corporate gifts and business entertainment to external persons, and our Supplier Code of Conduct which prohibits our suppliers and their supply chain from engaging in any form of bribery or corruption.

All reports or complaints of violations of the Anti Bribery and Corruption Policy are investigated in accordance with the process set out in the Whistle-Blowing Policy. Any violation will lead to disciplinary action and/or sanctions for the individuals involved, and reporting to the police or relevant regulatory agency.

There were no reported instances of corruption or bribery, and no public legal cases regarding corruption or bribery were raised against the Venture Group in 2024. No contractual relationships with business partners or suppliers were severed due to corruption or bribery breaches.

### ***Conflicts of interest***

Venture's Code of Conduct requires all employees to refrain from any activities or relationships that could lead to, or be perceived as, a conflict of interest under our Conflict of Interest Declaration Programme. Any such situations must be promptly disclosed using the "Conflict of Interest Disclosure Form," which is readily accessible through the Human Resources department. To reinforce accountability, employees who are executives and above are required to complete an annual Self-Declaration on Conflicts of Interest.

Similarly, our suppliers are expected to avoid both actual and perceived conflicts of interest in their dealings with the Venture Group. Any such circumstances must be reported to the Company at the earliest opportunity.

### ***Anti-money laundering and anti-fraud***

The Venture Group forbids any form of illegal or unethical conduct and is committed to anti-money laundering and anti-fraud in full compliance with applicable laws.

Our Code of Conduct articulates our commitment to fair, honest and ethical business conduct. All reports or complaints of violations are investigated in accordance with the process set out in the Whistle-Blowing Policy. Any violation will lead to disciplinary action and/or sanctions for the individuals involved, and reporting to the police or relevant regulatory agency.

### ***Information Security***

The Venture Group places strong emphasis on cybersecurity through a comprehensive cybersecurity framework aligned to the National Institute of Standards and Technology ("**NIST**") Cybersecurity Framework. Guided by the NIST framework, we identify and protect information assets, detect anomalies through continuous monitoring, respond swiftly to incidents, and ensure a rapid recovery process.

Our cybersecurity practices go through a rigorous ISO 27001 certification, the global standard for Information Security Management Systems ("**ISMS**"). We conduct comprehensive risk assessments, implement effective risk treatment plans, and develop policies consistent with ISO guidelines.

Continuous improvement is embedded in our approach, with regular audits to enhance cybersecurity controls. We also conduct a Group-wide Vulnerability Assessment and Penetration Testing ("**VAPT**") annually to stress-test our systems.

We have in place a Privileged Access Management ("**PAM**") system to mitigate risks associated with data breaches and ransomware, a 24x7 Managed Detection & Response ("**MDR**") service with a leading security services provider, and a Security Incident & Events Management ("**SIEM**") initiative to consolidate data, offer real-time threat detection, and improve incident response Group-wide.

We strive to create a vigilant and informed workforce capable of effectively safeguarding sensitive information and proactively mitigating cyber risks. Phishing simulation exercises and cybersecurity-related training are conducted for employees throughout the year to improve cybersecurity awareness and knowledge.

### ***Training***

Employees are provided training on ethics and compliance matters through our online Learning Management System ("**LMS**"). Business conduct, anti-bribery and anti-corruption, and other compliance topics are key components of our employee training programme.

## ***Legal and regulatory compliance***

The Venture Group is committed to complying with all laws, rules, and regulations applicable to our operations. There were no incidents of significant fines or non-monetary sanctions related to and breach of rules and regulations in 2024.

### **3. Our targets**

As part of our commitment to upholding the highest standards of ethics we have implemented the following relevant group-level targets.

| <b>Category</b>                            | <b>Annual target(s)</b>   |
|--|---|
| Responsible business conduct               | Maintain frequency of Code of Conduct modules and refresher training  |
|  | Zero cases of corruption in each calendar year  |
| Protection of confidential information     | Zero breaches of data privacy in each calendar year   |
|  | Enhance existing processes to safeguard confidential information  |
|  | Obtain ISO 27001 ISMS certification for all key global sites  |
| Compliance with other laws and regulations | Zero cases of non-compliance with all relevant laws and regulations in each calendar year                                     |
|  | Zero cases of significant fines or non-monetary sanctions related to environmental laws and regulations in each calendar year |

### **4. Governance**

The Company's Board of Directors has overall responsibility for ESG matters. At the management level, the Sustainability Steering Committee, comprising the Executive Chairman, the Group CEO and the CFO, drives and executes the Company's strategy. The Sustainability Department plans, manages and oversees sustainability matters at Group level and is responsible for implementing this Policy.

### **5. Communications**

This Policy is available to all employees on the Company's intranet and also publicly available on the Company's website at <https://www.venture.com.sg/social-and-governance/>, ensuring that all Directors, officers and employees of the Venture Group have access to current guidelines.

## **6. Non-compliance**

In case of non-compliance with this Policy, the Venture Group has a Whistle-Blowing Policy to provide a channel for employees and third parties to raise and report, in good faith and in confidence, any concerns about possible improprieties.

The Venture Group does not condone or tolerate any form of reprisals, unfair or detrimental treatment, such as harassment, retaliation or victimisation, against a whistle-blower who files a whistle-blowing report in good faith. We are committed to protecting whistle-blowers against reprisals, unfair and detrimental treatment arising out of or related to reporting a genuine concern, even if such a concern turns out to be unfounded subsequently.

The Audit & Risk Committee is responsible for the oversight and monitoring of the Whistle-Blowing Policy and any whistle-blowing reports. There is a confidential line of communication to make whistle-blowing reports by post to the Company's registered address, marked to the attention of the Audit & Risk Committee Chairperson. Reports can also be lodged by calling the hotline at +65 6484 8096 or via email at [whistleblow@venture.com.sg](mailto:whistleblow@venture.com.sg).

The Whistle-Blowing Policy is supplemented by a Grievance Policy and Procedure which provides a framework for resolution of difficulties that may arise in the work place, through open communication and discussion between colleagues.

Both the Whistle-Blowing Policy and Grievance Policy and Procedure are clearly communicated to all employees and are available on the Company's intranet.

## **7. Review**

This Policy shall be reviewed at least annually, or as and when necessary, to maintain its relevance and effectiveness in achieving the Venture Group's ethics and compliance objectives.



**Wong Chee Kheong**  
Group CEO

Date: 1 August 2025