



VENTURE CORPORATION LIMITED

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

VENTURE GROUP SUSTAINABLE PROCUREMENT POLICY

1. Introduction

The Company and its subsidiaries (together, the “**Venture Group**”) support global efforts to ensure responsible manufacturing processes with transparent sourcing and sustainable supply chain practices. Beyond the Venture Group’s own operations, we actively encourage and support our suppliers in adopting responsible business practices. This Sustainable Procurement Policy (this “**Policy**”) articulates the Venture Group’s commitment to ethical and sustainable procurement.

2. Scope of application

This Policy applies to all Directors, officers and employees of the Venture Group who are directly or indirectly involved in procurement activities, 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 Venture. The Venture Group seeks the strong support of its business partners in its commitment to ethical and sustainable procurement.

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

- **Environment Policy**, which outlines our commitment to minimising our environmental footprint through driving reductions in greenhouse gas emissions, energy use, water use and waste generation.
- **Supplier Code of Conduct**, which sets clear expectations for all suppliers in labour practices, health and safety, environmental stewardship, and ethical business conduct.
- **Quality Policy**, which states our commitment to providing best in class solutions, services and safe products to all our customers. This is supported by the Quality Procedure, which states the procedures for supplier selection, as appropriate.
- **Export Control Compliance Policy**, which outlines our commitment to complying with global laws and regulations relating to export controls.
- **Responsible Minerals Policy**, which outlines our commitment to transparent and ethical sourcing, in accordance with the Dodd-Frank Wall Street Reform and

Consumer Protection Act (“**Dodd-Frank Act**”) and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (“**OECD DDG**”).

- **Labour and Human Rights Policy**, which outlines our commitment to respecting internationally recognised human rights throughout our operations, in alignment with local laws and the principles set out in the International Labour Organisation Declaration of Fundamental Principles and Rights at Work.
- **Ethics Policy**, which outlines our commitment to upholding the highest standards of responsible business conduct and in compliance with all applicable laws, rules, and regulations.
- **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.

3. Our commitment

With a global network of over 5,000 suppliers, integrating fair labour practices and environmental sustainability into our supply chain are essential to maintaining a responsible and resilient supply chain. While we take into careful consideration a wide range of factors such as quality and costs, it is our goal to achieve sustainability objectives through our procurement activities.

The key policy principles are set out below.

Supplier Code of Conduct

We strive to engage with our suppliers to take this journey together. Our Supplier Code of Conduct sets clear expectations for all suppliers in labour practices, health and safety, environmental stewardship, and ethical business conduct, aligning with the Code of Conduct of the Responsible Business Alliance (“**RBA**”). Our Supplier Code of Conduct applies to all Venture Group suppliers, including their subsidiaries, affiliates, subcontractors, and sub-tier suppliers.

By engaging with the Venture Group, suppliers agree to comply with our Supplier Code of Conduct in both letter and spirit. From time to time, we may request suppliers to provide a written certification of compliance with the Supplier Code of Conduct. In

addition, the Venture Group may carry out audits to verify such compliance by its suppliers. Any non-compliance may jeopardise a supplier's business relationship with the Venture Group up to and including termination.

By embedding sustainability criteria into supplier selection, evaluation and engagement processes to the extent possible, we aim to reduce lifecycle emissions, minimise resource consumption, and promote the use of sustainable materials.

Annually, we survey our top suppliers by annual spend to assess their adherence to labour laws including risks of child or forced labour, environmental goal-setting, and accreditation received from standard-setting organisations such as RBA and ISO. In 2024, around 370 suppliers were surveyed with the results as follows:

- 100% of respondents acknowledged that they are able to conform to our Supplier Code of Conduct
- 100% of respondents acknowledged that they are able to conform to our Responsible Minerals Policy and Anti-Bribery and Anti-Corruption Policy

Environmental sustainability

In addition to adherence to all applicable laws, we seek the strong support of our suppliers to join our efforts to minimise negative environmental impact and contribute to environmental sustainability together.

We take the following environmental considerations in assessing our manufacturing partners:

- Commit to establishing and maintaining a system of identifying environmental impact of their activities and minimising adverse effects, and in particular obtaining ISO 14001 certification
- Responsible management of water resources
- Compliance with environmental permits, approvals and registrations
- Pollution prevention measures
- Reduction of energy consumption and greenhouse gas emissions

Social sustainability and governance

We uphold every employee's right to a safe and fair workplace while maintaining world-class standards of integrity across our global supply chain. We encourage our suppliers to align our visions together through considering the following aspects in their business operations:

- Industry-recognised standards with regards to occupational health and safety matters, or other social compliance standards such as RBA and Sedex
- Fair labour practices including fairness in working hours, wages and benefits
- Freedom of association
- Non-discrimination and non-harassment and humane treatment
- Prohibition of child labour and forced labour
- Data protection
- Business integrity and ethics including anti-bribery, anti-corruption and conflicts of interest

Conflict minerals

We support transparent and ethical sourcing, in accordance with the Dodd-Frank Act and the OECD DDG. We also support the actions of the RBA and Global e-Sustainability Initiative (“**GeSI**”), with our Responsible Minerals Policy modelled on RBA’s standards on responsible minerals.

We do not source specified metals from conflict regions controlled by non-government military groups or unlawful factions, nor from sites linked to concerns highlighted in Annex II of the OECD DDG, such as:

- Abuse of human rights
- Armed conflict and financing of armed groups
- Corruption, bribery, and money laundering
- Illegal control of mining sites by security forces

To ensure compliance with RBA standards on responsible minerals sourcing and OECD DDG Annex II requirements, all suppliers are required to:

- Adopt a policy ensuring that tantalum, tin, tungsten, and gold used in their products are conflict-free
- Establish due diligence frameworks to comply with responsible sourcing practices for minerals from Conflict-Affected and High-Risk Areas
- Cross-check smelters against the RBA’s Conflict-Free Smelter list, ensuring that only verified, ethical sources are used

Going beyond regulatory requirements, the Venture Group has expanded our mineral management scope to include cobalt, due to concerns over child labour and unsafe mining conditions. We continue to engage with suppliers to strengthen ethical sourcing capabilities and support alternative sourcing where necessary.

Please refer to our Responsible Minerals Policy for more details.

Legal and regulatory compliance

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

4. Our targets

As part of our commitment to upholding the highest standards of ethical and sustainable procurement, we have implemented the following Group-level targets.

Category	Annual Target(s)
Supplier Code of Conduct	30% of Venture Group top spend suppliers to confirm commitment to Supplier Code of Conduct by 2026

Responsible Minerals Sourcing	Zero incidents of non-compliance with the Responsible Minerals Policy in each calendar year
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
Training	Deliver sustainability training to 20% of the Venture Group Global Supply Base Management Department by 2026

5. 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.

6. 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.

7. 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.

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. In addition, the Whistle-Blowing Policy is publicly available on the Company's website at <https://www.venture.com.sg/social-and-governance/>.

8. 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 sustainable procurement goals.



Wong Chee Kheong
Group CEO

Date: 1 August 2025