



Policy - Process – Procedure

POLICY TITLE : CODE OF BUSINESS CONDUCT & ETHICS (GROUP)
POLICY NO. : CO 13.4
REVISION NO. : 11
ENTITY : CORPORATE / GROUP
DOCUMENT OWNER : CORPORATE HR

REV NO.	DESCRIPTION OF CHANGE	ORIGINATOR	RELEASE DATE
00	First release	Corporate HR	-
06	Added PDPA to the policy	Corporate HR	09 Oct 2020
07	Added 3 AML/CFT obligations to Clause 9	Corporate HR	10 May 2021
08	Added Trade Compliance Management	Corporate HR	05 Nov 2021
09	Added "Labour & Human Rights", "Freely Chosen Employment", "Avoidance of Child Labour", "Wages & Benefits", "Freedom of Association", "Free of Harsh & Inhumane Treatment" to Clause 7 Added 10 th Obligation "Data Breach Notification" to Data Protection Clause 15	Corporate HR	10 Nov 2021
10	Separated PDPA and Trade Compliance from the policy Updated the Approving Authority in Clause 6, 8, 10, 11, 13	Corporate HR	25 Oct 2022
11	Added Minimum Age of 16 in Avoidance of Child Labour Added Prohibition on Payment of Fees in Return for Employment Updated Confidential and Proprietary Information Added Non-Solicitation	Corporate HR	19 Oct 2023



Policy - Process – Procedure

Table of Contents

1.0	POLICY STATEMENT	4
2.0	PURPOSE	6
3.0	SCOPE	6
4.0	ABBREVIATIONS & DEFINITIONS.....	6
5.0	REFERENCES	6
6.0	RESPONSIBILITIES	6
7.0	PEOPLE & CONDUCIVE WORK ENVIRONMENT	7
7.1	INTERGRITY, MUTAL RESPECT AND FAIRNESS.....	7
7.2	LABOUR AND HUMAN RIGHTS.....	7
7.3	DIVERSITY.....	7
7.4	FAIR EMPLOYMENT OPPORTUNITY	7
7.5	FREELY CHOSEN EMPLOYMENT	8
7.6	AVOIDANCE OF CHILD LABOUR	8
7.7	WAGES AND BENEFITS	8
7.8	FREEDOM OF ASSOCIATION.....	8
7.9	FREE OF HARSH OR INHUMANE TREATMENT.....	9
7.10	PROHIBITION ON PAYMENT OF FEES IN RETURN FOR EMPLOYMENT .	9
8.0	BRIBERY AND ANTI-CORRUPTION	9
9.0	ANTI-MONEY LAUNDERING / COUNTER-FINANCING OF TERRORISM (AML / CFT).....	10
10	GIFTS AND HOSPITALITIES	10
11.0	CONFLICTS OF INTEREST	12
12.0	INFORMATION AND ASSETS	13
12.1	FINANCIAL INTEGRITY	13
12.2	CONFIDENTIAL AND PROPRIETARY INFORMATION	13



Policy - Process – Procedure

12.3	USE AND PROTECTION OF ASSETS.....	13
12.4	INTELLECTUAL PROPERTY.....	14
13	NON-SOLICITATION	14
14	DIRECTORSHIP	15
14	BUSINESS CONDUCT AND COMPLIANCE PROGRAMME.....	15
14.1	ADMINISTRATION AND ENFORCEMENT	15
14.2	CONDUCT INQUIRIES AND REPORTING	15
14.3	DISCIPLINARY ACTIONS	15
15	ANNEX – EMPLOYEE’S DECLARATION.....	17



Policy - Process – Procedure

1.0 POLICY STATEMENT

YCH Group Pte Ltd and its subsidiaries (“YCH”) are committed to ensuring that the company operates with high ethical standard. YCH believes that our continued success has to be built upon our core values of Reliability, Integrity, Sincerity, and Enterprise (“R.I.S.E”). These values dictate that every employee of YCH will act with the highest level of business ethics. We act openly and with honesty. We will comply with local rules and regulations. We value relationships and seek to build strong ties with our customers, suppliers, other stakeholders and among our colleagues.

OBJECTIVES

- To conduct business regionally/ globally with reliability, integrity, sincerity, and enterprise.
- To comply with codes of corporate governance in ensuring transparency and openness in the way YCH operates.
- To provide a conducive work environment.

RULES OF BUSINESS CONDUCT

Every YCH employees have the responsibility to adhere to the following rules:

- Comply with local and international laws, rules and government regulations that apply to our business.
- Refrain from providing or accepting any form of bribery, inducement or promise which run counter to our Core Values. This includes giving and receiving money and favors as well as illicit payments.
- Ensure that all gifts and hospitalities are for legitimate business purposes and are within limits set by the company.
- Ensure that the highest standards and strict quality controls are applied at each stage of the product or service lifecycle.
- Avoid taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other illegal trade practice.
- Avoid any unauthorized use of company’s funds and/or misuse of the funds for personal gain or personal benefit.
- Protect YCH’s assets, which are entrusted to the employees, from loss, theft, misuse, and waste, including communication services and equipment, third-party software and intellectual property.
- Safeguard confidential and/or proprietary information which employees may come across during their course of employment.
- Avoid any conflict of interest during the course of the employee’s employment in YCH.
- Practice integrity, mutual respect, and fairness in every aspect of dealing with other YCH employees, the public, the business community, customers, suppliers and government authorities.
- Ask the Human Resource Department in case of doubt and inform the Head of Human Resource about any behavior that does not comply with the Code of Business Conduct & Ethics Policy and Procedures.



Policy - Process – Procedure

Reviewed by:

Annie Lam
Head, Group Human Resources

Approved by:

Catherine Yap
Executive Director



Policy - Process – Procedure

2.0 PURPOSE

The Code of Business Conduct & Ethics Policy and Procedures provide YCH Group's minimum expectation about ethical business practices and regulatory compliance. The provisions of these policies and procedures are not intended to, and should not be interpreted to prohibit activities otherwise protected by law (including legal labour organizing activity).

3.0 SCOPE

This policy and procedures apply to YCH Group of companies, all subsidiaries or affiliates which YCH Group of companies directly or indirectly owns more than 50%, to all directors, officers, and employees except where superseded by specific terms of a valid contract or collective bargaining agreement.

If an actual or apparent, a conflict exists between these policies and procedures and the Employee Handbook or any contractual arrangement, please contact your immediate supervisor, HR Department, or Corporate Legal.

These policies and procedures do not create any contractual rights between YCH and its employees or create any express or implied promise for specific treatment in a particular situation. These policy and procedures are not intended to cover every issue or situation, nor does it replace other more detailed policies in place.

4.0 ABBREVIATIONS & DEFINITIONS

Bona fide	Undertaken in good faith
Facilitating payments	Small sums paid to facilitate or expedite routine or non-discretionary government actions, such as obtaining phone service or an ordinary license.
GM	General Manager
HR	Human Resources

5.0 REFERENCES

/1./	YCH Employee Handbook
/2./	Whistle Blowing Policy and Procedures

6.0 RESPONSIBILITIES

The Head, Group Human Resources is the process owner of this document and is responsible for maintaining this document. Any improvement or suggestion should be directed to the process owner. Revisions, amendments, and alterations to this policy and procedures can only be implemented via approval by the Executive Director. Changes will be notified to the employees when they occur. It is the responsibility of each employee to:



Policy - Process – Procedure

- Read, understand and comply with the Code of Business Conduct & Ethics Policy and Procedures and applicable laws, regulations, and YCH policies that are related to his/her job.
- Participate in training and educational programmes/ events required to his/her job.
- Obtain guidance for resolving a business practice or compliance concern if he/she is uncertain about how to proceed in a situation.
- Report possible violations of these policies and procedures, applicable laws, and regulatory requirements.
- Cooperate fully with any investigation.
- Commit to conduct YCH business with integrity and in compliance with applicable laws and regulatory requirements.

Countries may also adopt standards of professional conduct for their areas. It is the employees' responsibility to be fully aware of these standards and follow them.

7.0 PEOPLE & CONDUCIVE WORK ENVIRONMENT

7.1 INTERGRITY, MUTAL RESPECT AND FAIRNESS

YCH policy requires employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees must practice integrity, mutual respect and fairness in every aspect of dealing with other YCH employees, the public, the business community, customers, suppliers and government authorities.

7.2 LABOUR AND HUMAN RIGHTS

YCH upholds the human rights of all employees and treat them with dignity and respect as understood by the international community.

7.3 DIVERSITY

All employees are encouraged to understand and be tolerant of the different cultural beliefs and values within the Group.

7.4 FAIR EMPLOYMENT OPPORTUNITY

YCH policy prohibits all unlawful discrimination against any employee or applicant for employment. YCH is committed to providing equal opportunity to all qualified individual in its hiring and employment practices such as application for employment, promotions, rewards and access to training, job assignments, wages, benefits, discipline, and termination.

We are all expected to ensure we do not discriminate by:

- Gender
- Disability
- Family situation
- Sexual orientation
- Age



Policy - Process – Procedure

- Political and philosophical opinions
- Religious beliefs
- Union activity
- Racial, social, cultural or national origins

7.5 FREELY CHOSEN EMPLOYMENT

Forced, indentured labour, involuntary prison labour, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services. There shall be no unreasonable restrictions on employees' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities.

All work must be voluntary and employees shall be free to leave work or terminate their employment with notice mutually agreed as signed off in their employment contracts. Company and agents must not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law in the country which the company is operating from.

7.6 AVOIDANCE OF CHILD LABOUR

YCH strictly forbid the employment of any labour under the age of 16 or the minimum age set forth by the relevant country labour authorities, whichever is higher. The use of legitimate workplace apprenticeship/internship program, which comply with all laws and regulations, is however supported.

All employees are to produce document proof of their age before employment in the company. In the event where there are employees found to be under the minimum age, the relevant manager(s) shall stop the work of the child immediately and contact the guardian of the child to ensure the child returns safely to the guardian. Local HR is to investigate the non-compliance and follow up on the corrective and preventive actions. Strict disciplinary actions will apply for any intentional hiring or wilful negligence in the use of child labour.

7.7 WAGES AND BENEFITS

All compensation paid to employees shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Any disciplinary wage deductions are to conform to local laws. Company shall offer vacation time, leave periods, and holidays consistent with applicable laws and regulations. The basis on which employees are being paid is to be clearly conveyed to employees in a timely manner.

7.8 FREEDOM OF ASSOCIATION

In conformance with local law, Company shall respect the right of all employees to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of employees to refrain from such activities. Employees and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and



Policy - Process – Procedure

management practices without fear of discrimination, reprisal, intimidation or harassment.

7.9 FREE OF HARSH OR INHUMANE TREATMENT

YCH is committed to no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporate punishment, mental or physical coercion or verbal abuse of employees, nor there a threat of any such treatment.

YCH believes that all employees should be treated with dignity and respect. It is the policy of YCH to provide a work environment which is free from harassment. Harassment includes sexual, racial, ethnic, and other forms of harassment, including harassment based upon disability. Any employee who believes he/she is being harassed should consider telling the offending party that he/she objects to that conduct. However, if the comfortable confronting the offending party (or if the offending party's unwelcome conduct continues), the employee should advise his/her immediate supervisor of the offending conduct. If the employee is more comfortable discussing the issue with someone other than his/her immediate supervisor, or if the immediate supervisor has not taken what the employee regards as appropriate action to solve the problem, the employee should contact HR Department or Corporate Legal representative.

Some examples, depending on the facts and circumstances, include:

- **Verbal or written harassment** – unwelcome or derogatory comments regarding a person's race, color and sex, religion, ancestry, ethnic heritage, mental or physical disability, age or appearance; threats of physical harm; or distribution of material having such effects, including by electronic mail or display in any YCH work area.
- **Physical harassment** – hitting, pushing or other aggressive physical conduct.
- **Sexual harassment** – unwelcome sexual conduct, whether verbal or physical, including sexual advances, demands for sexual favors, or other verbal, physical conduct of sexual nature, whether or not it was designed or intended to promote an intimate relationship.

7.10 PROHIBITION ON PAYMENT OF FEES IN RETURN FOR EMPLOYMENT

YCH is committed to protect workers from unethical recruitment practices. YCH policy prohibits payment of fees in return for employment, prohibits withholding of workers' original identification documents, and ensures workers are free to quit without penalty by providing reasonable notice that complies with their employment contract, Collective Agreement, or applicable law.

8.0 BRIBERY AND ANTI-CORRUPTION

Any form of bribery, inducement or promise, which counters to anti-bribery acts, is strictly prohibited. This includes giving and receiving money and favor, as well as illicit payments. All employees, consultants, representatives, agents and joint venture partners acting on behalf of YCH must be made aware that they must fully comply with the provisions of the relevant laws regarding foreign corrupt practices,



Policy - Process – Procedure

bribery and all other applicable anti-bribery laws and regulations. YCH does not tolerate violations.

In some countries, government employees commonly accept “facilitating payment” for performing certain required duties. Facilitating payments are not permitted except under the following, strictly limited circumstances:

- To avoid an immediate threat to the health, safety, liberty, or welfare of any person; or
- To avoid damage to company facilities or hazards to the local environment.

However, all such payments must be first reviewed by Corporate Legal and approved by the respective Country GM for Countries or Executive Director for Corporate Functions.

9.0 ANTI-MONEY LAUNDERING / COUNTER-FINANCING OF TERRORISM (AML / CFT)

Obligations of all employees, trustees, volunteers, consultants, seconded and interns:

- Not to assist in the money laundering process through acquiring, concealing, disguising, retaining or using the proceeds of crime.
- Not to prejudice an investigation.
- Not to contact any person who has been suspected of, and reported for, possible money laundering in such a way as to make them aware of the suspicion or report (“tipping off”).

It is important to note that the law requires all cases of suspicion to be reported, regardless of size.

10 GIFTS AND HOSPITALITIES

All gifts or hospitalities, regardless of amount, must have legitimate business purposes. No YCH employee or representative may provide any gift or hospitality to the current or potential clients during a tender or competitive bidding process. At all times, small gifts for promotional and demonstration purposes are generally permissible as promotional expenses.

Gifts should not exceed the lesser of SGD 50 or the amount associated with local customs or laws. If an employee would like to provide a gift more than amount, then the employee needs to obtain approval in advance according to approving authority summarised in the table below:

Amount (in SGD or amount equivalent to SGD)	Approving Authority
x<50	No approval required
50<x≤500	Country GM for Countries;



Policy - Process – Procedure

	Executive Director for Corporate Functions
x>500	Regional Head for Countries; Executive Director for Corporate Functions

As for receiving gifts, no employees are allowed to receive cash and vouchers. All gifts received must be declared to Country HR and for gifts over SGD 50 must be reported to Corporate HR.

For business entertainment or any social activity that is occasional in occurrence (such as dining, attending a theatrical or sporting event, or participating in a recreational activity) valued at less than SGD 50, per person, per occurrence is also acceptable. For value more than SGD50, per person, per occurrence, the employee has to obtain approval in advance according to approving authority summarised in the table below:

Amount (in SGD or amount equivalent to SGD), per person, per occurrence	Approving Authority
x<50	No approval required
50<x≤100	Country GM for Countries; Executive Director for Corporate Functions
100<x≤200	Regional Head for Countries; Executive Director for Corporate Functions
x>200	Executive Director

Subsequently, the employee has to indicate all expense details including purpose and personnel involved, etc. on the claims form.

Any gift and hospitality, whether given or received by a YCH employee should have all of the following characteristics:

- Not motivated by any expectation or reciprocity (business deal in exchange for a gift, meal or entertainment);
- Given in a direct, transparent, and bona fide manner, with a bona fide and legitimate business purpose related to the promotion, demonstration, or explanation of products or services or performance of a contract;
- Consistent with generally accepted standards of professional courtesy (local customs);
- Comply with local laws and regulations;
- Comply with the recipient's organization rules;
- Properly recorded and documented in financial books and records (by Company's audit standards reflecting the true nature of the expense);
- Given in connection with a recognized gift-giving event, if applicable (such as a local holiday);
- Not in cash or cash equivalent (including loans, stocks, money orders, etc.);
- No pattern of regularly giving nominal gifts to the same individual;



Policy - Process – Procedure

- Reasonable and customary under the circumstances, with clear and justifiable business reason for each expense, avoiding any appearance of impropriety;
- The amount of the expenses are reasonable and in line with industry norms;
- No travel expenses for accompanying family members are paid or reimbursed;
- No side trips or holiday are reimbursed; and
- Payments are made directly to service providers rather than individuals receiving the gift or hospitality.

The above rules are not necessarily applicable to YCH-sponsored events, which may be subject to other guidelines.

11.0 CONFLICTS OF INTEREST

YCH understands that conflicts of interest may arise in a variety of situations and employees may get involved in conflict situations during the course of business activities. YCH policy prohibits any conflict between the interest of its employees and YCH. It may be appropriate for the employee concerned to maintain their current position but not participate in decision making on the affected matters.

The following situations are considered a prohibited conflict of interest when an employee or any person having a close personal relationship with the employee (including employee's relative, a close friend, any person living in the same house with the employee or business associate):

- Obtain a financial or other beneficial interest in one of YCH's suppliers, customers or competitors without first notifying YCH and obtaining written approval from the Executive Director or his/her designee;
- Engages in personal business transactions involving YCH for profit or gain, unless such transaction has first been approved in writing by the Executive Director or his/her designee;
- Accepts money, gifts of other than nominal value, excessive hospitality, loans or other special treatment from any supplier, customer or competitor of YCH (loans from lending institutions at prevailing interest rates are excluded);
- Participates in any sale, loan or gift of YCH property without obtaining written approval from the Executive Director or his/her designee; or
- Learns of a business opportunity through association with YCH and discloses it to a third party or invests in the opportunity without first offering it to YCH. This includes directly or indirectly buying, leasing or otherwise acquiring rights to any property or material if YCH might also be interested in pursuing the opportunity.
- Personal use of YCH property or obtaining YCH services for personal benefit without obtaining written approval from the Executive Director or his/her designee.

Disclosure of a particular situation that may be a conflict of interest does not mean that YCH will consider it to be substantial enough to be prohibited. Each situation will be considered on an individual basis.



Policy - Process – Procedure

12.0 INFORMATION AND ASSETS

12.1 FINANCIAL INTEGRITY

All employees are strictly prohibited from any unauthorized use of company's funds and/or misuse of the funds for personal gain or benefit. Financial records and accounting controls have to comply with applicable laws, which employees can refer to the Finance standards for guidance.

12.2 CONFIDENTIAL AND PROPRIETARY INFORMATION

YCH employees may be in possession or may have access to any of the confidential and/or Intellectual Property Rights and any of the physical or digital stamp or brand image belongs to the YCH and/or its Affiliates ("Company's Property") and /or the YCH and the YCH's customers ("Customer's Property") during the course their employment.

Confidential or proprietary information includes all information that is not generally known to the public and is helpful to the Company or would be helpful to the competitors. Proprietary information should be marked accordingly, kept secure and access limited to those who need to know to do their jobs.

YCH policy prohibits employees from disclosing confidential and/ or proprietary information outside the Company, either during or after employment, without YCH authorization to do so. Such disclosure could be harmful to YCH or a customer or helpful to a competitor. Employees who will be providing a third party with confidential YCH information in the course of any business activity should consult Corporate Legal and their Function Head to determine if confidentiality agreement is or should be put in place with the third party.

YCH also works with proprietary data of customers, suppliers and joint venture partners. This is an important trust and must be discharged with the greatest care for YCH to merit their continued confidence. No employee shall disclose confidential and/or proprietary information to non-employees without YCH authorization, nor shall any employee disclose such information to other employees except on a need-to-know basis.

Employees shall use YCH's Property and Customer's Property solely in connection with any work, services or duties performed for YCH and not for any other purpose. Employees are fully responsible for their acts and omission and shall indemnify and hold harmless YCH, its' directors and officers against any and all loss, damages and other expenses (including but not limited to attorney's fees and disbursements) of any nature whatsoever paid or incurred by YCH, its directors and officers arising out of or in connection with the breach of this policy.

12.3 USE AND PROTECTION OF ASSETS

All employees have the responsibility to protect YCH's assets entrusted to us from loss, theft, misuse, and waste. YCH's assets and funds may be used only for



Policy - Process – Procedure

business purposes and may never be used for illegal purposes. Incidental personal use of telephones, fax machines, copy machines, personal computers, electronic email (“email”) and similar equipment is generally allowed if it is occasional, there is no significant added cost to YCH, it does not interfere with work responsibilities and is not related to an illegal activity or outside business.

If you become aware of theft, waste or misuse of our assets or funds or have any questions about proper use of them, you should speak immediately with your immediate supervisor, or you may submit your concern to Corporate HR.

12.4 INTELLECTUAL PROPERTY

All rights in YCH intellectual property, including any trademarks, copyrights, and patents, should be protected to the maximum extent permissible. Employees should strive to prevent unauthorized use of YCH intellectual property by third parties and report any potential violations to the Corporate Legal Department. If you believe any work product may be entitled to intellectual property protections, contact the Corporate Legal Department for assistance.

YCH policy also requires employees to respect the intellectual property rights of others. No employee shall misuse intellectual property and copyright belonging to another for any reason.

13 NON-SOLICITATION

During the term of employment and 6 months after resignation or termination with or without cause, employees who are leaving or have left YCH (the “ex-employee”) should not directly or indirectly:

- i. solicit, induce, entice or attempt to entice away from YCH or advise or recommend to any competitors that they employ or solicit for employment, either on his/her behalf or for or with any other person, any person:
 - who was an employee of the YCH on his/her last day of employment (the “Termination Date”); and
 - who had been an employee of the YCH at any time during the 12 months period prior to and including the Termination Date (the “Prohibition Period”) and with whom the ex-employee had worked closely with at any time during that period.
- ii. canvass, solicit, deal with, procure and/or otherwise accept, in competition with the YCH, the custom of any person who, during the Prohibition Period, was:
 - a customer or client of, or in the habit of dealing with; or
 - in negotiations with YCH with a view to dealing as a customer or client with,

any entity within YCH and in respect of whom the ex-employees had access to confidential information or with whose custom or business employees (or any of the



Policy - Process – Procedure

YCH's employees reporting directly to the ex-employee) were personally concerned with.

14 DIRECTORSHIP

YCH employees and managers/management generally should not hold directorships of non-affiliated and/or for-profit organization. However, there may be circumstances where Company's interest may be served, or an employee's personal situation may be reasonably accommodated. The following scenarios will be considered given proper approval process in place:

- An employee may accept directorships of businesses owned/controlled by their families after review and approval by Corporate HR and Executive Director.
- An employee may accept directorships in exceptional circumstances after review and approval by Corporate HR, Executive Director and by the Chairman of the Board.

14 BUSINESS CONDUCT AND COMPLIANCE PROGRAMME

14.1 ADMINISTRATION AND ENFORCEMENT

The HR Department is responsible for the overall administration of the Company's Code of Business Conduct and Ethics Policy and Procedures and for providing employees with resources and materials to assist them in conducting their business activities legally and ethically.

The Code of Business Conduct & Ethics Policy and Procedures are endorsed by and have the full support of the YCH's Board of Directors. The Board of Directors and management are responsible for overseeing compliance and enforcing the policy and procedures. The consequence for violation of YCH's Code of Business Conduct & Ethics Policy and Procedures may include disciplinary action up to and including termination of employment.

14.2 CONDUCT INQUIRIES AND REPORTING

If you need guidance regarding a business practice or compliance issue, or if you want to report a possible violation, talk to your immediate supervisor, manager, or another member of management or your HR manager.

Alternatively, if you have concern and wish to submit the concern confidentiality or anonymously, you may submit a report through the Whistle Blower channel, whistleblowing@ych.com.

14.3 DISCIPLINARY ACTIONS

The company has set forth guidance regarding disciplinary action for employees who have failed to comply with the Code of Business Conduct & Ethics Policy and Procedures. Managers will impose disciplinary action upon employees found to be in violation of the policy and procedures.



Policy - Process – Procedure

If an employee is found to be in violation, YCH must complete the following steps to prevent future instances of non-compliance:

- i. The manager of the supervisor will review the situation to determine the level of violation. The manager or supervisor will consult with the HR Department for guidance. Examples of violations include but not limited to the inappropriate use of YCH asset and property, participating in potential conflicts of interest, non-compliance with gifts receiving and giving policy, harassment, fraud, discuss or reveal confidential or proprietary information, etc.
- ii. An inquiry shall be conducted before deciding to take any form of disciplinary action against the employee. Examples of disciplinary action include counseling, verbal warning, written warning, suspension from work or dismissal from work.
- iii. YCH will follow the guidance by the Ministry of Manpower, where applicable when conducting an inquiry. The level of discipline assessed will be case specific.



Policy - Process – Procedure

Code of Business Conduct & Ethics
YCH Group Pte Ltd and Its group of Companies

15 ANNEX – EMPLOYEE’S DECLARATION

YCH expects the highest standards of integrity and conduct from all its employees. After reading this these Policy and Procedures, you should:

- Have a thorough knowledge of these policies and procedures
- Be able to recognize situations that present legal or ethical dilemmas
- Deal effectively with questionable situations in conformity with these policies and procedures

When you are faced with a situation and you not clear as to what action you should take, ask yourself the following questions:

- Is the action legal?
- Does the action comply with these policies and procedures?
- How will your decision affect others, including our customers and employees?
- How will your decision look to others? If your action is legal but can result in the appearance of wrongdoing, consider taking alternative steps.
- How would you feel if your decision was made public? Could the decision be honestly explained and defended?

By following the guidance provided in this publication, you acknowledge that you will manage our business activities with integrity.

If there are areas of ambiguity during your course of work, please clarify with your managers, HR, or Executive Director.

1. For employees with Singapore employment: Have you ever been convicted of any criminal offence?
 Yes
 No
2. For employees with Singapore employment: Are you an undischarged bankrupt?
 Yes
 No

By signing the below, you acknowledge that you have read and confirm your understanding of the Code of Business Conduct & Ethics Policy.

Name : _____

Department: : _____

Signature : _____

Date : _____