

SINGAPORE KITCHEN EQUIPMENT LIMITED

(Company Registration No. 201312671M)

(Incorporated in Singapore)

ANTI-BRIBERY POLICES

2 MAY 2018

Anti-Bribery

- 1.1 Singapore Kitchen Equipment Limited is fully committed to the principle of honesty, integrity and fair play in all its businesses and activities. All Management and staff should ensure that the businesses of the Company, such as procurement of materials, hiring of staff for providing contracting services, are dealt with in an open, fair and impartial manner. They should bear in mind that the Company is accountable to its customers, suppliers, contractors and sub-contractors, including the government and any private sectors, and all its members, in the conduct of its activities.
- 1.2 This Code of Conduct sets out the basic standard of conduct expected of all Management and staff and the Company's policy on such matters as acceptance of advantages and declaration of conflict of interest. This Code also applies to temporary or part-time staff employed by the Company.

Prevention of Bribery Ordinance

- 1.3 An employee who solicits or accepts an advantage in relation to his employer's business or affairs without the latter's permission may commit an offence. The term "advantage" is defined in the Ordinance and includes almost anything of value, except entertainment such as money, gift, commission, loan, fee, reward, office, employment, contract, service or favour (refer to 1.4 below).
- 1.4 "Advantage" means:
 - (a) any gift, loan, fee, reward or commission consisting of money or of any valuable security or of other property or interest in property of any description;
 - (b) any office, employment or contract;
 - (c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
 - (d) any other service, or favour (other than entertainment), including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not instituted;
 - (e) the exercise or forbearance from the exercise of any right or any power or duty;
 - (f) any offer undertaking or promise, whether conditional or unconditional, of any advantage within the meaning of any of the preceding paragraphs(a),(b),(c),(d) and (e),

Acceptance of Advantages

- 1.5 It is the policy of this Company to prohibit all staff from soliciting any advantage from any persons having business dealings with the Company (e.g. suppliers, contractors, subcontractors). Management and staff who wish to accept any advantage from such persons should seek special permission from the CEO prior to the acceptance.
- 1.6 Any gifts offered voluntarily to the management or staff in their official capacity is regarded

as gifts to the Company and they should not be accepted without permission. Management and staff should decline the offer if the acceptance could affect their objectivity in conducting the Company's business, or induce them to act against the interest of the Company, or lead to perception or complaints of bias or impropriety.

- 1.7 For gifts which are presented to management or staff in their official capacity and of nominal value (below SGD1,000.00), the refusal of which could be seen as unsociable or impolite (e.g. a plaque presented to management or a staff member during a seminar in which he is invited to be the guest speaker), the CEO has given a blanket permission for the management and staff to accept these gifts. In other circumstances, the Management and staff should apply in writing to the Board/Committee/CEO. Proper records of these applications should be kept showing the name of the applicant, the occasion of the offer, the nature and estimated value of the gift, and whether permission has been granted for the applicant to retain the gift or other directions have been given to dispose of the gift. Possible ways of disposal of such gifts are listed at 1.8 below.
- 1.8 Ways to dispose of gifts presented to a Management or a Staff Member in his official capacity:
- If the gift is of perishable nature (e.g. food or drink), it may be shared among the office or during an activity organized by the Company.
 - If the gift is of historical or other interest, it may be sent to a library or museum.
 - If the gift is suitable for display (e.g. a painting, vase, etc), it may be retained for display in the recipient's office or elsewhere noticeable in the Company's premises.
 - If the gift is of low value (below SGD1,000.00), it may be donated to the Company's social function as a lucky draw prize.
 - If the gift is a personal item of low value (below SGD1,000.00). It may be retained by the recipient after approval by the Company.
- 1.9 There is however no restriction on the acceptance of advantages, in the management's or staff's private capacity, from any person who does not have any official dealings with the Company. In case of doubt, the management and staff should refer the matter to the CEO for advice and instruction before accepting such offer of advantages.

Conflict of Interest

- 1.10 A conflict of interest situation arises when the "private interests" of the management and staff compete or conflict with the interests of the Company. "Private interests" means both the financial and personal interests of the management and staff or those of their connections including:
- family and other relations;
 - personal friends;
 - other companies or business interests which they hold or own (both in part or in whole);
 - other clubs and societies to which they belong; and
 - any person to whom they owe a favour or are obligated in any way.

1.11 Management and staff should avoid using their official position or any information made available to them in the course of their duties for the Company to benefit themselves, their relations or any other persons with whom they have personal or social ties, or business connections. They should avoid putting themselves in a position that may lead to an actual or perceived conflict of interest with the Company. Failure to avoid or declare any conflict of interest may give rise to criticism of favouritism, abuse of authority or even allegations of corruption, which are to the corporate disgrace of the Company. In particular, management and staff involved in the procurement process should declare conflict of interest if they are closely related to, or have or will likely be perceived to have, beneficial interest in any company which is considering submission of quotation/tender to the Company or is being considered for selection as the Company's supplier of goods or services. 1.12 below provides some examples of conflict of interest situations which may be encountered and should be avoided by management and staff.

1.12 Examples of Conflict of Interest Situations:

- Management or a staff member takes part in the selection of suppliers or subcontractors, and one of the bidders under consideration is his relative or close personal friend.
- Management or a staff member has a financial interest in a company which is being considered for selection as the Company's supplier of goods or services, or is an existing supplier.
- Management or a staff member acquires dealership of goods or services on insider knowledge that such goods or services are being considered for procurement by the Company.
- Management or a staff member has beneficial interest in a supplier whose goods or services are being selected through an intermediary (e.g. a publicity agent) appointed by the Company.
- Management or a staff member selects contracting materials and services where his relative or close personal friends has management responsibility.
- Management or a staff member accepts frequent or lavish entertainment or expensive gifts from the Company's suppliers or contractors.
- Management or a staff member hires a relative as staff member, or is considering the promotion of such a person.
- Management or a staff member nominates a relative as office-bearer.

1.13 When called upon to deal with matters of the Company for which there is an actual or perceived conflict of interest, the management and staff should make a declaration in writing to his supervisor or the CEO. He should then abstain from dealing with the matter in question, and follow the instruction of his supervisor or the CEO who may (or may not) reassign the task to other management or staff.

Entertainment

- 1.14 As defined in Section 2 of the Prevention of Bribery Ordinance, “entertainment” refers to food or drink provided for immediate consumption on the occasion, and any other entertainment provided at the same time. Although entertainment is an acceptable form of business and social behaviour and is not “advantage”, management and staff member must not accept lavish or frequent entertainment from persons with whom the Company has official dealings (e.g. suppliers or contractors, subcontractors or any persons to which the Company may allocate resources or work assignments), so that they will not be placed in a position of obligation to the offerer.

Misuse of Official Position

- 1.15 Management and staff who misuse their official position for personal gains or to favour their relatives or friends or to benefit their business connections are liable to disciplinary action by the Company or even prosecution by the appropriate authorities. Examples of misuse include a management or a staff member responsible for the selection of suppliers giving undue favour or leaking tender information to his own or his relative’s company with a view to awarding the contract to the latter, or placing it in an advantageous position ahead of other competitive bidders. Other examples include requesting/accepting money/gifts from subcontractors and other parties without prior permission from the Company in return for bypassing the proper allocation/tendering procedures given by the Company, and unfair allocation of resources (e.g. award of contracts) to other subcontractors/parties for personal gain.

Handling of Classified or Proprietary Information

- 1.16 Management and staff are not allowed to disclose any classified or proprietary information to anybody without prior authorization by the Company. Management and staff who have access to or are in control of such information should at all times provide adequate safeguards to prevent its abuse or misuse. Examples of misuse include disclosure of information for personal interest or business benefits. It should also be noted that unauthorized disclosure of any personal data may result in a breach of the Personal Data Protection Act 2012 (PDPA).

Equipment, Stocks and Other Resources of the Company

- 1.17 Management and staff given access to any equipment, stocks or other resources of or acquired by the Company (such as inventory) should ensure that it is properly used solely for the purpose of conducting the Company’s business. Misappropriation or unauthorized use of such property or resources, such as for personal gain (e.g. resale of inventory) is strictly prohibited.

Gambling

- 1.18 Management and staff must not engage in frequent or excessive gambling with persons who have business dealings with the Company as well as among colleagues, particularly with subordinates. If on social occasions where refusal of gambling (provided that the activity is legal) is considered unsociable, the amount of money involved should not be significant. Gambling in the Company’s premises, work sites, warehouses and any locations where activities of the Company take place is strictly forbidden.

Outside Employment

- 1.19 Staff who wish to take up paid outside work, including those on a part-time basis, must seek the written approval of the Company before accepting job. Applications for outside work should be made to CEO for consideration. Approval will not be given if the outside work is in conflict with the interest of the Company.

Compliance with the Code

- 1.20 It is the personal responsibility of every management and staff to understand and comply with the Code of Conduct, in particular by conscientiously avoiding any conflict of interest, and making declaration and seeking prior permission from the Company in accordance with this Code in any case of exception.
- 1.21 The Company's management will ensure that Management and staff understand and comply with the standards and requirements stated in the Code. Any problems encountered as well as any suggestions should be channeled to CEO for consideration and advice.
- 1.22 Any Management and staff who violates any provision of the Code will be subject to disciplinary action, or termination of appointment / employment where warranted. In case of suspected corruption or other criminal offences, a report will be made to the CAD or the appropriate authorities.
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