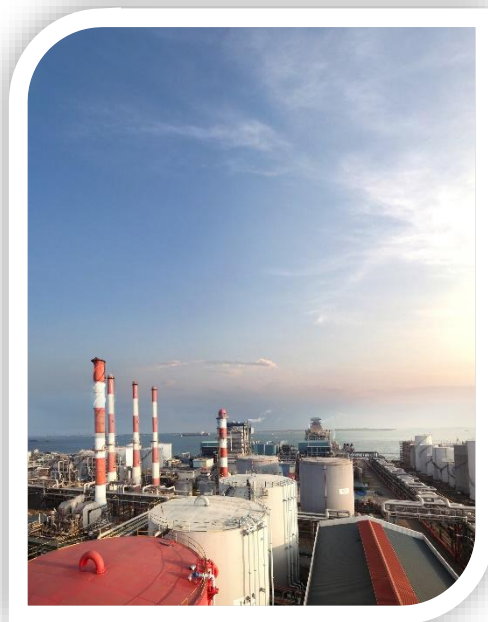




**Group  
Anti-bribery  
and Corruption  
Policy**



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## 1. Policy Statement

The Group Anti-bribery and Corruption Policy (“Policy”) sets out the guiding principles and standards that Sembcorp is committed to, with regard to conducting business with integrity and the highest ethical standards. We have zero-tolerance towards all forms of bribery and corruption and uphold all laws and regulations applicable to bribery and corruption. This includes the US Foreign Corrupt Practices Act (“FCPA”) and the UK Bribery Act 2010 (“UKBA”)¹.

### 1.1 Scope and Application

This Policy applies to Sembcorp Industries Limited and all its subsidiaries, affiliates, associate companies and joint ventures over which Sembcorp has control (hereinafter, collectively referred to as “**Sembcorp**” or the “**Company**”).

It also applies to all directors, officers, employees (permanent, temporary or contract), trainees, interns, seconded staff, agency staff, agents and third-party representatives acting on behalf of Sembcorp (collectively referred to as “**Sembcorp Personnel**”).

Associate entities and joint ventures which are not subject to Sembcorp’s control are strongly encouraged to

- (i) adopt this Policy and/or
- (ii) ensure that their existing policies incorporate principles which are consistent with and/or materially equivalent to those described in this Policy.

Any deviation from this Policy or subsequent changes must be approved by Sembcorp Group Ethics & Compliance division.

### 1.2 Consequences of Violations

A violation of this Policy or the Company’s Code of Conduct could result in disciplinary action, up to and including termination of employment.

## 2. General Principles

The Policy prohibits all forms of bribery including offering, promising, authorising, providing, soliciting or receiving anything of value to or from any customer, business partner, vendor, government official or government entity or other third party in order to induce performance or non-performance of an official act, secure undue advantage, or obtain or retain business. Personal funds must not be used to accomplish what is otherwise prohibited by this Policy.

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¹ The FCPA and UKBA may apply to conduct outside the United States or the United Kingdom

### 3. Facilitation Payments

The Company prohibits facilitation payments, which are payments to induce government officials to expedite or perform routine functions they are already obligated to perform.

### 4. Gifts and Hospitality

The Gifts and Hospitality Policy outlines the principles and guidance for giving or receiving gifts, hospitality, travel or accommodation between Sembcorp and persons acting on behalf of Sembcorp and external parties.

Such exchanges must comply with applicable laws and regulations, serve a legitimate business purpose, be reasonable, infrequent, and free of any intent or understanding, express or implied, that any business decision will be influenced thereby, and must not create the appearance of any such intent or understanding.

Giving or receiving of gifts or hospitality in the form of cash or cash equivalents is strictly prohibited.

### 5. Contributions, Community Investment, and Sponsorship

#### 5.1 Community Investment and Sponsorship

All Community Investment (CI) and sponsorship initiatives must adhere to the following principles:

- (i) CI and sponsorship initiatives must serve a bona fide purpose aligned with Sembcorp's initiatives, not for the personal benefit of any individual (including any Government Official). Payments to private or personal bank accounts must be avoided.
- (ii) Contributions should only be made in Sembcorp's name or in its order.
- (iii) Contributions must not be given in exchange for any purchasing decision or other decisions that may affect the Company's interests.
- (iv) All CI and sponsorship initiatives must be properly documented and recorded in the Company's books and records.

#### 5.2 Political Contributions

Sembcorp maintains a position of political neutrality. No monetary or non-monetary contributions may be made to any political party, politician, elected official or candidate for public office in any country or jurisdiction. In cases where contributions serve a legitimate and lawful purpose, they may be made only with prior approval as outlined in our Group Community Investment and Sponsorships Policy.

## 6. Counterparties

Sembcorp employees who wish to do business with a counterparty or vice versa are responsible for ensuring counterparty's identity and background are assessed and satisfactorily verified through our Know-your-counterparty (KYC) screening and due diligence process before signing any contract. This helps to mitigate risks associated with financial crimes, including money laundering, terrorism financing, bribery and corruption and other illicit schemes.

A "counterparty" refers to a legal entity or individual on the other side of a trade, financial or investment transaction. This may include, but is not limited to, joint venture partners, suppliers, customers, third party representatives or intermediaries, beneficiaries, third party payers and collateral providers.

All vendors or suppliers working with Sembcorp are expected to comply with the [Sembcorp Supplier Code of Conduct](#) and this Group Anti-bribery and Corruption Policy.

## 7. Conflict of Interest

Sembcorp employees and contracted third parties must declare any actual or potential conflicts of interest to the Company. Upon review, the Company may require the individual to recuse themselves from related matters.

All declarations will be assessed by the Sembcorp Group Ethics & Compliance division, which will determine whether a conflict of interest exists and advise the appropriate course of action.

Refer to Appendix A for the Counterparty Conflict of Interest Declaration Form.

## 8. Accounting and Record-keeping

All financial transactions must be properly authorised and recorded. Any benefits received, or payments and other compensation made to vendors, customers or third parties, must follow the Company's authorisation matrix and be accurately reflected in the Company's corporate books, records, and accounts in a timely manner and in reasonable detail.

Records must clearly describe the nature and purpose of each expense, and indicate the necessary approvals obtained.

False, misleading, incomplete, inaccurate, and/or artificial entries in the books, records, or accounts of the Company are strictly prohibited and can amount to a violation of this Policy and anti-bribery and corruption laws and lead to consequences as stipulated in Section 1.2.

## 9. Training and Certification

All of Sembcorp's existing and new employees are required to complete an annual training on the Code of Conduct and Anti-bribery and Corruption Policy. The training ensures employees are up to date on the requirements and obligations of the anti-bribery and corruption laws and this Policy.



Following the training, employees are required to declare that they have understood the content and commit to comply with the Code and its related policies and procedures. In addition, targeted training sessions are provided for employees in higher risk roles or with significant compliance responsibilities.

## 10. Monitoring

The Group Ethics and Compliance division periodically monitors the effectiveness and implementation of this Policy through reviews of related risks, controls, systems and procedures. Data analytics are used to detect trends and anomalies that may require further action. The monitoring process is guided by the Integrated Assurance Framework (IAF) with Key Risk Indicators (KRIs) established and reported regularly to the Senior Leadership Council and Audit Committee.

## 11. Reporting of Suspected or Actual Bribery Concerns

All stakeholders including employees who observe or suspect any misconduct or breach of this Policy are encouraged to report their concerns to the Group Ethics and Compliance division at [compliance@sembcorp.com](mailto:compliance@sembcorp.com) or via Sembcorp's whistleblowing portal at <https://wbportal.sembcorp.com/home/index> or by email to Group Integrated Audit at [gja.cases@sembcorp.com](mailto:gja.cases@sembcorp.com)

All cases reported will be treated in confidence, investigated with appropriate follow-up actions and in accordance with Sembcorp's Whistleblowing Policy. There will be no retaliation against anyone who reports a violation or suspected misconduct in good faith.

Any Sembcorp employee who fails to report a known violation of this Policy may face disciplinary action, up to and including termination of employment.

## 12. Inquiries

For questions about Sembcorp's Group Anti-bribery and Corruption Policy, please email to Sembcorp's Group Ethics and Compliance division at [compliance@sembcorp.com](mailto:compliance@sembcorp.com)

*Note: This is an abridged version of the Group Anti-bribery and Corruption Policy. Employees should refer to the full version of this Policy available in the company intranet.*

## Appendix A

### Counterparty Conflict of Interest Declaration Form

Counterparties conducting business with Sembcorp Industries and its affiliated Companies must complete and submit the Conflict of Interest Declaration Form if there is a potential, perceived or actual conflict of interest.

Please submit a signed copy of this form to Group Ethics & Compliance (compliance@sembcorp.com). We will review and assess your declaration, and advise any mitigation actions to be taken, if necessary. Relevant Sembcorp personnel or department impacted will be informed if they are affected. In other situations, Sembcorp may contact you for further details, if needed.

Company Name (Full Legal Name):	
Country of Incorporation:	
Registered Address:	
Contact (Email):	
Contact (Phone):	

To the best of my knowledge and belief,

- The owner, director or senior management of my company / business (sole proprietor) or the company I work in, is currently an employee or a director of Sembcorp or its subsidiaries?

☐ Yes ☐ No

If yes, please provide details in the table below

- The owner, director or senior management of my company / business (sole proprietor) or the company I work in, has a 'Closely Related Person' to an employee or a director of Sembcorp or its subsidiaries?

☐ Yes ☐ No

If yes, please provide details in the table below

**'Closely Related Persons'** is defined as a Person's family members such as spouse, partner, parents, children, stepchildren, adopted children, siblings, parents-in-law, grandparents, and spouses of each of the aforementioned Persons, and all other relatives related by blood or by law.

	Details	
Name (Employee of your Company):		
Position/Title in your Company:		
Name (Employee of Sembcorp):		
Position/Title in Sembcorp:		
Relationship:		
Sembcorp Business Unit Name:		

- Other COI

☐ Yes

☐ No

If yes, please provide details in the table below

	Details	
Individual/ Company name		
Please describe the situation that has or may give rise to an actual, potential or perceived conflict of interest.		

By signing this document, the undersigned, being duly authorised to complete this declaration form, hereby certify the following:

- consent Sembcorp to storing, processing and transferring the above information in accordance to applicable laws and regulations;
- acknowledge that Sembcorp may seek to independently confirm the statements made in this document;
- represent that the facts and information provided in this document is, to the best of his/her knowledge are accurate, current and complete as of the date of disclosure;
- ensure the undersigned or personnel comply with the Sembcorp's Supplier Code of Conduct, when carrying out the obligations under the Contract with Sembcorp. In particular, the Counterparty must immediately disclose to Sembcorp any conflict or potential conflict of interest that arise and acknowledge the obligation to recuse and/or mitigate any actual, perceived or potential conflict of interest.

Signed by the authorised representative of the Company:

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Signature and Date

Name & Designation: