



# **ST Engineering Supplier Code of Conduct**

Updated as of 29 Dec 2025

## Introduction

ST Engineering and its Group of Companies (ST Engineering) are committed to maintaining a sustainable and ethical environment that promotes professional and ethical conduct of its management and employees, customers, business partners and other stakeholders.

We recognise our dependency on our suppliers for timely delivery of sustainable quality products and services. We actively manage our supplier relationships to build a resilient and sustainable supply chain by procuring supply of goods and services ethically and responsibly.

This [Supplier Code of Conduct](#) (Supplier Code) is aligned with our [sustainability](#) agenda, defines our principles and policies, and lays down the basic requirements in behaviours and practices we require of our suppliers, including those pertaining to their responsibilities towards their stakeholders and the environment.

While conducting business directly or indirectly with and/or on behalf of ST Engineering for the benefit of our customers, our suppliers (including their parent entities, subsidiaries, affiliate entities, employees, subcontractors and other relevant third parties) are to commit to comply with the principles and standards expressed in this Supplier Code. They are also responsible to ensure that this Supplier Code and its principles and standards, are clearly communicated to their employees, subcontractors and any other relevant third parties in a manner and/or language that is being understood by all. ST Engineering expects all our suppliers to embody these sustainability-aligned principles and standards in their own procurement policies and to cascade these principles and standards through their own supply chain.

If a supplier violates any of the requirements contained in this Supplier Code, ST Engineering reserves the sole right to discontinue its business relationships with such suppliers (including terminating any existing contracts), and ST Engineering shall not be liable for any claims for losses or damages resulting therefrom.

## Environmental

ST Engineering expects our suppliers to protect the environment by conserving the use of resources, ensuring that their operations are efficient, controlling waste and effluents stringently, and developing greener products and services, including as follows:

1. Environmental Sustainability
  - a. Comply with all applicable environmental laws and regulations, such as those relating to waste disposal, air emissions and pollution;
  - b. Comply with all [environmental requirements](#) set by ST Engineering;

- c. Subscribe to green environmental practices in the design, production, delivery and aftersales support of products and services as applicable;
- d. Operate in a manner that actively conserves natural resources, and protects the environment;
- e. Reduce greenhouse gas (GHG) emissions through performance and efficiency measures on a business as usual basis; and
- f. Has implemented an internationally-recognised Environment Management System, such as ISO 14001 or its equivalent, where applicable.

## 2. Business Continuity

- a. Actively manage business disruption risks arising from climate change, natural and man-made disasters, pandemics, cyber attacks, etc., to minimise impact on the delivery of products and services;
- b. Has implemented an internationally recognised Business Continuity Management System, such as ISO 22301 or its equivalent, where applicable; and
- c. Requires of their suppliers and subcontractors to likewise, actively manage business disruption risks.

## **Social**

ST Engineering has zero tolerance for unethical labour practices and expect all our suppliers to provide a safe and healthy working environment, fair compensation and employee development. We expect our suppliers to uphold and respect the fundamental human rights of all individuals, as outlined in our company's [Human Rights Framework](#). Suppliers are expected to deliver quality products and services, source ethically and responsibly, and support the communities where they operate, including as follows:

## 3. Product Quality and Safety

- a. Demonstrate a commitment to quality and apply appropriate product safety practices in compliance with applicable laws, regulations, industry standards and good manufacturing practices that seek to reduce risk of hazards to their employees and subcontractors, our employees, our customers, our end users, the public, properties and the environment;
- b. Ensure their products and services meet or exceed ST Engineering's quality standards and contractual requirements;

- c. Has processes in place to prevent the risk of incorporating counterfeit parts and materials into their delivered products. Suppliers must provide immediate notification if counterfeit parts are detected or suspected; and
  - d. Has implemented an internationally recognised Quality Management System, such as ISO 9001 or its equivalent, where applicable.
4. Inclusivity, Non-Discrimination and Anti-Harassment
  - a. Respect and support the fundamental principles set out in the following principles:
    - [United Nations Universal Declaration of Human Rights](#)
    - [International Labour Organisation's Declaration on Fundamental Principles and Rights at Work \(ILO Declaration\)](#)
    - [United Nations Global Compact \(UNGC\)](#)
    - [United Nations Guiding Principles on Business and Human Rights \(UNGPs\)](#);
  - b. Provide equal employment opportunities to their employees and applicants for employment without discrimination based upon age, race, religion, national origin, ethnic and social background, gender, marital status, physical or mental attributes; and
  - c. Ensure that their employees are afforded an employment environment that is free from any physical abuse, threats of physical violence, sexual or other forms of harassment including verbal or other forms of psychological abuse and intimidation.
5. Ethical Labour Practices & Freedom to Associate
  - a. Take measures to eliminate all unethical labour practices, including child labour, forced labour, modern slavery, and human trafficking, within their operations and ensure that these standards are upheld through their own supply chain; and
  - b. Recognise and respect the rights of their employees to associate freely and to organise and bargain collectively in accordance with the local laws in which they are employed.
6. Workplace Safety & Health
  - a. Provide a safe and healthy working environment for their employees;
  - b. Comply with all applicable health and safety laws and regulations;
  - c. Comply with all workplace safety and health requirements as per our Workplace Safety & Health (WSH) Policy. Suppliers and their subcontractors operating onsite must adhere to these requirements, failing which suppliers may be subject to disciplinary actions;

- d. Not engage in violence, harassment or threatening behaviour towards their employees and subcontractors;
  - e. Prohibit the use of illegal drugs by their employees and subcontractors; and
  - f. Has implemented an internationally-recognised Occupational Health & Safety Management System, such as ISO 45001 or its equivalent (e.g., bizSAFE level 3 and above for companies in Singapore), where applicable.
7. Wages & Working Hours
- a. Employees shall be fairly compensated for all hours worked and in compliance with all applicable laws and regulations; and
  - b. Working hours, rest periods and paid leave shall comply with all applicable laws, standards and practices.
8. Conflict Minerals
- a. Take steps to determine if their products contain conflict minerals (tin, tantalum, gold, and tungsten) and if so, implement supply chain due diligence processes to identify sources of conflict minerals and support efforts to eradicate the use of conflict minerals which directly or indirectly finance or benefit armed conflicts; and
  - b. Provide supporting data on their supply chain sources for these minerals when requested.
9. Community & Stakeholders
- a. Seek opportunities to help support, sponsor and contribute to the well-being and sustainability of their local communities through volunteerism, charitable giving and civic activities; and
  - b. Listen carefully to requests or concerns from their stakeholders and address them appropriately.

## **Governance**

ST Engineering is committed to good corporate governance and has zero tolerance for fraud and corrupt practices. Our suppliers are expected to do business with full transparency by adhering to our [Code of Business Conduct and Ethics](#) and observe the following:

10. Zero Tolerance for Corruption
- a. Not offer, give, accept or promise any sort of bribe, facilitation payment or kickback that may be viewed as, or has the effect of, improperly influencing business decisions;

- b. Comply with all applicable anti-bribery and corruption laws and regulations of the countries in which they operate and conduct business in; and
- c. Report all suspected cases, actual breaches or concealment of any forbidden acts.

#### 11. Gifts & Hospitality

- a. Compete on the merits of their products and services;
- b. Avoid any business hospitality and gifts that may be used as an attempt to influence, or be perceived by others to influence business decisions or official actions; and
- c. Ensure that the offering of any gift or hospitality is permitted by law and regulation, and that these exchanges do not violate the rules and standards of the recipient's organisation and are consistent with reasonable marketplace customs and practices.

#### 12. Conflicts of Interest

- a. Avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest; and
- b. Provide notification to all affected parties in the event that an actual or potential conflict of interest arises, including conflicts between the interest of ST Engineering and personal interests or those of close relatives, friends or associates.

#### 13. Political Contributions and Donations

- a. Refrain from making any corporate contributions or donations to political candidates, or political officials or political parties, intended as, or that may be perceived as, attempts to influence business decision making.

#### 14. Trade Embargoes, Sanctions and Export Controls

- a. Comply with applicable national and international trade control laws and regulations when importing and exporting products, services, technology and information; and
- b. Possess up-to-date knowledge about international restrictive measures, controls and sanctions (or embargoes) adopted against certain countries, governments, organisations, entities, companies, individuals or assets; and do not engage in business with them, when doing so is prohibited by applicable laws and regulations.

15. Competition, Antitrust and Fair Dealing

- a. Act in accordance with the competition, antitrust and similar laws in the countries where they operate or market and sell their products or services; and
- b. Avoid unlawful agreements or understanding that improperly limit or control production or price fixing, bid rigging, market allocation, limit or control production in a way that improperly restricts competition.

16. Security

- a. Safeguard ST Engineering assets from waste, loss, damage, theft, unauthorised disclosure, mis-use or infringement, through appropriate physical and electronic security procedures;
- b. Protect and safeguard information and intellectual property rights referred to in paragraph 17, 18 & 19 below through appropriate physical and electronic security procedures, including mitigating risk to information systems by implementing appropriate IT cyber security measures and practices. Any suspected or actual data breaches must be reported immediately to ST Engineering as soon as they occur or become aware; and
- c. Follow all requirements set by ST Engineering's security policies and regulations when carrying out activities on our premises, or within our facilities.

17. Third Party Information

- a. Respect intellectual property rights and safeguard all third-party information, including that of our customers and collaborators;
- b. Not use information for any purpose (e.g., advertisement, publicity, and the like) other than the business purpose for which the information was provided, unless there is prior authorisation from the owner of the information; and
- c. Comply with all applicable laws governing intellectual property rights assertion, including protection against disclosure, patents, copyrights, and trademarks.

18. Personal Information

- a. Protect personal information confidentiality and comply with all applicable data privacy laws and regulations when personal information is collected, stored, processed, transmitted, or shared.

19. Official or Classified Information
  - a. Not directly or indirectly disclose, copy, extract or translate, publish or show official or classified information to any third party in any form whatsoever without the prior written permission of ST Engineering; and
  - b. Comply with all applicable national and international laws and regulations regarding the safeguarding of government official or classified information.
20. Insider Information
  - a. Not use any material or non-publicly disclosed information obtained in the course of business dealings with ST Engineering as the basis for trading or for enabling others to trade in the stock or securities of any company.
21. Records
  - a. Create accurate records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it;
  - b. Document all business transactions fully and accurately to represent the transactions or events being documented; and
  - c. Retain records based on retention requirements in accordance with applicable laws, regulations and industry standards.
22. Monitor and Evaluate
  - a. Allow ST Engineering to, from time to time, conduct onsite evaluations and inspections at suppliers' facilities, and/or those of their subcontractors supporting our contracts or operations.
23. Whistle Blowing
  - a. Be familiar with [ST Engineering's whistle blowing policy and channels](#); and
  - b. Report any wrongdoing, in good faith, without the fear of retaliation through our whistle blowing channels.

### **Communication**

Should the supplier has any concerns with the requirements of this Supplier Code, or suspect that they might be in breach of any of the principles, it is the supplier's responsibility and obligation to proactively inform their assigned ST Engineering counterpart or contact the Group at [vm.centralproc@stengg.com](mailto:vm.centralproc@stengg.com).

This Supplier Code will undergo regular review and updates as necessary to ensure its continued relevance and effectiveness.

## **General Provisions**

### **24. Prevailing Language**

If there is any inconsistency between the English and a different language version of the Supplier Code, the English language version shall prevail at all times.