

YCH Group

Code of Business Conduct & Ethics

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1 Policy Statement

YCH Group is committed to conducting business with integrity, transparency, respect, and accountability. Guided by our R.I.S.E. values of Reliability, Integrity, Sincerity, and Enterprise, we uphold the highest standards of ethical conduct in all business dealings.

We conduct business in compliance with applicable laws, regulations, and internal policies. We strive to build trust with our customers, suppliers, business partners, colleagues, regulators, and the communities in which we operate.

2 Purpose

This Code sets out the minimum standards of ethical conduct expected across YCH and relevant third parties acting on our behalf. It supports lawful, responsible, and fair decision-making across the Group.

This Code is not intended to cover every situation. Where doubt exists, respective personnel should seek guidance before acting.

3 Scope

This Code applies to YCH Group Pte Ltd and all subsidiaries and affiliates controlled directly or indirectly by YCH Group. It applies to all directors, officers, employees, contractors, consultants, agents, and other representatives acting on behalf of YCH, unless a stricter or specific contractual requirement applies.

Where local law, collective agreement, or another YCH policy requires a higher standard, the stricter requirement will be followed.

4 How We Work

All employees are responsible for reading, understanding, and complying with this Code and the laws and policies relevant to their work. Employees are required to participate in the relevant training, ask guidance when unsure, report suspected violations, and cooperate fully in any investigation. All employees are required to complete the mandatory annual COBCE and PDPA refresher programme.

Managers and leaders are expected to set the right example, reinforce ethical conduct, and foster an environment where employees feel safe to raise concerns.

Non-compliance with this Code shall result in disciplinary action.



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Our Shared Sustainability and Responsible Business

We are committed to responsible business practices that support long-term value creation, operational resilience, and positive impact for our customers, employees, communities, and other stakeholders. All relevant personnels are to make decisions that reflect integrity, accountability, and respect for people, business partners, and the environment.

Sustainability and responsibility are part of how we work, how we serve, and how we grow as a trusted organisation. Broader impact of our decisions shall be considered and to act in ways that support the Company's long-term reputation and sustainability.

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Integrity in Business Conduct

We do not tolerate bribery, corruption, fraud, false records, misuse of company resources, money laundering, financing of terrorism or any other unethical conduct. We will not offer, give, request, or accept any improper benefit intended to influence a business decision or create an unfair advantage.

We do not permit facilitation payments unless there is an immediate threat to health, safety, liberty, or the environment, and the matter has been reviewed and approved in accordance with company requirements.

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Gifts and Hospitality

We ensure that gifts, hospitality, meals, entertainment, and similar benefits are always modest, lawful, transparent, and for a genuine business purpose. They must never influence, or appear to influence, any business decision or tender process.

We prohibit cash or cash-equivalent items. We ensure that gifts and hospitality above approved limits, or in sensitive situations, are declared and approved in accordance with company procedures.

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Conflict of Interest

We avoid any actual, potential, or perceived conflict between personal interests and the interests of YCH. This includes outside business interests, financial interests in suppliers or competitors, personal transactions, improper gifts, misuse of company property, or using confidential business opportunities for personal gain.

Where conflicts arise, we disclose them promptly and take appropriate steps to manage the situation as required.

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Financial Integrity

We ensure that all funds, transactions, and records are accurate, complete, and properly authorised. We do not falsify, conceal, divert, or misuse company funds or accounting records.

We report any suspected fraud, theft, or misuse of funds immediately through the appropriate reporting channels including to management, HR, or the relevant compliance contact.



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Fair Competition

We compete fairly and ethically and do not engage in price-fixing, bid rigging, market sharing, illegal boycotts, misleading advertising, trade libel, or theft of trade secrets.

We escalate any concerns involving competitors, customers, or suppliers immediately, especially where there is a risk of anti-competitive conduct.

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Directorships and Outside Work

We ensure that our employees do not hold external directorships, side jobs, or other external positions that conflict with their responsibilities to YCH. Any permitted outside appointment or secondary activity are declared and approved in advance.

We comply with all applicable employment and regulatory requirements, including restrictions on secondary employment where required by law or work pass conditions.

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Confidentiality and Data Protection

We may have access to confidential, proprietary, customer, and business information during the course of our work. We protect such information, use it only for legitimate business purposes, and do not disclose it without proper authorisation.

This obligation continues during and after employment. Where third-party disclosures are required we consult the appropriate business or legal contact and ensure suitable confidentiality protections are in place. For matters relating to personal data, refer to YCH's Privacy Policy.

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Company Assets and Intellectual Property

We protect YCH's intellectual property, including any trademarks, copyrights, and patents to the maximum extent permissible. We prevent unauthorized use of YCH intellectual property by third parties and report any potential violations to the Corporate Legal Department. Where any work product may be entitled to intellectual property protections, contact the Corporate Legal Department for assistance.

We also respect the intellectual property rights of others and do not misuse intellectual property and copyright belonging to another for any reason.



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Respect at Work

We are committed to a workplace that is respectful, fair, and free from harassment, bullying, discrimination, or inhumane treatment. We support human rights, responsible employment practices, freedom of association where lawfully protected, and a fair workplace environment.

We treat others with dignity, act professionally, and contribute to a safe and inclusive work culture.

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Speak-Up and Reporting

We raise concerns when we suspect misconduct, a policy breach, or an unsafe or unethical practice. Concerns may be raised with a manager, Head of Department, HR, Legal, or through YCH's [Whistleblowing Policy](#).

YCH will handle reports seriously and confidentially to the extent permitted by law. Retaliation against anyone who raises a concern in good faith will not be tolerated.

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Related Policies

This Code should be read together with the YCH Employee Handbook, Human Rights Policy, Workplace Fairness Policy, [Whistleblowing Policy](#), [Privacy Policy](#), [Security Policy](#), and [Disciplinary Policy](#).