

Rev1 (09 December 2020)

Business Conduct and Ethics Code

Singapore Refining Company Private Limited



Table of Contents

1. MESSAGE FROM GM & CEO	3
2. ABOUT SRC’s BUSINESS CONDUCT AND ETHICS CODE.....	4
2.1 Our Core Values	4
2.2 Ethical Decision Making.....	4
3. OUR ROLES AND RESPONSIBILITIES	5
3.1 Authority	5
3.2 Guidance	5
3.3 Compliance	5
3.4 Reporting of Violations.....	5
3.5 Non-Retaliation Policy	6
4. OUR WORK CULTURE	7
4.1 Diversity and Inclusion	7
4.2 Employee Remuneration and Equal Opportunity	7
4.3 Drugs and Alcohol.....	8
4.4 Workplace Violence and Harassment	8
5. INTERNAL CONTROLS AND RISK MANAGEMENT	9
5.1 Internal Controls	9
5.2 Risk Assessment.....	10
5.3 Audits.....	10
5.4 SRC’s Books, Records and Accounts	10
5.5 Fraud	11
6. CONFLICTS OF INTEREST.....	12
7. MANAGING EXTERNAL INTERACTIONS AND RISKS.....	13
7.1 Transparent Procurement and Counterparty Due Diligence	13
7.2 Anti-bribery and Anti-corruption	14
7.3 Political Involvement and Contributions	14
7.4 Anti-competition.....	15
7.5 International Trade and Anti-boycott Laws.....	15
8. HEALTH SAFETY ENVIRONMENT & QUALITY POLICY	17
9. DATA PRIVACY	18
9.1 Personal Data.....	18
9.2 Handling Personal Data.....	18

10. MANAGING INFORMATION AND INTELLECTUAL PROPERTY	19
10.1 Proper Access and Use.....	19
10.2 Handling Sensitive or Proprietary Information.....	20
10.3 Retaining or Discarding Company Records	21
10.4 Retrieving Information for Litigation Purposes	21
10.5 Using Computer Systems or Other Technical Resources.....	22
10.6 Using Email and the Internet	22
10.7 Using Social Media	23

In this publication, unless otherwise defined or the context otherwise requires:

(a) “SRC” and “Company” refers to Singapore Refining Company Private Limited and the expressions “we”, “us” and “our” are used to refer to SRC and SRC personnel; and

(b) “the Code” shall mean this Business Conduct and Ethics Code.

1. MESSAGE FROM GM & CEO

While SRC demands the highest level of performance and personal commitment from each employee, teamwork and *esprit de corps* are equally fundamental in its pursuit of success. Safety, above all, is the primary core value for the entire company.

Long-term relationships built on trust and mutual advantage are imperative to SRC's business success. The refinery is committed to maximizing benefits for all parties in its business dealings. To become the preferred business partner, SRC seeks to uphold a sustainable relationship with its business associates based on high-performance standards, delivering on its promises, openness and flexibility, learning from others, mutual understanding and interdependence, as well as sharing success.

SRC employees operate according to principles governed by the Company's core values and these core values underpin SRC's Business Conduct and Ethics Code (the "Code"). The Code serves as a guide in helping us make the right decisions, providing sound advice and defining how we can conduct our business activities with honesty, integrity and mutual respect.

SRC Board of Directors and staff are expected to review the Code periodically and apply them to all areas of their work, while SRC business partners are required to respect, act in alignment and comply with the Code.

To play your part in building and sustaining an ethical and compliance culture in SRC, you are encouraged and expected to read and understand the Code, as well as make it your commitment to act consistently and in accordance with its provisions.

The Code may not provide guidance in every situation; if you have any doubt understanding its application, please do not hesitate to seek advice from your supervisor, section manager or department manager.

All should take note that no one in SRC has the authority to make any exception with respect to the principles set out in the Code, regardless of the situation or circumstances to which we are subjected in the course of performing our work.

Thank you.



William Lewis Stone
General Manager and Chief Executive Officer

2. ABOUT SRC'S BUSINESS CONDUCT AND ETHICS CODE

SRC's Business Conduct and Ethics Code is built on our core values. The Code sets out the principles that guide our business conduct. It applies to any staff who works for or represents SRC, with the Company committed to ensuring that all comply fully with applicable laws, rules and regulations pertaining to SRC's business operations. SRC is fully committed to upholding the highest standards of business conduct and ethics in the relationships with our business partners such as vendors, contractors, customers, shareholders, the community at large and regulatory agencies. At the same time, SRC requires all our business partners to respect, act in alignment and comply with the Code.

When we play our part in complying with the Code, we demonstrate our commitment to protecting and upholding SRC's interests and reputation.

2.1 Our Core Values

- Safety above all to protect people, assets and the environment.
- Reliability focused to deliver organizational performance.
- Customer satisfaction in quality products and services.
- Business orientation to ensure our continuing success.
- Teamwork to achieve common goals.
- Recognition of employee contribution and development of their potential.
- Pride and ownership in our work.
- Continuous improvement as our way of life towards excellence.

2.2 Ethical Decision Making

As we conduct our business, we are required to make decisions and carry out actions that are ethical and which exhibit the following characteristics:

- It is consistent with our core values;
- It is legal and complies with applicable laws, rules and regulations;
- It complies with our policies and procedures; and
- It does not compromise SRC's reputation or put SRC at risk should the decision or action become public knowledge.

3. OUR ROLES AND RESPONSIBILITIES

Regardless of the nature of our jobs, all of us must read, understand and abide by the Code no matter where we physically work or conduct our business activities. It is our responsibility to attend any training assigned to us which is intended to enhance our understanding of the Code.

We are required to know the party to turn to for clarification of any doubt in our understanding of the Code as well as for reporting of potential instances of compliance violations, fraud, abuse or misappropriation.

3.1 Authority

Where there is authority vested in us through our job functions, we must understand and ensure that we act only within the limits of our delegated authority.

3.2 Guidance

- The Code may not address every situation, nor does it contain all our corporate policies and procedures;
- It sets up the standards expected of us to uphold in our behaviors and conduct of business activities;
- A simple integrity check, using the guidelines in Section 2.2 on Ethical Decision Making, should be undertaken if we encounter problematic or potentially problematic situations or dilemmas;
- If in doubt as to understanding or application of any part of the Code, we must seek further guidance or advice; and
- In addition, some of the issues encountered in our jobs may require more detailed knowledge of a particular compliance-related topic than the Code provides; in such cases, we must seek further guidance from supervisors, section managers or department managers or further legal guidance if in doubt.

3.3 Compliance

Any violations of the Code may subject violators to disciplinary action including summary dismissal in accordance with the Company's personnel policy on Misconduct/Disciplinary Procedures. Where it is warranted, such violation may be reported to relevant authorities and may result in legal action or criminal prosecution.

3.4 Reporting of Violations

SRC shall not tolerate any action in which achievements or results are sought or attained at the expense of violating the law or compromising the Code.

We must speak up and promptly report anyone including those of higher authority when there is reason to suspect that person has acted in violation of the Code, Company's policies and internal controls, or applicable laws and regulations. We must also report any activity that risks damaging SRC's reputation. This is to enable the Company to conduct timely investigations and take appropriate corrective actions.

Reporting of known or potential violations or concerns can be done through the following channels as set out in the Company's Whistle Blowing Policy which includes reporting to:

- a) Employee's immediate supervisor;
- b) Head of departments or department manager;
- c) Internal Audit Manager;
- d) General Manager & Chief Executive Officer; or
- e) Audit Committee Chairman.

3.5 Non-Retaliation Policy

We can raise concerns, complaints and make reports without fear of adverse personal consequences, as long as we have acted in good faith. Deliberately constructed falsehoods that consciously disregard the truth are however unacceptable behaviors, and the Company reserves the right to take disciplinary action if warranted. All persons responding to concerns, complaints and reports of known or potential violations must exercise appropriate discretion, protecting anonymity and maintaining confidentiality as far as possible to the extent that it is practicable. Acts of retaliation or reprisal by employees against an individual who has reported a known or potential violation shall not be tolerated, and such employees shall be subject to disciplinary action by the Company.

For additional guidance

SRC ISO Documents:

- [MPP 5.03-E Whistle Blowing Policy](#)
- [E&IR 1.10 Misconduct/ Disciplinary Procedures](#)

4. OUR WORK CULTURE

SRC aims to create an extraordinary working environment that is safe, diverse, inclusive, cohesive and creative by nurturing through teamwork, innovation and continuous improvements, employees with resilience to overcome challenges and who are capable of high performance. To that end, we must do our part by demonstrating utmost honesty, integrity as well as mutual respect in our conduct and interactions with one another.

4.1 Diversity and Inclusion

Everyone who works for SRC contributes to our success. We want to have an inclusive environment that values the uniqueness and diversity of individual talents, experiences and ideas. By working together and drawing from our diverse talents and perspectives, we can stimulate creative ideas and generate a more exciting and rewarding working environment where everyone feels responsible for the performance and reputation of SRC.

Our Responsibilities

- *We must treat everyone as equals and with respect;*
- *We must work with everyone in SRC without discrimination of any kind as to race, skin color, religion, nationality, age, sex, gender identity, expression/sexual orientation or other basis prohibited by applicable laws or regulations; and*
- *We must report immediately to Human Resource department, or as per Section 3.4, if we observe or are subject to any acts of discrimination which we believe amount to harassment or victimization.*

4.2 Employee Remuneration and Equal Opportunity

SRC aims to promote and sustain a high-performance, high-commitment, team-oriented and value-driven organizational culture in SRC and our remuneration package is designed to attract, develop, motivate, reward and retain high-performing employees to achieve SRC goals and objectives. SRC is committed to fair employment practices, in alignment with government recommendations and applicable laws and regulations.

Our Responsibilities

- *We will open our employment opportunities to all who are suitable, and treat job applicants as well as employees equitably;*
- *We will make employment decisions based on objective and relevant considerations such as qualifications and work experience to demonstrate suitability for the position, and nature of the work and performance; and*
- *We must report immediately to Human Resource department, or as per Section 3.4, if we observe or are subjected to any acts of discrimination which we believe amount to unfair or unjustifiable treatment.*

4.3 Drugs and Alcohol

The misuse of legitimate drugs, or the use, possession, distribution or sale of illicit or unprescribed controlled drugs on Company premises is strictly prohibited. Possession, use, distribution, or sale of alcoholic beverages is also prohibited. This policy is intended to apply to inhalants and all other substance of abuse.

Where permitted by law, SRC may conduct unannounced searches for drugs and alcohol, as well as periodic or random testing on any person for drug and alcohol use or where cause exists to suspect alcohol or drug use in work place incidents on property owned or controlled by the Company.

4.4 Workplace Violence and Harassment

SRC is committed to providing a work environment that fosters mutual respect and ensures that working relationships are free of harassment.

We will not tolerate any form of harassment; and actual or threatened violence of any kind and against anyone at our premises is strictly prohibited.

Such prohibited behavior can constitute offences under the Penal Code and/or the Protection from Harassment Act.

Our Responsibilities

- *We must not enter Company premises and/or engage in business for the Company when we are under the influence of drugs or alcohol, as this may compromise our safety and wellbeing;*
- *We must seek advice and follow appropriate treatment promptly if we suspect we have an alcohol or drug dependency before it results in job performance problems;*
- *Violation of the provisions relating to SRC's policy on alcohol and drugs shall subject offenders to appropriate disciplinary action; and*
- *We must report immediately to Human Resource department, or as per Section 3.4, any incident of suspected or actual abuse of drug or alcohol.*

Our Responsibilities

- *We must not engage in any violence against anyone or threaten anyone;*
- *We must not engage in any forms of harassment, which include but are not limited to making unwelcomed verbal or physical advances as well as sexually, racially, derogatory or discriminating materials, statements or remarks; and*
- *We must report immediately to Human Resource department, or as per Section 3.4, any incident of actual or suspected violence and harassment which we are aware of or are subjected to.*

For additional guidance

SRC ISO Documents:

- *[E&IR 5.01 Drugs & Alcohol](#)*

5. INTERNAL CONTROLS AND RISK MANAGEMENT

SRC is committed to designing and maintaining a reliable, effective and efficient system of internal controls to provide reasonable assurance relating to operations, reporting, and compliance in the pursuit of Company's business objectives. The principles are applied at the operating, functional and entity level; and everyone is responsible to identify, mitigate and manage risks to acceptable levels, support sound decision making and ensure proper corporate governance.

SRC's system of internal controls comprises 5 key integrated components:

- **Control Environment**
Establish the tone at SRC Board of Directors and senior management level regarding the importance of internal controls and the expected standards of conduct to uphold the integrity and ethical value of the Company;
- **Risk Assessment**
Establish a dynamic process to identify and assess risks to the achievement of the Company's objectives;
- **Control Activities**
Establish the Company's actions through policies and procedures that help ensure management's directives are being carried out to mitigate the identified risks to the achievement of objectives;
- **Information and Communication**
SRC generates and uses quality information and communicates throughout the Company and with external parties to deliver a clear and consistent message that control responsibilities must be taken seriously to support the achievement of its objectives; and
- **Monitoring Activities**
Conduct on-going evaluations to ascertain that the components of internal controls are present and functioning as intended.

5.1 Internal Controls

Internal controls is a process designed to provide reasonable assurance regarding the achievement of Company's objectives relating to operation, reporting, and compliance. New and rapidly changing business demands, greater use of technology, increasing regulatory requirements and scrutiny, and other challenges demand that any system of internal controls need to be agile in adapting to changes in business, operating and regulatory requirement.

Our Responsibilities

- *We must understand that the application of internal controls expands beyond financial reporting to other forms of reporting, operations and compliance objectives;*
- *We must understand the internal controls relevant to our functional roles and carry out the actions set out in the policies and procedures towards mitigating business risks;*
- *We must make a report as per Section 3.4, if we suspect that a control does not adequately detect or prevent inaccuracy, waste or fraud.*

5.2 Risk Assessment

SRC identifies risks to the achievement of its objectives across the organization and analyses the risks as a basis for determining how the risks are to be managed effectively. Along with the identification and assessment of risks, SRC also considers the potential for fraud and any changes to business operations that can significantly impact the system of internal controls.

5.3 Audits

Audits performed by our internal and external auditors help to provide SRC management and SRC shareholders with an independent and objective assessment and to improve effectiveness of risk management, controls, and governance processes to achieve SRC objectives. Auditors are granted unrestricted access to SRC's records, assets & personnel during the audit.

5.4 SRC's Books, Records and Accounts

SRC's books, records, and accounts must be kept in sufficient detail to fairly, accurately and honestly reflect the Company's transactions and disposition of assets.

The Company's transactions must be recorded, and the financial statements must be prepared to give a true and fair view in accordance with provisions of the Companies Act, Chapter 50 and Financial Reporting Standards in Singapore.

Our Responsibilities

- *We must carry out on-going risk assessment to ensure the system of internal control is effective and efficient and provides value in reducing risks to the achievement of the Company's objectives.*

Our Responsibilities

- *We must provide necessary assistance to and co-operate with the auditors in the performance of their duties.*

Our Responsibilities

- *We, as individuals who contribute to the creation of business transactions, share the responsibility of the accountants who prepare records in ensuring that these records are prepared accurately and honestly and are complete with proper documentation; and*
- *We must undertake the management of the Company's financial matters and control of its business risks at the highest professional standard.*

5.5 Fraud

Engaging in any scheme to defraud anyone of money, property or honest services violates SRC policy and the law, carrying severe penalties. These include dishonest or fraudulent activities like misusing or misappropriating company assets, and falsifying a travel and entertainment expense report, among other violations. SRC relies on its internal control as well as the personal honesty and integrity of all its employees, contractors and directors to protect company assets against damage, theft and other unauthorized use.

Our Responsibilities

- *We must not knowingly circumvent or knowingly fail to implement a system of internal controls or knowingly falsify any book, record or account; and*
- *We must make a report as per Section 3.4, if we detect a potential or actual fraud.*

6. CONFLICTS OF INTEREST

We are expected to safeguard SRC's interests and avoid any actual or apparent conflict between our personal interests and the interests of the Company. All business decisions should be made based on impartial and sound business reasoning.

A conflict of interests arises when involvement of a director or employee in external business or personal activities/relationships has or may have a harmful effect on the Company, whether unintentional or deliberate. An outside activity would be considered a conflict of interest if it:

- Has a negative impact on our business interest.
- Negatively affects SRC's reputation or relationship with others.
- Interferes with an individual's judgement in carrying out his or her job duties.

We should avoid all conflict of interest situations in our business decisions and in conducting business.

Situations to avoid include:

- Receiving and giving of gifts and/ or gratuities, or entertainment of more than nominal value or cash in any amount to or from people or companies doing or seeking to do business with SRC;
- Using company information for personal or other improper gain; and
- Using company assets or resources for personal or other improper gain.

Our Responsibilities

- *We must not give or receive from business partners any bribes, kickbacks or personal payments;*
- *We and our close relatives must not accept and/or give any gifts and/ or gratuities from or to vendors or external parties having business dealings with SRC; except small value souvenirs such as diaries, calendars and paperweights carrying the company logo of the gifting company. For purpose of The Code, 'close relative' includes an individual related to us by blood, marriage or adoption;*
- *We must use Company's assets only for the advancement of SRC's business;*
- *We must declare to our supervisors when:*
 - *We have or our close relative has an interest in an external company that has or is seeking to have business dealings with SRC;*
 - *Our close relative is employed by a competitor, or is self-employed in a similar technical or professional discipline in which advantage may be gained from having access to highly sensitive and proprietary information of competitive value;*
 - *We have a close relative or a person affiliated to us by virtue of close liaison is working in SRC;*
 - *We receive assignments or fees for consultancy, directorships, part-time or freelance activities in a personal capacity which may impact the Company; and*
- *We must report immediately as per Section 3.4 any situation which appears likely to result in an apparent or actual conflict of interest.*

For additional guidance

SRC ISO Documents:

- [E&IR 1.11 Safeguarding of Company's Interests](#)

7. MANAGING EXTERNAL INTERACTIONS AND RISKS

We are expected to conduct Company's business and interact with third parties such as our business partners and government officials in a manner that is free from any conflict of interest and corrupt practices. Employees with duties that involve interactions with government-owned or controlled entities or with government officials must familiarize themselves with anti-bribery laws.

Our business activities must meet the highest ethical standards and comply with relevant local and international laws and regulations.

7.1 Transparent Procurement and Counterparty Due Diligence

Our procurement activities will be conducted in a fair and transparent manner, bearing in mind commercial, confidentiality, legal and other applicable requirements.

Suppliers are to be given equitable opportunities and information access to compete on a level playing field.

Suppliers are to be pre-qualified against a set of established evaluation disciplines including financial and legal compliance to ensure their capability to deliver fully against their contract.

In addition to the above, the final selection of supplier will be based on their technical and commercial competencies including prices and other terms and conditions.

Our Responsibilities

- *We must not discriminate in favor of or against any supplier.*
- *We must pre-qualify suppliers based on the established Suppliers Pre-qualification process.*
- *We must treat suppliers fairly and ensure all suppliers are given equitable information access for preparing their bids including subsequent clarification provided to any supplier during the tender process.*
- *We must not deliberately withhold any relevant information or provide any misleading information to any supplier.*
- *We must conduct proper technical and commercial evaluation as part of the procurement process.*
- *We will seek appropriate management and legal guidance when in doubt and be open about concerns.*

7.2 Anti-bribery and Anti-corruption

SRC strictly prohibits directors, staff and third parties acting on its behalf from offering, paying, receiving or accepting directly or indirectly any bribes to/ from any employees, business partners, government officials or any individual in connection with the business or activities of the Company, under any circumstances including potential loss of business opportunities. A bribe for this purpose includes any money, goods, services, or things of value offered or given with the intent to gain improper advantage for the Company.

How we conduct ourselves affects our reputation and business operations. We must therefore respect and comply with applicable anti-bribery and corruption laws.

7.3 Political Involvement and Contributions

Corporate involvement in and contributions to political parties or candidates for political office are strictly prohibited. However, SRC does not restrict employees' involvement in or contribution to political activities, provided such involvement or contribution is undertaken strictly in the employees' capacity as private citizens and conducted outside of paid work hours.

Our Responsibilities

- *We must not make offers, payments, promises to pay or authorizations of payment of anything and of value to an official of any government (including ministry, department or agency) or public international organization; and*
- *We must seek legal guidance in case of doubt and report immediately as per Section 3.4 any acts of actual or suspected bribery or corruption.*

Our Responsibilities

- *We must not participate in any political campaigns or activities in the name of SRC;*
- *We must not engage in corporate contributions or lobbying nor present gifts, either directly or indirectly, to any political candidate or party;*
- *We must not engage in personal political activities during paid work hours or using Company's resources;*
- *We must declare and seek prior approval if we are standing for political office; and*
- *We must report immediately as per Section 3.4 any acts of actual or suspected violation.*

7.4 Anti-competition

Singapore and many other countries have anti-competition laws to protect the free market system and ensure competition among companies is fair. We must understand and comply with the applicable laws and regulations. Failure to comply can lead to fines and imprisonment.

Our Responsibilities

- *We must not engage in any illegal agreement with our competitors, whether written or verbal, to fix prices, margins, discounts, rebates or other terms (including setting minimum or maximum prices, formulas or credit terms), allocate customers, territories or markets, or fix market share or share future production plans, limit production or rig bids, either directly or indirectly;*
- *We shall not abuse our market dominance, if any, and shall not do any of the following: unduly restricting competition, raising entry barriers, undertaking predatory pricing and unduly refusing to supply a customer;*
- *We shall not take part in any mergers or acquisitions that are anti-competitive;*
- *We must not exchange any undisclosed market information with our competitors in an attempt to restrain trade and competition illegally; and*
- *We must seek legal guidance in case of doubt and report immediately as per Section 3.4 any non-compliance.*

7.5 International Trade and Anti-boycott Laws

There are local and international trade as well as anti-boycott laws and regulations governing our import, export, trade, handling of goods as well as licensing of technology and software. Failure to comply with the applicable laws and regulations can lead to delay, goods seizure and prosecution.

Our Responsibilities

- *We must not export nor re-export strategic commodities, technical data or technologies that are subject to the restrictions under the relevant export control regulations of Singapore (e.g. Strategic Goods (Control) Act), the United States and other countries where applicable;*
- *We must not make any transaction in which the destination, end-use, or end-user is subject to trade sanctions maintained by Singapore, the United States or other countries where applicable;*
- *We must not deal with any parties or goods sanctioned by Singapore, the United States or other countries where applicable;*

- *We must not participate or cooperate with international boycotts not supported by Singapore, the United States or other countries where applicable;*
- *We must seek legal guidance in case of doubt and report immediately as per Section 3.4 any non-compliance.*

8. HEALTH SAFETY ENVIRONMENT & QUALITY POLICY

Our Health, Safety, Environment & Quality (“HSEQ”) goals are simply stated:

“No accidents, no harm to people, no damage to the environment and total customer satisfaction”.

The chief purpose of our HSEQ goals is to secure the safety and health of employees, contractors and the public. To this end, SRC strives to ensure the safety of its plants and assets, as well as minimize the environmental impact and footprint of its refinery operations. SRC has invested significant resources and effort in waste reduction, energy conservation as well as pollution and emission control. The refinery’s efforts are also channeled towards improving the quality of its products and services to meet its customers’ requirements.

SRC places a high priority on Process Safety Management and we are committed to attaining a high standard of Major Accident Hazard Control and Mechanical Integrity & Reliability performance to prevent process safety accidents.

SRC also has an Incident and Injury Free (IIF) program to promote the importance of genuine care and concern as well as the building of relationships between people to deliver a sustainable IIF workplace culture.

Our Responsibilities

- *We must comply with or exceed local legal requirements in our business activities;*
- *We must comply with HSEQ policies in executing our work practices; we must exercise the authority empowered in each one of us to stop work that compromises safety and potentially causes harm to people and environment;*
- *We will use Learning Teams to eliminate injuries and incidents at our workplace, with the aim to ‘make it easier to get it right and harder to get it wrong’;*
- *We must make a report of any unsafe behaviors or incidents immediately to our supervisors and/or HSEQ Representatives; and*
- *We must report immediately as per Section 3.4 any acts of actual or suspected violation.*

For additional guidance

SRC ISO Documents:

- [MPP 5.04-E HSEQ Policy](#)

9. DATA PRIVACY

SRC recognizes the importance to our business of respecting the protection of personal data.

9.1 Personal Data

Personal data means data, whether true or not, about an individual who can be identified:

- a) from that data; or
- b) from that data and other information to which the organization has or is likely to have access.

Personal data includes the following:

- Full name
- NRIC Number or Foreign Identification Number (FIN)
- Passport number
- Photograph or video image
- Telephone number
- Personal email address
- Residential address

9.2 Handling Personal Data

Personal data in Singapore is protected under the Personal Data Protection Act. SRC has a Personal Data Protection Policy that sets out the obligations with respect to protecting employees' personal data. A Personal Data Protection Guidance has also been established to provide supplemental information that enables employees to better understand and comply with the Personal Data Protection Policy.

Our Responsibilities

- *We must familiarize ourselves with SRC's Personal Data Protection Policy. We may refer to the Personal Data Protection Guidance if we require further information;*
- *We must only collect, use, disclose, retain and process personal data for specific, defined and legitimate purposes.*
We must ensure that we protect personal data in our possession and remove/delete it when we no longer have a business need to maintain the information;
- *We can contact SRC Data Protection Officers on any questions and/or concerns about the interpretation or operation of SRC's Personal Data Protection Policy at*
Email: SRCDPOs@src.com.sg; and
- *We must report immediately as per Section 3.4 any acts of actual or suspected violation.*

For additional guidance

SRC ISO Documents:

- [MPP 5.15 Personal Data Protection Policy](#)

SRC Data Privacy Shared Folder:

- [Personal Data Protection Guidance Notes](#)

10. MANAGING INFORMATION AND INTELLECTUAL PROPERTY

SRC's information assets are vital resources. They include both paper and electronic records as well as the systems and data storage media that store, process or transmit Company information.

SRC's intellectual property, which includes SRC's trade secrets, trademark and copyrighted material, is also a key SRC information asset.

10.1 Proper Access and Use

SRC policies safeguard our information assets against theft, unauthorized disclosure, misuse, trespass as well as careless and improper handling.

Improper handling extends to unauthorized viewing as well as copying, distributing, damaging, altering and removing information from the Company premises which includes downloading company information onto an external storage device, personal email and/or non-Company cloud storage without written authorization. Improper handling of information may constitute grounds for disciplinary action.

Our Responsibilities

- *We must read, understand and comply with IT Security Policies pertaining to system access control and security;*
- *We must use SRC's information and system responsibly and for authorized purposes only;*
- *We must protect the information entrusted to us from loss, modification and disclosure to unauthorized personnel; and*
- *We must report immediately as per Section 3.4 any acts of actual or suspected violation.*

10.2 Handling Sensitive or Proprietary Information

Information categorized as 'Classified' or 'Confidential-Restricted Access' should only be shared with others within the Company on a legitimate 'need to know' basis. Outside parties should have access to such information only if they are under binding confidentiality agreements and have a legitimate 'need to know'. Similarly, when handling sensitive information entrusted to us, we must take utmost care to protect the Company from potential liability and enable it to uphold a sustainable relationship with its business associates based on trust.

We need to protect SRC's intellectual property as well as respect and avoid infringing the intellectual property of others. Not doing so risks damaging our business and reputation with potential impact on our ability or license to operate.

Our Responsibilities

- *We must obtain and document the necessary authorization/approval for sharing of information categorized as 'Classified' or 'Confidential-Restricted Access'.*
- *We must protect sensitive company information from unauthorized access or disclosure within and outside the Company;*
- *We must comply with all applicable laws and regulations regarding intellectual property (including those regarding copyrights and trade secrets) and contractual commitments regarding the valid and enforceable intellectual property rights and other proprietary information of third parties;*
- *We must not knowingly infringe or misuse the valid and enforceable intellectual property of others;*
- *We must comply with all applicable licensing agreements and copyrights on the use of all software in the Company;*
- *We must adhere to IT software compliance requirements and must not copy or download software from the internet for use within the Company unless permission has been granted by SRC-IS Section as a substantial amount of information that is accessible on internet is subject to copyright or other intellectual property right protection; and*
- *We must report immediately as per Section 3.4 if we are aware of or suspect any violations/infringements.*

10.3 Retaining or Discarding Company Records

Archiving, retention and formal destruction of records is an important business-related activity to ensure conformance with compliance, audit and legal requirements.

A company record may serve one of many purposes which include but are not limited to the following:

- Proof of compliance to local statutory, legal, tax and other regulatory requirements (as in the case of financial books and records, operating licenses and permits, environmental and safety related records, for example).
- Support for operational requirements (as in the case of inspection reports or job completion forms, for example).
- Documenting the Company's holding (as in the case of a land lease or a deed, for example).
- Protecting the Company's interests, in the event of legal actions (as in the case of records pertaining to an incident for which legal advice is sought).

Our Responsibilities

- *We must abide by SRC's retention policy as well as prevailing legal and compliance requirements (which includes data privacy, security and financial standards requirements) on keeping records and other forms of information, retaining them for the period specified in the Company's policy/government regulations; and*
- *We must dispose of all relevant company records that are past their retention period in a responsible manner; for example, electronic data storage mediums must be sanitized/purged to ensure removal of company information before disposal and is to be incinerated thereafter.*

10.4 Retrieving Information for Litigation Purposes

During the course of a litigation, we may be instructed by SRC's legal counsel to provide documents or other evidence.

Our Responsibilities

- *We must ensure that any information provided to legal counsel must be true, accurate, consistent and factually sound; and*
- *We must consult legal counsel if we have any questions and report per Section 3.4 if we suspect any non-compliance.*

10.5 Using Computer Systems or Other Technical Resources

We are responsible for taking good care of the Company's IT-related assets and technical resources, ensuring that appropriate measures are undertaken to prevent unauthorized access. We must comply with applicable security and application system controls and standards which include refraining from sharing our personal user IDs, proper custody and control over the USB tokens and using the Company's information processing assets as authorized and only for approved business purposes. Failure to comply with the Company's IT Security Policy may subject violators to disciplinary action.

Our Responsibilities

- *We must not relocate, modify or install software without due authorization as this may pose a safety hazard, lead to damage to and/or loss of Company assets, void existing software/hardware warranties or violate software copyright laws;*
- *All laptop users are responsible for safekeeping their laptops and must take all precautions to protect their laptop from risk of theft, loss of confidential information or damage due to mishandling;*
- *We must not connect equipment from external sources to the Company computer or network system, except for the purpose of charging the battery of our mobile device; and*
- *We must maintain/housekeep data stored in the Company computers and respective shared folders in the network system.*

10.6 Using Email and the Internet

SRC's email system serves as an official means of communication amongst internal and external parties, with its usage intended for work-related purposes. Similarly, the Company's internet service is also intended to be used for work-related purposes. Occasional use of both the Company's email and internet services for non-business purpose is permissible, as long as it abides by the provisions of SRC's IT Security Policy.

Email messages and the email system are Company's property. Usage of both the Company's email and internet services may be monitored by the Company and are also subject to applicable laws and regulations. Inappropriate and unacceptable usage of the Company's email and internet services which amount to violation of Company policies governing the use of IT facilities may subject violators to disciplinary action.

Our Responsibilities

- *We must avoid using company email services for the following activities:*
 - *Transmission of unsolicited commercial or advertising materials, chain letters or junk mail of any kind;*
 - *Unauthorized transmission of confidential/proprietary/sensitive information (such as plant shutdown/turnaround schedule) concerning the Company's activities to a third party;*
 - *Transmission of information that infringes the intellectual property or proprietary information rights of another company or person; and*
 - *Creation or transmission of material that undermines the Company's respect for the dignity and right of individuals as well as its commitment to meritocracy regardless of social and cultural differences.*

- *We must not auto-forward SRC emails and/or mailbox content to any external email address; and*
- *We must not access websites on the Company's internet that contain or distribute content which is objectionable in the workplace. Such content includes but is not limited to pornography, sexually explicit images, text and other materials, and promotion of illegal activities or intolerance towards others.*

10.7 Using Social Media

Social media sites are highly visible communication channels that many people use both personally and professionally. Effective and appropriate use can provide a competitive advantage in the form of information gathering. However, employees should be cautious about their non-work-related social media and online activity and to restrict such usage during office hours.

Our Responsibilities

- *We must understand the implications of social media use on the reputation of the Company and to protect company sensitive information;*
- *We must be cautious and restrict non-work-related social media use and online activity during office hours;*
- *We must comply with Personal Data Protection Act at all times. This includes not posting photographs of other employees, customers, vendors, suppliers or company products without prior permission; and*
- *When in doubt you should seek advice from your respective section or department managers.*