



ETHICS ORGANIGRAM



Appointment of Ethics Officer

The Ethics Officer was appointed by the Board of Directors in July 2023 and is the reporting person within the Group for all ethical issues. He reports to the Corporate Governance, Sustainability and Nomination Committee, which in turn reports to the Board.

The responsibilities of the Ethics Officer include:

- Helping to promote an ethical culture within the organisation by strengthening and raising awareness of staff and clients about the ethics and accountability practices of the SICOM Group.
- Supporting staff members in performing their functions consistent with the highest standards of integrity as envisaged in the Code of Ethics for Employees and Business Conduct.
- Providing confidential advice and guidance on ethics to individual employees and Business Units.
- Acting as the reporting person within the organisation for all ethical issues.
- Ensuring that appropriate resources, training, and other materials on ethics are available to staff.

Ethical Framework

The SICOM Group has established a Code of Ethics for Directors and a Code of Ethics and Business Conduct for Employees, both of which are in line with the National Code of Corporate Governance. The Code of Ethics for Directors was reviewed in April 2024, while the Code of Ethics and Business Conduct for Employees was approved by the Board of Directors in June 2023. Both Codes are published on the Group's website.

The appointment of new directors is on the basis of objective criteria (such as their individual skills, knowledge, experience, independence and with due regard for the benefits of diversity on the Board, including gender) and their ability to act in the best interest of the Company as further mentioned in the Board Charter available on the Group's Website. Upon appointment, new Directors receive an induction pack, which includes the Code of Ethics for Directors. Accordingly, the safeguards against overboarding are mentioned in the Code of Ethics for Directors which can be viewed on our website (Under Codes & Policies in Corporate Governance section) :

"Directors must ensure that they devote sufficient time to enable them to diligently carry out their responsibilities and their duties to the Company. Directors must be judicious in the number of directorships they accept so that they can do full justice to their responsibilities as Board Members."

To ensure that Directors devote enough time and attention to the affairs of the Group, an executed declaration regarding their time commitments to effectively fulfill their duties as directors is mandatory upon appointment.



New employees are required to formally acknowledge that they have read, understood, and agreed to abide by the Code of Ethics and Business Conduct for Employees.

In addition to the Codes, the Group has implemented several policies that are part of its ethical framework, including the Whistleblowing Policy, Equal Opportunity Policy, Complaints Handling Policy, Anti-Harassment and Non-Discriminatory Policy, and Conflicts of Interest and Related Party Policy.

Reporting of Ethical and other issues

Ethical issues can be reported directly to the Ethics Officer, while other issues should be reported to the appropriate authority in accordance with the relevant policies or as stated in the Employee Handbook.

Conflicts of interest

The Board is responsible for overseeing conflicts of interest and transactions involving related parties. Employees can seek the guidance of the Ethics Officer or Senior Management if there are any questions or doubts relating to any proposed transaction or situation.

Details on related party transactions are disclosed in SICOM Group's Integrated Report (page 280-281).

Training and Surveys

Ethics training and surveys will be conducted on a yearly basis, with 2024 calendar being as follows:

Calendar for 2024

Ethics training for Directors	by 31 May 2024
Ethics training for Employees	by 30 June 2024

Ethics Survey for Directors	by 30 April 2024
Ethics Survey for Employees	by 15 June 2024