

The background of the image shows a modern office meeting room. Two women are walking in the foreground, smiling and talking. One is holding a coffee cup and a folder. In the background, several men are seated around a long wooden conference table, working on laptops. A whiteboard is visible on the wall behind them.

NCS
**code of
conduct**

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A photograph of three people in a modern office setting. A man in a dark polo shirt and glasses is pointing at a laptop on a round table. Two women, one in a white sleeveless top and one in a black sleeveless top, are looking at the laptop and talking. The background is a blue wall.

our purpose

We **advance our communities** by partnering with governments and enterprises to harness technology. We do this by bringing people together to **make the extraordinary happen.**

OUR beliefs

Our beliefs guide our actions and decisions on a daily basis. Just like the vowels in the English language, everything we do in NCS are anchored around our 5 beliefs - AEIOU.



We are curious and aspire to co-create the future



We pursue and celebrate making extraordinary happen



Through respect and trust we build win-win outcomes



We deliver on our commitments to our clients and our people



We build team NCS by bringing the strengths of diverse individuals together



our commitment to always act with integrity

NCS Pte Ltd and all of its subsidiaries and the subsidiaries of each of them (collectively referred to as "NCS") strive to be responsible as an organisation and as individuals in society, acting with integrity towards our Personnel, clients and business partners, as well as the wider community in which we operate.

This NCS Code of Conduct ("Code") sets the standard for acting with integrity at NCS. It governs all our decisions and the actions of all Personnel engaged by NCS, throughout the countries we operate in. It applies to all NCS Personnel – directors, executive officers, employees, as well as independent contractors or temporary staff.

It reflects our culture, who we are and how we behave. All of us in NCS are required to understand and abide by our Code and all applicable policies, hold each other accountable and speak up when aware that others are not acting in line with our Code. These ethical standards governing the way NCS conducts our business, also applies to our suppliers, business partners, consultants and business agents acting on NCS' behalf.

Our Code reflects basic guiding principles and formulates minimum standards of behavior. It is a shared responsibility to act in accordance with the spirit and principles of our Code at all times and in all situations because it is the right thing to do. There are no exceptions.

The NCS Code of Conduct is endorsed by and has the full support of NCS' Board of Directors and Senior Leadership Team, who are jointly responsible for overseeing compliance.



how to make good decisions and ethical choices

Our reputation for acting ethically and responsibly is built one decision at a time, every day, by each NCS Personnel. Our Code, together with our company policies, gives NCS the information needed to perform our job ethically. It is each NCS Personnel's responsibility to understand and comply with our Code and the policies that apply to the work we do and the decisions we make. Through leadership at all levels, we aim to sustain a culture in which ethical conduct is recognised, valued and exemplified by all Personnel.

Each Personnel plays a critical role in ensuring that NCS is a great work environment and in protecting our culture, our reputation and our brand. NCS supports each Personnel in doing the right thing and conducting business with integrity. If any Personnel is unsure of what to do in a situation, they have resources available to them, including their leaders and the Compliance Team.

NCS applies our Code, Beliefs and culture, which provides the framework for making a decision when facing difficult or unclear circumstances or ethical dilemmas, to make good decisions. The starting point is a positive culture of integrity.

Making the Right Decision

A

Identify the Ethical Problem

- List possible solutions and any obstacles to resolving the problem.

B

List the Possible Actions you could take and the Implications

If in doubt about a course of action, ask the following questions:

- Is it legal?
- Is it consistent with our Code?
- Is it ethical?
- Will it reflect well on NCS and yourself?
- Would you want this published in the media?
- Would you be comfortable with the example it sets for future decisions?

If the answer to any of these questions is 'no', do not take this course of action.

C

What should you do?

- Be accountable in your decision-making and understand the commitment to conduct business in a responsible way takes priority over any short-term gain.
- If the path is not clear or there is still uncertainty, ask for guidance from your Manager or your Senior Leadership Team.

D

Follow through on your Ethical Decision

how to raise concerns

If you suspect a violation of our Code, you are urged to report your concerns. Doing so will allow NCS to address and resolve the issue, ideally before it becomes a violation of law or a serious risk. Our Code demonstrates that NCS takes our legal and ethical responsibilities seriously.

NCS offers multiple ways for our Personnel or third parties to report ethics and compliance concerns, including anonymously and confidentially, through an external hotline provider.

Reports of concerns or issues, will be treated seriously, fairly, and promptly. Personnel who submit reports will not suffer adverse consequences for:

Refusing to do something that violates our Code, NCS' policies, or the law, even if the refusal results in the loss of business to NCS.

Raising a concern in good faith about potential misconduct.

Cooperating with an investigation.

NCS does not tolerate retaliation against or the victimisation of any Personnel or third party who raises concerns or questions regarding a potential violation of our Code or any NCS policy that he or she reasonably believes to have occurred. Anyone who retaliates against a Personnel for engaging in any of these activities will be subject to disciplinary action, up to and including termination.

Failure to comply with our Code can have serious consequences for NCS as well as the individual(s) involved. It is viewed by NCS as a serious matter that lead to disciplinary action, up to and including termination of employment or dismissal, as well as criminal penalties such as fines and imprisonment for the individual(s) involved.

Such disciplinary action may also be taken against supervisors who condone, permit or do not report improper conduct.

We maintain an investigation team to review and investigate reported compliance concerns. If the investigation uncovers violations of policy or law, NCS takes appropriate remedial action, which may include disciplinary actions, enhanced controls, and removal of partners or vendors.

The investigations team reports on data and trends, and we train our Personnel using lessons learned from our investigations.

Report your concerns on suspected violations of our Code to our Whistleblower Hotline as set out as set out in the Reporting Options Section of our Code.



**Integrity
with**

governments

Comply with Laws

As a regional business, NCS is committed to complying with the laws of the countries where we operate.

This includes all applicable laws, regulations, and legal, regulatory and licensing requirements, including directions and orders of any government or statutory or regulatory authority. Where there is a difference between a legal requirement and our Code, we apply the stricter standard.

We are also committed to complying with all applicable trade laws and regulations, including economic sanctions and export controls, and we maintain adequate controls and measures to ensure compliance.

We do not condone our Personnel engaging in any violent behaviour, moral wrongdoing or criminal act under any applicable laws, regulations and legal requirements, regardless of whether the Personnel is criminally charged or convicted.



Foster Appropriate Working Arrangements with **Government Entities**

When selling to the Public Sector, whether in relation to pre-bid activities or while fulfilling contract requirements, we adhere strictly to applicable public sector procurement laws, regulations and procedures.

We accept sole source contracts only if the client has made an exception to competitive procurement rules and NCS has not improperly influenced that exception.

Prior approval of the Compliance Team is required before using any agents or consultants on public sector procurement deals.

We comply with anti-corruption and anti-bribery laws. We do not offer or make payment(s) or provide gift(s) of any kind in order to facilitate a process or in order to influence or induce a government official to do business with NCS.



Prevent Corruption, Bribery and Fraud

NCS adopts a zero-tolerance policy towards any form of corruption or bribery in our business with domestic and foreign governments, as well as with private entities, whether directly or through a third party.

The same approach also applies to fraud and any other form of criminal conduct. We ensure strict compliance with our Anti-Bribery and Anti-Corruption Policy and all relevant anti-bribery and corruption laws including the Singapore Prevention of Corruption Act, the UK Bribery Act, the US Foreign Corrupt Practices Act and the Australian Criminal Code Act.

We do not give or receive – either directly or indirectly – anything of value (including any payment, benefit, gift or hospitality) in order to obtain or retain business, influence business decisions, or secure an improper advantage in the conduct of our business.

When we offer and accept gifts and hospitality, we ensure they are reasonable, appropriate and have a legitimate business purpose, and that the processes, required approvals and controls in our Anti-Bribery and Anti-Corruption Policy are adhered to.

If we make charitable donations, we do so to support a legitimate charitable cause, not as part of an exchange of favours. We hire the best candidate for the job, and do not make hiring decisions to benefit a client or official.

We do not engage in the practice of facilitation payments to speed up or secure the performance of a routine government action.

A violation of our Anti-Bribery and Anti-Corruption Policy will lead to disciplinary action for the individuals involved. This may include dismissal and reporting the offence to the police or relevant regulatory agency.



These provisions apply to our interactions with governments, our communities, our clients and our partners and suppliers

Keep Accurate Business Records

We are committed to ensuring the accuracy and completeness of all data, records, reports and expenditure connected with NCS.

Company records are kept in compliance with any legal or regulatory requirements. We do not falsify, omit, misstate, alter or conceal any information, or otherwise misrepresent the facts on a company record or encourage or allow anyone else to do so.

In keeping financial records, we do not engage in any practice or procedure which might conceal, facilitate or constitute bribery, kickbacks, improper gratuities or other illegal or improper payments or receipts, or which might appear as such.

We record and report financial transactions and business information accurately, completely and honestly following applicable laws, regulations and accounting practices.

We do not engage in money laundering and will take appropriate measures to prevent money laundering by reporting suspicious transactions, such as payments between unknown entities through an excessive number of intermediaries, high-value cash transactions, or payments made or received by suspicious entities or involving high-risk countries.



Maintain Appropriate Standards in Political Engagement

NCS is an apolitical organisation. We do not make any contribution, in money or in kind, to political parties or organisations, or to individuals engaged in politics.

We respect the decision of our Personnel on their individual political affiliations. Involvement in political activities should be at the Personnel's time and cost. They should not involve the company in any form or manner in their political associations, including the use of any company resources. This could include official work hours and company properties such as stationery, work tools, office space and vehicles.





2

**Integrity
with
communities**

Promote Sustainability and Environmental Responsibility

We are committed to sustainability and will do all that is reasonable and practicable to minimise any adverse effects of our activities on the environment.

This could be through product design and development, efficient use of resources, or participation in environmental initiatives or volunteer activities.

We will comply with applicable environmental regulations and permits, and will report any violation or suspected violation, or any action intended to cause or conceal a violation to appropriate channels within NCS.



Protect Confidential Information and Intellectual Property

All confidential information acquired by NCS in the course of our engagement with any government department, statutory board or commercial entity will be kept in confidence.

It will not be published, communicated, or transmitted to any unauthorised person in any form at any time, without the official sanction of the relevant approvers of the respective organisations.

We are committed to protecting information provided in confidence by any third party, such as a client, supplier or a business partner. Confidential Information about clients, suppliers and business partners will remain confidential and is imparted only if we have received full authority to do so.

We hold inside information in strict confidence until such time as it is released into the public domain by authorised management. NCS Personnel with access to inside information must refrain from executing transactions in NCS related companies securities directly or indirectly and are prohibited from advising or encouraging other persons to do so.

NCS' intellectual property is a valuable asset and we protect it at all times. We safeguard our patents, trademarks, copyrights, trade secrets and other forms of intellectual property against unauthorised use or improper disclosure. We do not infringe any third parties' intellectual property rights including, but not limited to, any third-party copyrights, patents and trademarks. We guard against cyberthreats to prevent IT or data security issues or incidents.



These provisions apply to our interactions with governments, our communities, our clients and our partners and suppliers

Communicate Effectively

We promote and protect the NCS brand. All marketing activities are conducted based on the fundamental principles of fairness, honesty and integrity.

We will, at all times, communicate in a professional manner with our clients, suppliers and business partners in all forms of communication including face to face meetings, email, phone calls and chat messages.

We post and comment responsibly on social media. We are respectful to our audience. We remain professional in our conduct, and do not use offensive, defamatory or demeaning language.

We do not comment on or discuss confidential information or communicate on behalf of NCS without prior authorisation.



Make a Positive Impact to the Community

Our Personnel are encouraged to give back to the community by participating in NCS' outreach efforts, NCS sponsored volunteer opportunities and other ways that are meaningful to them.

It is important that participation in charitable activities or public service, as a board or committee member of an organisation, does not create a conflict of interest with NCS. For example, when engaging in personal charitable activities, prior approval has to be secured before committing any company funds or assets.



A large, bold white number '3' is positioned on the left side of the image. The background is a blurred city street scene. In the center-right, a small, bright green, boxy robot car is visible. The car has a black front panel with the word 'HELLO!' written in blue. The car is on a paved surface, and there are blurred figures of people and trees in the background.

3

Integrity
with our **clients**

Honour Data Privacy

We respect the privacy and protect the personally identifiable data of our clients, Personnel, business partners and other individuals.

We process the personal data of individuals to the extent necessary for legitimate business purpose.

Any processing of personal data shall be relevant to such business purpose and it shall be fair, accurate, transparent and in no way excessive. We use, store, transmit and destroy personal information only in accordance with the law, our policies and applicable contractual provisions.

We do not disclose personal information to anyone who does not have a legitimate need to know such information, within or outside of NCS.

A Local Laws and Regulations on Personal Data Protection

NCS is committed to complying with the personal data and privacy laws and regulations of the countries where we operate. Our Personnel must adhere to all internal procedures and processes developed as well as agreed contractual provisions.

B Extraterritorial Laws and Regulations on Personal Data Protection

When we obtain personal data of individuals from certain jurisdictions in the course of work, the collection, processing and disclosure of such data requires compliance with applicable extraterritorial laws, and all internal procedures and processes developed as well as agreed contractual provisions.

We use industry standard controls to ensure cyber security at work. We have put in place legally compliant safeguards to protect confidential and proprietary information and data including personal data. We cooperate with the relevant authorities in protecting personal data.



These provisions apply to our interactions with governments, our communities, our clients and our partners and suppliers

Never Engage in Bribery or Corruption

In addition to complying to Section 1.3 of our Code, we prohibit the making of payments or payments in kind such as gifts or favours to influence individuals to award business opportunities to NCS or to make a business decision in NCS' favour.

All contracts with clients and business partners must be fairly arrived at, with no hidden deals or unspoken agreements, and fully documented in writing.



These provisions apply to our interactions with governments, our communities, our clients and our partners and suppliers

Compete Fairly

We are committed to competing vigorously and fairly in a free market in order to give clients the widest possible choice of products and services at competitive prices.

We avoid contact with competitors, unless there is a clear justification for such contact, and such contact is in compliance with antitrust laws. We avoid any formal or informal agreements with competitors that limit competition. We respect competitive bidding processes, and do not rig or fix the outcomes or help anyone else do so.

Prohibited conduct may include: colluding with others to fix prices or divide territories, illegally monopolising an industry or unlawfully abusing a dominant position.

When gathering competitive intelligence, we use appropriate sources, are truthful, and do not misrepresent who we are. We must always seek any third party's confidential information through the proper authorities and obey the rules of having such information, if any.

We obtain information about our competitors in a fair manner. We do not make use of confidential information disclosed to us by a third party if we suspect that in so doing the discloser is violating an obligation of antitrust law or confidentiality.



These provisions apply to our interactions with governments, our communities, our clients and our partners and suppliers

Provide Delivery Excellence with a focus on Innovation, Value and Outcomes

We seek to maintain ongoing communication with our clients and are committed to listening to and working with them, so that we can design and deliver the solutions they need with speed, quality and integrity.

We maintain good relationships with our clients and are committed to delivering the highest standard of service.





4

Integrity
with partners
and suppliers

Use Trustworthy Partners and Suppliers

We award business to partners who are committed to acting fairly and with integrity, and to observing applicable laws.

We follow a process to select and award business to business partners and suppliers who are committed to, and demonstrate responsible business conduct. This applies whether we are purchasing for our internal use or in support of client engagements.

We understand our partners', subcontractors and vendors' qualifications and reputation before we engage them. We select the best partners, subcontractors

and vendors for the job, by carefully considering their proven track record, reputation for integrity, and other merits - not based on preferential dealings.

NCS does not buy or sell on a reciprocity basis. We base our purchasing decisions on quality, price and supplier reliability. We do not exert or attempt to exert influence to obtain special treatment for a particular supplier. We never ask or suggest that they do things that are not allowed under the law or our policies.

We ensure appropriate contractual arrangements are entered into with our partners, subcontractors and vendors. We expect our partners and suppliers to uphold the principles in our Code and our Suppliers' Code of Conduct.



Treat Gifts, Hospitality and Travel Responsibly

In addition to Section 1.3 and Section 3.2 of our Code, any payments to a business partner or supplier must be justified by clear and demonstrable services rendered by that business partner to NCS.

We do not solicit gifts, hospitality or travel from third parties, or put them in a position where they feel obligated to provide something in order to do business with us. We do not ask our partners or suppliers to give gifts, hospitality, or travel on our behalf.

These provisions apply to our interactions with governments, our communities, our clients and our partners and suppliers

Avoid Conflicts of Interest

NCS Personnel must avoid all potential conflicts of interest between work and personal affairs when a personal interest or activity interferes or appears to interfere with their NCS duties.

Conflict of Interest occurs when Personnel are placed, either voluntarily or otherwise, in a position where it would affect their objectivity in exercising discretion in favour of or against a client, supplier, or a Personnel of NCS, or when professional or personal interest makes it difficult for Personnel to fulfil their duties properly or creates an impression of impropriety.

Some examples of situations where a conflict of interest could arise include the following:

A Personal Conflict of Interest

Personnel must not participate in or influence decisions by NCS or any of its related companies to hire any relative or any person with whom they have a close personal relationship (hereafter referred to as a “related individual”). If a related individual works for NCS or any of its related companies, either should not exercise influence over the other, supervise or report to the other, or provide input on the other’s performance, career or other business matter.

If the related individual is a vendor, supplier or business partner of NCS or any of its related companies, or works for a competitor, supplier, vendor or business partner, the Personnel should not directly or indirectly be involved in the selection,

assessment, negotiations or any transactions with these entities on behalf of NCS. Any situation where such conflict of interest exists or could arise has to be declared to NCS.

B Financial or Business Conflict of Interest

Personnel must not have any direct or indirect financial or business interest, including personal investments, in businesses linked to a client, supplier/vendor, competitor, or any entity the Personnel engages with in a business relationship on behalf of NCS. This may create a conflict of interest and/or impair the judgments they make on behalf of NCS.

Any situation where such conflict of interest exists or could arise has to be declared to NCS.

C Outside Employment/Business

Our Personnel cannot engage in any outside employment/business without the prior written consent from NCS, unless such employment/business has been arranged or is undertaken in connection with their responsibilities and duties as part of NCS. All outside employment/business must be declared and approved in writing. If approval has been granted, they must ensure that these do not negatively affect their ability to fully and effectively perform their role in NCS.

continued on the next page →

Avoid Conflicts of Interest

D Directorship

If Personnel are offered a directorship in any organisation whether within or outside NCS' related companies (other than NCS), and such directorship is not connected to their responsibilities and duties in NCS, they must obtain written approval for the directorship and ensure that it does not negatively affect their ability to fully and effectively perform the duties of their employment.

Any remuneration and/or benefits-in-kind offered to the Personnel in respect of their directorship in any organisation is subject to the following:

- (i) Remuneration and/or benefits-in-kind received for directorship in NCS-related companies (other than NCS) or in any Singapore Government Statutory Board must be declared and surrendered to NCS.
- (ii) NCS has the right to restrict the acceptance and/or receipt of any remuneration and/or benefits-in-kind received for directorship in any other organisation not covered in (i).

E Financial Embarrassment

NCS Personnel have to ensure that they do not subject themselves to any financial embarrassment (or allow themselves to be put into such a position). This includes indebtedness which results, or may result, in legal or bankruptcy proceedings.

Personal finances have to be managed in a responsible and prudent manner, and Personnel should not indulge in speculative transactions, financial commitments, or high-risk financial activities, such as addictive gambling or share trading which could give rise to indebtedness to the level that does not commensurate with their ability to pay.

While there are no explicit guidelines to prohibit Personnel from legal gambling (which includes wagering of money in casino, on cruise ship, at race course, online gambling, buying lottery ticket, and wagering on slot machine), Personnel must act sensibly and conduct themselves, whether at work or outside of work, in a manner that upholds the integrity, reputation and values of NCS.

Where the Personnel is in financial difficulties or subject to financial embarrassment including the threat of bankruptcy, the situation has to be declared to NCS.



5

Integrity
with our **people**

Contribute to a Safe and Productive Workplace

A Safe and Productive Workplace

NCS is committed to providing a healthy, safe and productive work environment for Personnel. Each Personnel has responsibility for maintaining a safe and healthy workplace by following safety and health rules and practices and reporting accidents, injuries and unsafe conditions, procedures, or behaviours.

To achieve our commitment, we will

- Understand and comply with all applicable health and safety laws, regulations, guidelines and procedures;
- Provide a conducive work environment that supports well-being, healthy living, collaboration and work-life harmony;
- Promote a culture in which all Personnel share our commitment in achieving the adopted standard for Workplace Safety and Health practices and the rules of office security in all our operations;
- Conduct specific risk assessment prior to carrying out team building activities, where applicable;
- Educate our Personnel by providing information, instruction, training and supervision;
- Identify and assess work-related hazards and risks;
- Implement corrective and preventive measures;
- Report and investigate work-related accidents;
- Seek guidance and benchmark so as to continuously improve processes to prevent work-related incidents, injuries and illnesses;
- Implement programs to help Personnel better manage work-related stress and promote mental health;
- Establish responsibilities, accountabilities and performance measurement including monitoring to ensure achievement of key targets and continual performance improvement;
- Provide resources to achieve the industry standards of health, safety and environmental practices

B Workplace Harassment

NCS is committed to providing Personnel with a work environment which is conducive, safe and free from discrimination and harassment. Personnel should treat their colleagues and others they interact with - whether in person or online - with respect and professional courtesy at all times.

We do not tolerate workplace harassment or any conduct that causes alarm or distress to another party or permits an offensive, humiliating or intimidating work environment. This includes behaviour that takes place online through different modes of communications such as email, text messaging or social media and not just physically in the workplace.

Examples of behaviour that may be considered harassment include threatening, abusive, or insulting language, comments or non-verbal gestures, discrimination, physical violence, cyber-bullying, doxxing, sexual harassment and stalking.

Harassment within and outside the workplace is an offence under local laws and regulations of the countries where we operate, and a range of civil and criminal remedies is available for victims of harassment.

NCS will investigate all complaints and incidents in a fair and timely manner. There shall be no form of retaliation or intimidation against any person for making good faith reports concerning allegations of discrimination, harassment or any other allegations of improper behaviour. Any Personnel, who is found guilty of such acts shall be subject to disciplinary action, which may include termination/dismissal from service.

continued on the next page →

Contribute to a Safe and Productive Workplace

C Alcohol and Drugs

NCS Personnel must attend work in a fit state and not under the influence of alcohol or illegal drugs. Drugs and/or alcohol can impair an individual's capacity to perform their job safely, efficiently and with respect for colleagues and clients. Consumption and involvement with the manufacture, possession, use, distribution, sale, purchase or transfer of illegal drugs is strictly prohibited.

When attending company-approved client/vendor social events where alcohol may be served, consumption should always be in moderation to avoid intoxication. NCS Personnel driving company vehicles are prohibited from being under the influence of alcohol or illegal drugs. Personnel must behave professionally, and never in a manner that would bring disrepute or embarrass NCS.

D Work Performance

NCS holds its Personnel to a very high standard of performance. We aim for growth, take on new challenges, show initiative, make positive contributions and demonstrate teamwork. We make decisions that support sustainable and long-term business growth. We strive to do innovative work and are flexible in making improvements.

E Maintaining a Professional Appearance at Work

All Personnel must present a well-groomed and professional appearance and dress appropriately at work, for company events, at client's sites and for client meetings.



Promote Meritocracy, Non-Discrimination and Diversity

We strive to promote meritocracy and do not discriminate on the basis of race, color, age, gender, gender identity, or expression, sexual orientation, language, religion, political or other opinions, disability, national or social origin or birth.

We believe in a diverse workforce and an environment that is inclusive of all people and their unique abilities, strengths, differences, skills, experiences and perspectives.

To ensure that we provide a safe and respectful workplace with equal opportunities for all our Personnel, NCS embraces the following key principles of equal opportunity employment practices:

- Recruit and select Personnel on the basis of merit (such as skills, experience or ability to perform the job), and regardless of age, race, nationality, gender, sexual orientation, religion, family status or disability. We provide equal employment opportunities to all qualified candidates and Personnel.
- Treat Personnel fairly and with respect and implement progressive human resource management systems, including in matters that involve recruiting, hiring, training, promoting, compensation, or any other term or condition of employment.
- Provide Personnel with equal opportunity to be considered for training and development based on their strengths and needs, to help them achieve their full potential.

- Reward Personnel fairly based on their ability, performance, contribution and experience.
- Abide by local labour laws.

We respect diversity in each other, our clients and suppliers and all others with whom we interact. We strive to adopt a global mindset and respect the different cultural and work practices of the countries we operate in.



Protect People, Assets and Our Business

NCS' assets, including NCS premises and facilities and physical assets and systems, are to be used only for NCS' legitimate business purposes.

Personnel are responsible for company property, from NCS or its related companies, entrusted to their care.

We use assets belonging to others, including clients, only to the extent permitted by the other party. Personnel have to make sure they fully understand and follow the relevant terms and agreements as well as any laws that may restrict access to the assets based on privacy or other requirements.

Use of IT Systems

NCS' IT systems constitute a critical component of our business operations and are provided for authorised business purposes only in accordance with our IT policies and processes. Personnel are required to act responsibly when updating their personal data or uploading any information (statements, documents, videos, photos, etc) in any IT systems provided by NCS and its related companies. They must not knowingly update false information nor upload any materials that are defamatory, offensive, obscene and inappropriate or that violate or infringe any laws, copyright, trademark or any other intellectual property, personal or proprietary rights of any person, including any obligation of confidence. Personnel must also ensure that all third parties they engage or work with adhere to NCS' security requirements when accessing any NCS information, systems or other information services.

To protect against phishing attacks, Personnel should be vigilant and cautious when dealing with suspicious emails to protect the organisation's sensitive information and intellectual property.

Phishing emails are becoming more convincing, and Personnel must stay alert and not click on suspicious links or respond to them. If Personnel suspects a phishing email, they should report it. NCS provides phishing awareness training and simulation testing to educate Personnel on how to detect and avoid phishing attacks.





upholding these standards

Our Responsibilities

We are expected to uphold our Code, NCS policies, and the law.

THIS MEANS WE MUST :

Read, understand, and comply with our Code, and the policies, laws, and regulations that apply to our job.

Speak up when we see possible violations of our Code, NCS policies, and legal and regulatory requirements.

Be truthful, and cooperate fully in any internal investigations. Do not conceal or destroy information.

Complete training of our Code, and attest that we understand and commit to comply with our Code.

Failing to read or attest to the standards in our Code does not excuse us from these responsibilities.

Oversight

NCS' Code and its Ethics and Compliance Program are endorsed by and have the full support of NCS' Board of Directors and Senior Leadership Team. The NCS Board of Directors and Senior Leadership are responsible for overseeing compliance with this Code.

Applicability

This Code applies to all NCS Personnel, which means its Board of Directors, executive officers and all employees as well as independent contractors and temporary staff. When we refer to "NCS subsidiaries" we mean all entities in which NCS directly or indirectly owns more than 50% of the voting controls.

Enforcement and Waivers

This Code is important to us. In order to ensure that business integrity is an issue that is alive throughout NCS, a company-wide communication and training program, including mandatory sign-off on our Code, has been put in place to heighten

awareness of the need for compliance with our Code. Compliance with our Code is monitored via a network of market, country and sector Compliance Representatives, who regularly report to the Compliance Team, which advises NCS' Senior Leadership on the deployment of our Code and on ethical issues in general. Reporting on compliance with our Code also forms an integral part of the Statement on Business Controls issued annually by the management of each business unit or department as part of a cascading process leading to CEO certification of NCS' compliance with our Code. Compliance processes and procedures are audited by NCS Internal Audit. Waivers of this Code of Conduct may be made only in a manner permitted by law and approved in writing by the Head of the Compliance Team and NCS Senior Leadership.

Supplements and Amendments

This Code is reviewed on a regular basis and revised where necessary. This Code can be supplemented by additional specific requirements and/or policies, as amended from time to time. On the NCS Intranet Site, NCS Personnel will have access to underlying policies, references and further guidance.

reporting options

Report your concerns on suspected violations of our Code to our Whistleblower Hotline as set out below:

(Internal contact)

Email: g-audit@ncs.co

(Independent external contact - Deloitte)

Tel: +8000 9447853

Online: <http://deloittewhistleblowerhotline.tipoffs.asia>



