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## 13.1 Introduction

### **Why we have this Code**

The long-term success and prosperity of SAESL depends on each of us conducting our business in line with the highest ethical standards and applicable laws.

The SAESL Code of Business Ethics (the Code) sets out our commitment to these principles. It is also designed to help you resolve any ethical issues or dilemmas you may encounter in the course of your work.

### **In this Code you will find:**

- the principles that underpin the way in which we conduct our business;
- ethical dilemma scenarios to help illustrate them; and
- guidance for all SAESL employees.

### **Responsibilities**

We are all expected to take personal responsibility for ensuring that our behaviour is consistent with this Code.

You must read and understand the principles and guidelines set out in this Code, together with the laws and SAESL policies and standards, that apply to your job and ensure that you comply with them at all times.

### **For Heads and above, you also have a responsibility to:**

- lead by example and display high ethical values and integrity at all times;
- create an environment in which members of your team feel confident and able to raise ethical issues; and
- ensure that any ethical concerns that are raised are taken seriously and followed up appropriately.

It is not possible for this Code to be exhaustive and set out every legal or company requirement. Therefore, you should seek advice wherever you are unclear on a matter and exercise sensible personal judgement in line with this Code's general principles.

### **Compliance with this Code**

Violation of this Code is not acceptable and may result in disciplinary action, up to and including dismissal, being taken.

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## **13.1.1 Working together**

This section outlines the commitment of SAESL to:

- promote a diverse and inclusive work place in which every individual feels respected, valued and able to reach their full potential;
- engage with its employees; and
- protect the privacy and confidentiality of its people.

### **13.1.1.1 Diversity, discrimination and harassment**

#### **Principles**

- We treat each other openly, honestly and courteously
- We do not tolerate bullying or harassment of any kind under any circumstances
- We encourage employees to speak up about any instances of bullying or harassment which they experience or observe
- We promote diversity and equality and provide equal opportunities for all employees in a workplace free from unlawful discrimination.
- We appreciate employees' commitments outside of the workplace and support our employees in achieving a balance between work and home life

#### **We will:**

- treat everyone we meet in the course of our business with consideration and respect (for example, job applicants, employees, customers, visitors and suppliers);
- speak up if we witness, or are aware of, any behaviour which we believe constitutes bullying or harassment; and
- support SAESL to investigate and eliminate such behaviours.

#### **We will not:**

- behave in a manner that is bullying, intimidating, offensive or malicious;
- make jokes which are discriminatory or inappropriate; and
- engage in sexual harassment including unwelcome physical contact, expressions, gestures, comments or invitations

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**Additionally, Heads and above are also expected to:**

- ensure all employees know the standards of behaviour expected of them;
- intervene to stop unlawful discrimination (including harassment) and give appropriate support to those affected;
- not victimise or retaliate against an employee for making a complaint; and
- follow applicable investigatory processes when dealing with complaints raised against any member of their team.

Harassment can take many forms, including physical, verbal and non-verbal conduct that is unwanted by individuals, violates their dignity or creates an intimidating, humiliating or offensive environment.

## **13.1.1.2 Performance and opportunity**

### **Principles**

- Our remuneration policy seeks to reward our employees fairly and takes account of individual contributions to the performance of the businesses.
- We apply performance targets in a fair and consistent manner.
- We regularly review the performance of our people and provide constructive feedback.
- We invest in training, education and development to improve the skills of our employees and the capability of the business.

### **We will:**

- perform our jobs to the best of our abilities.

### **Additionally, Heads and above are also expected to:**

- provide regular and constructive feedback on the performance of their teams; and
- support and promote the development of their staff.

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## 13.1.1.3 Engagement and representation

### Principles

- We seek to engage and involve employees in improving the business and encourage regular employee feedback.
- We aim to foster effective dialogue with employees on business and work issues.
- We operate procedures to ensure that disputes are resolved fairly.

### Additionally, Heads and above are also expected to:

- provide regular updates to their teams on the performance of the company and their department; and
- give consideration to the effect on employees of any decision or action they may take.

## 13.1.1.4 Privacy

### Principles

- SAESL respects the personal privacy of its employees in accordance with applicable laws.
- We only collect and process personal information in accordance with applicable laws in order to meet necessary business needs and legal requirements.
- We all have a personal responsibility to keep personal information secure and observe individual privacy.

### We will:

- only create, save, hold and transfer personal information in accordance with applicable personal information/data protection legislation; and
- speak up if we have any concerns about how personal information is secured or processed in the area of the business in which we work.

### We will not:

- disclose personal information to anyone inside or outside the organisation without valid business reason, appropriate authorisation or unless legally required; or
- seek to access personal information for which we do not have authorisation or an appropriate lawful reason.

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**Additionally, Heads and above are also expected to:**

- set an example by managing personal information according to the applicable laws;
- limit access to personal information to those that have lawful reason to access it; and

While the company respects employees' privacy, the use of the internet and intranet, email and other company communications systems is not private to the employee. The company may periodically review messages for security and other business purposes in accordance with applicable laws and regulations.

## **13.1.2 Confidentiality**

**Confidential Information:** Information, in any form, that is not in the public domain and is intended to be protected from disclosure (whether it is proprietary in nature or whether by contract, legal protections such as trade secret laws, or other means). Information may be confidential irrespective of whether it is specifically labelled "confidential", "proprietary" or otherwise, or whether it is oral, written, drawn or stored electronically. Alternatively, labelling information "confidential" or "proprietary" or other classification does not automatically make the information Confidential Information.

### **Principles**

- We will keep Confidential Information confidential and not use information which we should not have.
- Safeguarding SAESL's Confidential Information is our responsibility and vital to our success. Inappropriate use or disclosure of Confidential Information can cause serious harm to SAESL and others.
- We will also safeguard the Confidential Information we hold including data from customers, suppliers, and other partners and will only use such Confidential Information in the way we are authorised and to the extent we are permitted to and not share it externally unless approved to do so.

### **We will:**

- Keep all Confidential Information secure and protect it from unauthorised or accidental disclosure in line with business procedures and any appropriate laws.
- Use the Confidential Information only in the way we are authorised to.
- Seek guidance from my supervisor or Legal when we are unsure if we are permitted to receive or use any Confidential Information.

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**We will not:**

- Try to find or accept Confidential Information about other organisations or people without their permission.
- Try to get access to classified information if it is not required for legitimate business purposes or if we are not authorised to have it.

**Additionally, Heads and above are also expected to:**

- Assess when a Non-Disclosure Agreement is to be entered into with third parties before any information is disclosed to them and to consult Legal when in doubt.

## **13.1.3 Conducting our business**

This section outlines the commitment of SAESL to:

- undertaking its business activities without recourse to anti-competitive activity, bribery or corruption;
- fully complying with the applicable laws
- strengthening relationships with our customers and suppliers

### **13.1.3.1 Competition**

#### **Principles**

- We are committed to fair competition and honest, straightforward business dealings.
- We abide by antitrust and competition laws.
- We do not obtain competitor information by disreputable means.

**We will:**

- exercise caution when talking with representatives of our competitors to avoid even the appearance of anti-competitive practice; and

**We will not:**

- share the details of specific customer and supplier contracts or negotiations with our competitors, other customers or suppliers; or
- discuss prices, ongoing bids, terms and conditions of sales, market share, costs or profit margins with our competitors.

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## 13.1.3.2 Anti-bribery and corruption

### Principles

- We are committed to conducting our activities in a wholly ethical manner, free from any form of bribery or corruption. We are committed to maintaining a high level of awareness among our employees, our suppliers and others with whom we do business of the latest rules and regulations relating to anti-bribery and corruption.
- We comply with the applicable legislation on bribery and corruption wherever we operate and we cooperate appropriately with officials of the relevant government agencies if required to do so.
- We only appoint agents who can demonstrate that they fully comply with the principles of this Code and avoid bribery and corruption, to represent our interests. Appointment of advisers must be approved by the CEO, and is subject to the Advisers Policy.
- We will exercise due caution when making charitable donations to ensure that they are appropriate and proportionate.

Bribery can be defined as 'the receiving or offering of an undue reward to a public official or private individual in order to influence them in the exercise of their duty'. Indirect bribery is when a payment is made via an adviser.

### We will:

- require any advisers to comply with a code of ethics that is at least comparable to ours and to applicable laws;
- conduct appropriate due diligence on third parties (e.g. customers, suppliers and partners) we engage and transact with and only select third parties that meet our high ethical requirements;
- include standard anti-bribery and corruption clauses in third party agreements, contracts and renewals where deemed necessary and appropriate;
- only make payments to advisers that are proportionate, proper and legitimately due in relation to the services provided;
- ensure that internal controls are in place to prevent bribery and corruption

### We will not:

- offer, promise or accept, directly or indirectly, anything of value that could be construed as a bribe; and
- pursue business that requires us or SAESL to engage in unethical or illegal activity.



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**Additionally, Heads and above are also expected to:**

- set a personal example in promoting honesty and integrity in their business conduct.

### **13.1.3.3 Gifts and hospitality**

#### **Principles**

- We avoid hospitality that is lavish, when it might be reasonably regarded as a personal reward for the recipient, and cannot be reciprocated.
- We only accept modest personal gifts and then only on occasions when it is customary to exchange items of low value.
- We do not seek to influence government officials, departments or customers through the provision of gifts, hospitality or other inappropriate means.
- We are committed to understanding and adhering to the gifts and hospitality rules and the relevant legislation in the countries in which we operate.

#### **Recording gifts and hospitality**

- Registers to record gifts and hospitality (whether accepted or declined) are in place and should be maintained. Gifts and hospitality should be recorded in a manner that permits traceability.

#### **We will:**

- consider, before giving or receiving a gift or hospitality, whether it is legal, appropriate and proportional; and
- ensure we fully understand and comply with the requirements relating to gifts and hospitality when dealing with government officials.

#### **We will not:**

- offer or receive a gift of money
- accept a gift or hospitality if it is illegal or cannot be transacted transparently;
- accept a gift or hospitality if we believe it is being offered as an attempt to influence our decisions or create an expectation of inappropriate favourable treatment; and
- offer or receive entertainment that is inappropriate or offensive.

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**Additionally, Heads and above are also expected to:**

- ensure internal controls are in place governing the giving and receiving of gifts and hospitality in their areas; and
- ensure that all staff receive an appropriate level of training on gifts and hospitality.

#### **13.1.3.4 Export control**

##### **Principles**

- We comply with applicable import and export laws and regulations and obtain proper authorizations for the import and export of goods, technology and information. Please refer to the [Policy on Strategic Export Controls, Sanctions and Embargoes](#).

**We will:**

- fully comply with applicable export laws when transferring goods, technology or information across national borders with reference to Export Control OPMs.

**We will not:**

- make guesses about the meaning of export laws which are highly complex. If in doubt, we will contact Legal.

#### **13.1.3.5 Dealing fairly with our customers**

##### **Principles**

- We use our expertise to benefit our customers, bringing them new market opportunities, good value and high quality products that are reliable and safe.
- We communicate honestly and openly with our customers, seeking to fully understand their requirements and to meet our commitments to them.
- We provide a high standard of after-sales service to build and maintain customer satisfaction.
- We respect any customer information to which they provide access and use it accordingly.

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**We will:**

- seek to understand the requirements of our customers and satisfy these requirements by submitting realistic proposals on performance, cost and schedule;
- ensure that in bid preparations and contract negotiations, all statements and communications are current, accurate and truthful;
- follow SAESL quality and safety management procedures to ensure the integrity of our products;
- complete product inspection and documentation accurately and truthfully.

**We will not:**

- release non-public information about a customer; nor
- inappropriately deal with safety or quality concerns

**Additionally, Heads and above are also expected to:**

- ensure that SAESL procedures are in place and observed, in order to assure the quality and safety of our products and services.

## **13.1.3.6 Dealing fairly with our suppliers**

**Principles**

- We treat all our suppliers with fairness and integrity and build mutually beneficial relationships, regardless of the value of our transaction or the length of our association.
- We expect our suppliers, their employees and their supply chains to operate to the highest standards of quality and integrity, in their relationship with us.
- We respect any supplier information which they provide to us and use it appropriately.
- We do not tolerate any form of forced or child labour, and promote the observance of human rights.

**We will:**

- draw our suppliers' attention to the principles of this Code;
- communicate honestly and openly with our suppliers;

- contract our terms of business with suppliers clearly and operate in accordance with them;
- work with our suppliers to find mutually beneficial solutions to problems that arise;
- work with our suppliers to ensure that they comply with applicable anti-bribery and corruption laws; and
- comply with supplier selection criteria to ensure that suppliers are chosen on merit.

**Additionally, Heads and above are also expected to:**

- monitor how suppliers adhere to the principles defined in this Code and take appropriate action if behaviours are contrary to these principles.

## **13.1.4 Running our company**

This section outlines the commitment of SAESL to:

- complying with the highest standards of corporate governance;
- achieving the highest standards of accuracy and integrity in our business records;
- avoiding conflicts of interests in our business dealings;
- using our assets – human, financial, physical and intellectual
- making our business grow; and
- protecting our brand and reputation.

### **13.1.4.1 Corporate governance**

#### **Principles**

- We comply with the laws and regulations that apply to our business activities.
- The SAESL Board of Directors and Management Team are committed to the highest standards of corporate governance.
- We are committed to understanding and meeting our obligations to all our stakeholders.
- We aim to keep our shareholders informed.

**We will:**

- take due care when committing to spend company money; and
- act within the expenditure limits described in the various SAESL policies and procedures

**We will not:**

- commit SAESL to contractual obligations that are beyond the scope of the authorised expenditure limits

## **13.1.4.2 Accuracy and integrity in business records**

**Principles**

- We maintain accurate and complete records of all business, including all transactions between SAESL and external individuals and organisations.
- We act in accordance with the applicable technical and professional standards.
- We prepare our financial records in a timely manner, representing the facts accurately and completely.
- We are committed to the prevention and detection of fraud and will report any suspicion of fraudulent activity. Fraudulent activity is a criminal offence which SAESL will not condone under any circumstances.
- The company does not evade tax and tax planning complies with the intention and letter of the law.

“Without limitation, a Fraudulent Activity may involve deceit, act(s) of deception, trickery, dishonest practice, or breach of confidence and may be intentionally perpetrated for profit or to gain some unfair or dishonest advantage or to achieve a detriment to another. This includes but is not limited to falsification of information, intentional omission, false pretenses, and deliberate misuse of qualified resources or certification/qualification/authorisation.”

**We will:**

- be straightforward and honest in relation to financial matters;
- preserve documents and records in accordance with applicable legal requirements; and

- show personal and financial integrity in submitting or approving expense claims.

**We will not:**

- allow bias, conflict of interest or undue influence to override our judgments;
- try to influence others to do anything that would compromise the integrity of SAESL's records, reports, products or services;
- sell, transfer or otherwise dispose of company assets without appropriate prior authorisation and all necessary documentation; or
- deliberately make a false or misleading entry in a report, record or expense claim or falsify any other form of financial or non-financial corporate record (for example safety, environmental or quality results).

**Additionally, Heads and above are also expected to:**

- ensure that proper controls and processes are in place to achieve accurate and complete financial and management reports; and
- maintain internal controls to prevent the making of any improper payments under global anti-bribery laws and statutes.

### **13.1.4.3 Avoiding conflicts of interest**

**Principles**

- We avoid any relationship, influence or activity that will impair, or even appear to impair, our ability to make fair and objective decisions when performing our jobs.
- If we believe there is, or may be, a conflict of interest, we will report it promptly to the responsible section head, department manager, department general manager or department vice president and seek advice.
- Employees shall not at any time during his/her employment, except with the expressed and special permission of the Company, engage directly or indirectly in any other business or occupation whatsoever either as principal, agent, servant, broker or otherwise engage in any activity to the detriment, whether direct or indirect, of the Company's interests.
- If an employee wishes to engage in any such activity, he/she is required to submit his/her request for approval in writing to the Human Resources Department, providing details of the activity as well as his/her interest and level of involvement.

- Approval shall be granted on the condition that priority is given to his/her official duties in the Company. The approval can be revoked at any time.
- If the employee's member of family or close friend has a financial or other interest in a company that does business with SAESL, then there is a conflict of interest.
- Any potential conflict of interest must be reported to the immediate superior of the staff using the [Disclosure of Potential Conflict of Interest Registration Form](#).
- All employees are required to submit the Disclosure of Potential Conflict of Interest Registration Form upon joining the Company.
- The following groups of staff are required to submit the Disclosure of Potential Conflict of Interest Registration Form on an annual basis.
  - Heads and above
  - Customer Business
  - Procurement
  - Finance
  - Human Resources
  - Logistics
  - Supply Planning
  - PMO & Strategy
  - Other staff who have made a disclosure of potential conflict of interest in the previous year
- Should there be any changes to the previous submission of the Disclosure of Potential Conflict of Interest Registration Form, the employee is required to fill in the form again to declare changes.

**We will:**

- discuss relationships that could give rise to a conflict of interest with our superior.

**We will not:**

- personally provide any services to a competitor or potential competitor;
- knowingly place business with a firm owned or controlled by an employee of SAESL or their family, without prior written approval;
- own, or have a substantial interest in, a company which is or has the potential to be a customer, supplier or competitor of SAESL unless prior written approval has been granted;

- use non-public information for personal gain, or pass such information to someone else (either inside or outside the company) who does not have a legitimate need for the information.

**Additionally, Heads and above are also expected to:**

- not place themselves in the position of hiring or supervising relatives;
- ensure that potential or real conflicts of interest are discussed, approved and recorded;
- assess any conflict of interest that are reported to you, or you become aware of, and determine if an actual or potential conflict of interest exists;
- determine the best course of action to resolve, manage, or terminate the actual or potential conflict of interest if it exists;
- review and approve the Disclosure of Potential Conflict of Interest Registration Form.

A conflict of interest occurs when an individual has an interest that compromises his or her ability to behave objectively. If you, a member of your family or a close friend have a financial or other interest in a company that does business with SAESL, then you may have a conflict of interest.

## **Recording conflicts of interest**

A register to record all declared conflicts of interest has to be maintained and reviewed at the Ethics Committee meeting. The review consists of assessment of the risk involved and coaching on identifying the appropriate precautionary measures if any declaration has not been addressed sufficiently.

### **13.1.4.4 Safeguarding our assets**

#### **Principles**

- Technology, information and designs are the lifeblood of SAESL and the sole property of the company. We keep such information in the strictest confidence.
- We take individual responsibility for the proper use of SAESL and customer property, including IT systems, materials, facilities and equipment.
- We do not tolerate the use of SAESL information systems to access, copy, store or transmit any information or data considered to be offensive, obscene or inappropriate.
- We value the company's time, and work diligently to fulfil the responsibilities of our role.



**We will:**

- use and maintain SAESL assets with the utmost care and respect, guarding against waste and abuse;
- use SAESL assets only for company purposes unless we have proper authorisation for other use; and
- keep documents (including those provided to us in confidence by other parties) protected and secure.

**We will not:**

- disclose SAESL confidential information to third parties without previously entering into an appropriately authorised confidentiality agreement; or
- seek personal gain from the use or sale of SAESL assets.

## **13.1.4.5 Sustaining our reputation**

**Principles**

- We recognise that our reputation is a key asset and behave at all times, including when undertaking activities outside the workplace, in a manner that maintains and reflects well on our brand.
- We deal straightforwardly with the media and ensure that nothing is said that is intentionally inaccurate or misleading.

**We will:**

- act in a way that protects or enhances our reputation and brand at all times; and
- use care and good judgement when speaking about SAESL or individual employees during our leisure time.

**We will not:**

- speak to the media about SAESL without prior specific authorisation to do so.

## **13.1.5 Health, safety and environment**

This section outlines the commitment of SAESL to:

- achieving excellence in our health, safety and environmental (HS&E) performance; and
- improving the efficiency and reducing the environmental impact of our products and our operations.

## **13.1.5.1 Healthy and safe working**

### **Principles**

- The company believes that all HS&E incidents are avoidable and we aim to protect people's health, have zero injuries and environmental incidents, and avoid or minimize any environmental impact of our activities.
- We make proper provision for the health, safety and wellbeing of our employees, visitors, contractors and others who may be affected by our activities at work.
- We recognise that the abuse of (or being under the influence of) alcohol, drugs, solvents, over-the-counter medication and other substances can jeopardise the health and safety of our employees and the integrity of our products. We treat any such abuse at work or at company sponsored events as serious misconduct.
- We maintain a secure working environment and prohibit our employees from bringing any weapons or dangerous devices of any kind onto our property.

### **We will:**

- adhere to HS&E rules and procedures and have regard for environmental controls;
- always use the required safety equipment;
- report all HS&E incidents, including near misses and unsafe acts/conditions, to our superior, or HS&E representative immediately; and
- know what to do if an emergency occurs at our place of work.

### **We will not:**

- undertake work when our performance is impaired by alcohol or other drugs whether legal, illegal, prescribed or otherwise, nor allow others we see to do so;
- put ourselves or others at risk by our actions.

### **Additionally, Heads and above are also expected to:**

- set a personal example in promoting a healthy and safe working environment;

- make decisions that are consistent with the company HS&E policy; and
- challenge unsafe conditions and engage with those involved to agree the necessary improvement actions.

## **13.1.5.2 Our products and operations**

### **Principles**

- We are committed to improving the efficiency and environmental performance of our operations by investing in appropriate research and development.
- We aim to have zero injuries and environmental incidents.
- We aim to reduce the environmental impact of our operations, pursuing improvement targets in such areas as energy, waste reduction and recycling.
- The company will meet relevant legal, industry and other requirements and seeks to implement industry best practice.

### **We will:**

- familiarise ourselves and comply with the HS&E rules and regulations that are relevant to our role.

### **We will not:**

- deliberately waste resources.

## **13.1.6 Working within our communities**

This section outlines the commitment of SAESL to:

- building positive relationships with the communities in which we live and work; and
- contribute to the wellbeing and development of Singapore

### **13.1.6.1 Working within our communities**

#### **Principles**

- We respect the traditions and cultures of Singapore and we are sensitive to local customs.

- We seek to contribute to the economic wellbeing and social development of the areas in which we operate.
- We encourage our employees to support local communities, particularly in education, arts and culture, the environment and social and economic regeneration.
- Charitable donations are an integral part of our community involvement. We direct this support primarily to causes with educational, engineering and scientific objectives, as well as social objectives connected with our business and place in the wider community.
- SAESL does not participate in party politics or make political donations. We may, however, provide appropriate support to our employees if they wish to become involved in civic affairs in accordance with local laws.
- We represent views to governments and others on matters affecting our business interests.

## **We will:**

- familiarise ourselves with the local laws, rules and regulations that are pertinent to our job; and
- listen carefully to any community complaints and make every effort to address these concerns.

## **13.1.7 Applying this Code**

### **13.1.7.1 Asking questions and seeking help**

We are committed to creating and maintaining an environment in which employees may raise questions about ethics and business conduct without fear of reprisal or retaliation. Please, never hesitate to seek guidance on these matters. It is better to raise a question at an early stage than to let the situation deteriorate to a point where it requires a more formal response.

If you have a question on ethics and business conduct, or on the laws and regulations that apply to them at your place of work, a good first point of contact is your superior. If you feel unable to speak to them, for whatever reason, there are other sources of help available.

Alternatively, you may raise your concern via [SAESL EthicsPoint](#).

## **13.1.7.2 Reporting unethical behaviour**

If you believe you have experienced or witnessed unethical behaviour, you have a responsibility to do something about it. Start by discussing it with your superior. If you feel unable to speak to them or are unsure of where to go for help, you may raise your concern via [SAESL EthicsPoint](#).

### **What happens when I raise a concern?**

Details will be taken of your concern and a report will be made. You can ask for your concern to be dealt with anonymously. However, giving your name will help in following up the concern thoroughly. Your details will remain confidential and be known only to those specifically involved in investigating your concern.

Reported concerns will be ultimately reviewed by the CEO. We ensure that you will receive a prompt response and will initiate any appropriate investigations.

### **Retaliation and reprisals**

Claims of retaliation, reprisal or of someone being treated detrimentally as a result of raising an ethical concern in good faith will be taken seriously and investigated thoroughly. Anyone who engages in retaliation or reprisal can expect to be disciplined, which may include action up to and including dismissal.

## **13.1.7.3 Identifying ethical dilemmas**

In the course of your work for SAESL, you may be faced with situations where you are unsure of the right course of action. This section will help you to identify instances where there may be an ethical dimension.

### **Identifying ethical issues:**

A good way of identifying whether there is an ethical dimension to our actions or the actions of those around us is to ask some of the following questions:

- Are these actions: legal, fair and honest?
- How will I feel about myself afterwards?
- How would this issue look if it were reported in the newspapers?
- How would I feel if my family and friends knew about my actions?

Another way is to listen to the language around us. If we find ourselves hearing or saying phrases like the ones below, we may well be entering an ethically complex situation:

“Well, maybe just this once.”

"No one will ever know."

"It doesn't matter how it gets done as long as it gets done."

"It sounds too good to be true."

"Everyone does it."

"Don't worry its part of the culture."

"Shred that document."

"We can hide it."

"We didn't have this conversation."

"I don't want to know."

## **13.1.7.4 Resolving ethical dilemmas**

If you are faced with an ethical dilemma your first point of reference should be this Code. If it does not provide an answer, the following approach can help you decide how to proceed.

### **Step 1 - Gather basic information**

#### **a) How did this problem arise?**

- Outline how you became aware of the situation.
- Outline the history behind the situation
- Find out what caused the situation to arise

#### **b) Who's involved?**

- Check if they are SAESL employees and/or third parties
- Find out how many people are aware of the issue and whether it is publicly known

#### **c) What more can you find out?**

- Background information and context
- Ask yourself if you need to talk to anyone else
- What is fact and what is rumour and hearsay

## **d) What do the rules/policies say?**

- Refer to this Code and the policies it contains.
- Refer to any policies and procedures.
- Consider what laws and jurisdictions impact on the issue.
- Seek advice from a functional expert

## **Step 2 - Decide who takes it forward**

### **a) Can you decide – or do you need to escalate?**

- Ask yourself if you feel comfortable making this decision.
- Ask yourself if the decision falls within your level of authority. Consult with your superior or the points of contact identified in the section Chapter 13.1.7.1

### **b) Review all the facts**

- Consider all the evidence that you are aware of
- Try to distinguish between fact and rumour or hearsay

### **c) Understand the urgency and the timescale**

- Find out how quickly you need to resolve the issue.
- Find out who else needs to be briefed about the issue.

## **13.1.7.5 Code applicability**

### **Who this Code applies to**

This Code applies to SAESL, including all of its employees. In addition, third parties such as suppliers, subcontractors and consultants should be encouraged to comply with this Code:

### **Customs and laws**

This Code establishes the minimum standard of conduct that is expected throughout SAESL in relation to our business. Where the guidance in this Code conflicts with any applicable laws or procedures, you should follow the higher standard, ensuring always that the laws are satisfied. If you are unsure on how to

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proceed, you should seek guidance from one of the sources outlined in Chapter 13.1.7.1, 'Asking questions and seeking help'.