



CORPORATE CODE OF BUSINESS ETHICS & CONDUCT

Version 9.0

TABLE OF CONTENTS

CEO's Message

Our Values

Overview

1. Conflicts of Interest

- 1.1. Anti-Bribery & Anti-Corruption
- 1.2. Dealing with Public Officials
- 1.3. Gifts & Entertainment
- 1.4. Outside Employment or Part-Time Services

2. Interacting with the Market

- 2.1 Antitrust Compliance
- 2.2 Interactions with Suppliers and Customers

3. Protecting Information

- 3.1 Confidential Information
- 3.2 Data Privacy

4. Protecting Assets

- 4.1 Information Technology Resources
- 4.2 Intellectual Property
- 4.3 Financial Assets and Transactions
- 4.4 Company Equipment / Vehicles

5. Accuracy in Recordkeeping

- 5.1 Financial Integrity

6. Human Rights

7. Communicating about Sunningdale Tech

- 7.1 Speaking on behalf of Sunningdale Tech
- 7.2 Audits and Investigations
- 7.2 Social Media

8. Environment, Health and Safety

- 8.1 Protecting the Environment
- 8.2 Preventing Injuries and Illnesses

Reporting Violations

Discipline

Communication

Monitoring & Review

CEO's Message

Sunningdale Tech is committed to upholding the highest degree of ethical behaviour, honesty and adherence to laws in everything we do. It is this common commitment to our values and code of ethics that binds our richly diverse employees towards a common goal and direction.

Our company values — Be experts, Be problem-solvers, Be progressive — form the foundation of our business interactions with customers, suppliers, competitors and other stakeholders. Our values drive a dynamic and innovative culture among employees and enable us to serve our customers and stakeholders with best-in-class solutions to address their biggest challenges.

All employees are personally accountable to uphold our company values while our Code of Conduct ensures we hold ourselves to the highest ethical and compliance standards. These standards protect the company, enhance our reputation, and promote sound corporate governance.

I expect all employees to use these standards as a practical guide for decision making on matters pertaining to ethical considerations. I urge you to join me in understanding and dedicating yourselves to upholding our values and to the standards set forth in our Code of Conduct.

Together we will create a legacy to build a reputation as a respectable employer, business partner and corporate citizen. Thank you for your dedication and commitment.

A handwritten signature in black ink, appearing to read 'Boo Hor', with a stylized flourish above the name.

Khoo Boo Hor
Chief Executive Officer

OUR COMPANY VALUES

- **Be experts**

With an extensive global footprint, financial stability, and years of experience, we channel our expertise to deliver reliable solutions in all things related to plastics.

- **Be problem-solvers**

As an engineering company, problem solving is our forte, and we're geared to solving challenging projects or exploring different ways to optimise our processes in order to better meet your needs.

- **Be progressive**

We continually look to create better solutions, and explore, evaluate & apply new ideas & possibilities that are relevant to you

OVERVIEW

This policy serves to promote, among other things, honest and ethical conduct and to ensure to the greatest possible extent that the Company's business is conducted in a consistently legal and ethical manner to maintain the public's confidence in the integrity of the Company and its staff.

This policy applies to all employees, individuals and third parties working for or on behalf of the Sunningdale Tech Group of Companies at all levels and grades, whether permanent or temporary or on a contract basis. Each of us has a responsibility to:-

- Familiarize with the policies and guidelines set forth in this Code of Conduct
- Know and comply with the laws and regulations in the countries where we operate
- When in doubt, ask questions before taking action. Disclose observations or information about conduct you believe might be illegal or unethical or that violate the Code
- Cooperate fully and honestly in any internal investigations of misconduct

In this policy, third party means any individual or organization that the employees come into contact with during the course of work, including actual or potential clients, suppliers, agents, distributors, business contacts, advisors and government and public bodies.

1. CONFLICTS OF INTEREST

The highest standards of integrity shall be upheld in all business interactions. All employees performing our duties are required to act in good faith towards the Company. Employees need to be aware of the potential for conflict of interest to arise and should always act in the best interest of the Company.

A conflict of interest is considered to arise when an employee acts on behalf of someone other than the Company, or in carrying out the employee's duty for the Company has a self-interest of which the Company is unaware, and from which the employee makes a profit or gain, or that is actually or potentially adverse to the best interest of the Company.

Conflict of interest with official duties may arise for various reasons. It is not possible to define all potential areas of conflict of interest and if any employee is in doubt as to whether a conflict exists or a questionable situation that might arise, the employee should immediately consult the Department Manager or higher level of management.

Employees, individuals and third parties have the right to refuse doing anything in non-conformance to this policy and shall not experience any retribution for such refusal.

1.1 Anti-Bribery & Anti-Corruption

- a) The Company have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion, and embezzlement in any form, whether dealing with customers, suppliers, government officials or representatives of non-governmental commercial organizations. Never offer, pay, promise to pay, or agree to accept or accept anything of value, either directly or indirectly, in exchange for obtaining or continuing business or an improper advantage.
- b) Bribes or other means of obtaining undue or improper advantage shall not be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving, or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

- c) A bribe may include (non-exhaustive) any gifts and offers of entertainment/hospitality, and facilitation payments and kickbacks to public officials.
- d) In addition to our own actions, we may be responsible for certain acts of third parties and are liable for any corrupt payments or other bribes they offer on our behalf. It is critical that we know who we are working with, the business practices they employ and the reputation they have for operating honestly and ethically.

1.2 Dealing with Public Officials

- a) When dealing with public officials, employees must adhere to the highest ethical standards of business conduct. Employees should not offer, provide or solicit any special treatment or favour in return for anything of economic value or the promise or expectation of future value or gain.
- b) The Company does not accept and will not make any form of facilitation payments of any natures. Facilitation payments are payments made to the public officials or other third parties to secure or expedite a routine function they are otherwise obligated to perform. Kickbacks accepted or made in exchange for a business favour or advantage is also not allowed.

1.3 Gifts & Entertainment

- a) **Gifts** are items and services of value that are given by any outside parties, either directly or indirectly. This includes lucky draw items, festive gifts, travel tickets and tickets to holiday resorts, etc but excluding items described below:
 - Items of minimal value given in connection with sales campaigns, promotions or employee services, safety and recognition awards;
 - Corporate gift of the minimum value of less than S\$20; and
 - Contributions or donations to recognised charitable and non-profitable organization.
- b) **Festive gifts** are gifts given by outside parties during the festive seasons such as Lunar Chinese New Year, Christmas, Mid-Autumn festivals, etc. Examples of gifts received during the festive period include (but not limited to) hampers and food items.
- c) Employees must not accept any gifts, favours or benefits that may influence or create an obligation, directly or indirectly, for an employee to act in a particular way (decision-making inclusive) or deviate from proper exercise of the employee's official duties.
- d) Employees are requested to decline and return, wherever possible any presents offered by the customers, suppliers, business associates or the public. However, if it is discourteous to return it, the employee should report the matter immediately and hand over the presents to the Department Manager.
- e) However, a gift, like a painting, presented to the Company are acceptable. The gift received should be disclosed and handed over to the Department Manager.
- f) Lucky draw items received at a function or event organised by the supplier, business associate or customer, such as a voucher, a household appliance or a car, etc., must be reported and handed over to the Department Manager or the CEO.

- g) Festive gifts received should be routed to the Collection Centre (i.e. HR Department). The gift items collated will then be distributed to all departments as far as possible.
- h) An employee may accept discounts on a personal purchase of the supplier's or customer's products only if such discounts do not affect the Company's purchase price and are generally offered to others having a similar business relationship with the supplier or customer.
- i) Entertainment and services offered by a supplier or customer may be accepted by an employee if they are associated with a business meeting and are essential for the cause of the business. Such an offer is also usually provided by the supplier or customer to others as a regular part of its business.

Examples of such entertainment and services are:

- business lunches and dinners;
- transportation to and from the supplier's or customer's place of business;
- golf outing; or
- tickets to an event, performance or occasion.

However, the employee must report the invitation or offer by the supplier or customer to the Department Manager.

1.4 Outside Employment or Part-Time Services

- a) Employees must not be employed outside the Company,
 - in any business that competes with or provides services to the Company or its subsidiaries;
 - in a manner which would affect your objectivity in carrying out your responsibilities;
 - where the outside employment would conflict with scheduled hours, including overtime, or the performance of the Company assignments. Employees must not use Company's time, materials, information or another asset in connection with outside employment.
- b) Employees are not allowed to operate private business or promote part-time services or collect payments on the Company's premises during and after working hours.

2. INTERACTING WITH THE MARKET

The Company believes in a thriving marketplace with free, fair and open competition. We promote fair and positive business relationships and do not take unfair advantage of others by misleading or deceiving them.

2.1 Antitrust Compliance

- a) The Company is committed to free and open competition and prohibiting anticompetitive agreements and behaviour, such as price-fixing and predatory efforts to eliminate competitors.

- b) Advertising or marketing initiatives undertaken by the Company or employees may not be deceptive, false or misleading. The Company is committed to upholding the highest standards of fair business, advertising, and competition products and capabilities.
- c) To avoid an appearance of collusion or an attempt to engage in unfair competition, employees must not participate in public or private, oral or written communications, discussions, or agreements with an actual or potential competitor about pricing, quotations, costs, projected profits or margins, markets shares, geographic territories served, suppliers, customers and other terms and conditions of sale.
- d) Participating in trade association events may result in antitrust or other competition violations as trade association members are often competitors and there is a tendency in sharing information on business activity. Therefore, when participating in trade association activities, employees must avoid the exchange of information or discussion of Company business activities and topics as listed in clause (c) above. Politely end the conversation or discussion with the members or competitors if any sensitive information is brought up for discussion.

2.2 Interactions with Suppliers and Customers

- a) No employee can, directly or indirectly, benefit from the employee's position or any sale, purchases or other activity of the Company.
- b) No employee who deals with individuals or organizations who are doing business with the Company, or who makes recommendations concerning such dealings, should have an interest in any competitor of the Company, or in any organization doing or seeking to do business with the Company.

An interest means economic interest that might influence judgement or action. In this respect, all employees must complete the "Declaration Form on Direct / Indirect Interest" to declare any potential conflict of interest to avoid any detrimental business decision by the Company as a result of a conflict of interest.

- c) Employees must not do business on behalf of the Company with a close personal friend or relative. However, recognising that these transactions may occur, the employees must declare such relationship by completing the "Declaration Form on Direct / Indirect Interest".
- d) No employee shall provide any service or equipment to suppliers or customers in a manner that would place the objectivity or integrity of the Company in question.
- e) If the Company is engaged in a tender process, no gift, no matter how small or insignificant, should be accepted from the tenders.
- f) Loan of money or objects from customers and suppliers is strictly prohibited because they place the borrower under obligation to the lender. This does not apply to loans from a recognised lending institution, such as banks and financial institutions.
- g) No member of an employee's immediate family shall solicit or accept any gifts, gratuities, kickbacks, entertainment or other favours and benefits, which would influence the employee's judgement, from an actual or prospective customer or supplier or from anyone who could cause them to favour that supplier over the others.

3. PROTECTING INFORMATION

Information is one of the Company's most valuable assets. Employees have an obligation to safeguard information that are considered sensitive, never use it for our personal benefit and never disclose it to others, including family members, friends, or anyone else who does not have a need to know. In this regard, sensitive information relates to confidential customer or company details, facts or figures that would pose a risk to the company if released to a competitor or the public.

3.1 Confidential Information

- a) Confidential information includes information relating to trade secrets, designs, processes, methods, advertising or promotional programmes, sales, data or statistics affecting financial results or others concerning the Company, which is not made available publicly. It also includes any private information relating to records of suppliers, customers and fellow employees.
- b) It is the responsibility of all employees to protect against the unauthorised disclosure of confidential information. We are not allowed to make public or communicate any confidential information to the press or divulge any confidential information to any individuals or organizations.
- c) The obligation not to divulge confidential company information is in effect even though materials might not be specifically identified as confidential and the obligation exists during and continues after employment with the Company.

3.2 Data Privacy

- a) We value the privacy of our employees, our customers and third parties with whom we do business and are committed to the responsible consent, notification, collection, storage, protection, processing/use, retention, transfer/transmission/sharing and disposal of their personal data. Personal data are processed in accordance with the applicable local laws.
- b) We take appropriate organizational and technical measures to protect personal data from unauthorized disclosure and take swift and deliberate action to remedy any breach of data.
- c) Employees with access to personal data are required to protect the information that is entrusted to them. Improper handling of personal data may result in fines for the Company and even criminal charges for individuals.

4. PROTECTING ASSETS

The protection of our information technology, financial and physical assets is a critical responsibility. Employees must respect these assets, use them to carry out official business and protect them from damage, loss, misuse and theft. We also have a responsibility to extend the same degree of care to assets entrusted to the Company by others.

4.1 Information Technology Resources

- a) The communications employees make using a Company computer, telephone, mobile device, cloud service, or other electronic resource and the information stored on them are Company property. In accordance with applicable law, the Company may make records of such communications and monitor activity on these

resources to ensure they are used to conduct company business legally and in accordance with policies and procedures.

- b) The Company has the right to monitor, in accordance with applicable laws, all of its assets, including its electronic information systems, and cloud services, and review information on them. While the Company respects the privacy of its employees, it monitors its assets to promote safety, prevent criminal activity, investigate alleged misconduct and security violations, manage information systems, and for other business reasons.

4.2 Intellectual Property (IP)

- a) IP includes, but is not limited to, patents, trademarks, service marks, logos, trade names, internet domain names, copyrights, trade secrets protections, rights in designs, rights in computer software and hardware belonging to the Company and our trade partners.
- b) The Company will protect our IP rights in accordance with Company policies and applicable laws and regulations.
- c) Employees have the responsibility to protect the Company's and our trade partners' IP during your employment and even if you should stop working for the Company, and you should understand that the Company will lawfully enforce our IP rights.

4.3 Financial Assets and Transactions

- a) Employees are expected to ensure that all Company's financial assets and transactions are executed according to management's authorisation. Employees who spend Company's funds should ensure that the Company receives good value in return and must maintain accurate records of such expenditures. Employees who approve or certify the correctness of an invoice or voucher should ensure that the purchase and amount are proper and correct.
- b) Under no circumstances should "false" invoices or misleading documentation be created or fictitious sales, purchases, services, loans or other financial arrangements are engaged.

4.4 Company Equipment / Vehicles

- a) Company's equipment and vehicles are used solely for the conduct of the Company's business only. In the case of the Company's vehicles, they are used strictly for transportation of the Company's goods. Illegal activities carried out on Company's premises, in Company's vehicles or while on Company's business will not be condoned.

The following are examples of activities which are prohibited:

- Consumption and storage of alcoholic beverages, drug or cigarettes;
- The unlawful manufacturing, distribution, dispensation, possession, transfer, sale, purchase or use of a controlled substance;
- Driving vehicles or operating Company's machinery/equipment while under the influence of alcohol, drug or controlled substances;
- Illegal betting or gambling; or
- Carrying weapon of any sort.

- b) It is a violation of the Company's policy to store any contraband, illegal drugs, weapons or toxic materials not authorized by the Company on Company's property. The Company reserves the right to inspect any property that might be used by employees for the storage of your personal effects. This includes drawers, lockers and vehicles owned by the Company.

5. ACCURACY IN RECORDKEEPING

The integrity of our Company recordkeeping is critical to maintaining the trust of the public, our customers and business partners. Employees have the responsibility to follow all internal controls in recording and maintaining the Company's records. In every transaction, whether filing an expense report, preparing a financial statement or simply completing a time sheet, we are honest, accurate and complete.

5.1 Financial Integrity

- a) We require that all accounting or financial reporting accurately reflect our transactions, comply with policy, procedural and legal requirements.
- b) Employee must adhere to these rules:
- Follow all internal processes, controls and accounting principles, ensuring that our records accurately and fairly reflect all transactions.
 - Be accurate, honest and complete in all aspects of recordkeeping including: accounting records, financial statements, expense reports, time sheets, purchase orders, sales invoices, etc.
 - Never falsify or misrepresent any book, record, account or transaction.
 - Do not make any payment on the Company's behalf without required approval. If you are a manager, this includes the review and approval of an employee's expense report.
 - Protect, store and dispose information in accordance with legal requirements and our internal records management policies.
 - Cooperate with all reasonable requests for information from government and regulatory agencies and cooperate fully with any government audits or investigations.
 - Protect confidential information, disclosing it only to those who are authorized to see it and only if you are authorized to do so.

6. HUMAN RIGHTS

- a) In alignment to internationally recognized standards and local laws, the Company commits to respect the human rights of employees, and to treat them with dignity and respect as understood by the international community.
- b) It is our commitment to implement ethical, fair and equal employment opportunity practices on the basis of qualification, ability, skills, experience and suitability regardless of age, race, gender, gender identity, religion, marital status, medical condition, mental or physical disability, national origin, political and/or third party affiliation or veteran status.

- c) We conform to all labor legislative requirements and adopt government guidelines on working hours, wages and benefits, and others, which promote fair employment practices, if applicable.
- d) Forced labor in any form, including but not limited to, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted.
- e) Child labor shall not be used in any stage of manufacturing. There shall not be recruitment of any child labor under 18.
- f) Working hours shall not exceed the maximum set by local law. Further, a work week shall not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime shall be voluntary. Employees shall be allowed to have at least one day off every seven days.
- g) All employees shall receive equal pay for equal work and qualification according to Company policies. Eligible employees shall be compensated for approved overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted.
- h) The Company commits to a workplace free of harassment and unlawful discrimination. There shall be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of employees; nor is there to be the threat of any such treatment. employees shall be provided with reasonable accommodation for religious practices and disability taking into consideration employees' safety and impact to business.
- i) Employees and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment. The Company shall respect the right of all employees to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of employees to refrain from such activities.
- j) We expect our business partners to operate ethically, in compliance with the law and our policies. We periodically audit our suppliers to ensure compliance with these requirements.

7. COMMUNICATING ABOUT SUNNINGDALE TECH

Employees have the responsibility to safeguard the Company and our information by ensuring that communications about our Company are consistent, accurate and complete and that sensitive information is protected from unauthorized disclosure.

All business dealings shall be transparently performed and accurately reflected on our business books and records. Information regarding our labor, health and safety, environmental practices, business activities, structure, financial situation, and performance shall be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable. Public information must not make false or misleading statements about our products, services, opportunities and position.

7.1 Speaking on behalf of Sunningdale TECH

- a) To ensure that accurate and complete information is conveyed to the public, regulatory authorities and others, we have designated individuals to serve as our official Company spokespersons. Unless you are authorized to do so, do not make any statements on behalf of the Company.

7.2 Audits and Investigations

- a) The Company will comply with requests for information by government and regulatory agencies, as required by law, and cooperate fully with investigations.
- b) If you receive an inquiry from a government official or agency, promptly contact your Head of Department for assistance. Do not provide information to any governmental or other authority without approval.
- c) If you are questioned as part of an external or internal investigation or audit, you have a duty to cooperate and provide honest, accurate and complete information.

7.3 Social Media

- a) Employees have a responsibility to use good judgment in your online activity and comply with all applicable laws.
- b) Employees are responsible for the content you publish. Employees must follow the following rules:
 - Do not make false or unsubstantiated claims about the Company and our products, customers, etc.
 - Do not make any statements on behalf of the Company unless you are specifically authorized to do so.
 - If you are not authorized to speak on our behalf, and you write something related to the Company, make sure you identify yourself as an employee and state that your views are solely your own and not the Company's.
 - Do not disclose confidential information about the Company and our products, customers, etc.

8. Environment, Health and Safety

8.1 Protecting the Environment

Across all business functions, the Company recognizes that environmental responsibility is integral to producing world-class products. The Company systematically identifies the environmental impacts and minimizes adverse effects on the community, environment, and natural resources, while safeguarding the health and safety of the public.

8.2 Preventing Injuries and Illnesses

The Company is committed to keeping employees safe and free from injury and illness at the workplace. The management recognizes that in addition to minimizing the incidence of work-related injuries and illnesses, a safe and healthy working environment enhances the quality of products and services, consistency of production

and worker retention and morale. Ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace.

Safety is everyone's responsibility. Employees must follow the following rules:

- Be an advocate of a safety culture at Sunningdale Tech.
- Complete all required training to help reduce safety risks and be familiar with the locations of fire extinguishers, emergency exits and first aid kits.
- Know the procedures for evacuating buildings in case of emergency and for reporting an injury or illness.
- Be alert and aware of what is going on around you, follow all safety and security processes and speak up if you witness any safety hazards, property damage or personal injuries.

REPORTING VIOLATIONS

Employees, individuals and third parties should be alert to potential and actual violations of the code anywhere in the Company and are urged to report such violations promptly. Reports can be made to the employee's department manager, Internal Audit Manager, CFO, CHRO or directly to the CEO as spelled out in the Whistle-blowing policy.

The public can also report any violations through the whistle-blowing contact channels:

- Email address: whistle-blowing@sdaitech.com, attention to "The STL Whistle-Blowing Committee"; and/or
- Mail address: 51 Joo Koon Circle, Singapore 629069, attention to "The STL Whistle-Blowing Committee"

All cases of questionable activity or potentially improper operation will be reviewed or investigated for appropriate action to be taken. Employees are expected to co-operate fully in any investigation of violations when called upon.

The Company will keep confidential the identity and anonymity of anyone reporting a possible violation. The Company will support anyone who raises concerns in good faith under this code of conduct. The Company will take all reasonable measures to ensure that whistle-blowers will be protected from any plausible reprisals by any Company officials or fellow colleagues.

If employees have reason to believe that you are subjected to unjust treatment as a result of a concern, you should report to HR and/or your department head immediately.

A malicious or frivolous complaint or allegation made by an employee against company official or fellow colleagues, however, may result in the Company, after proper investigation, taking disciplinary action against you.

DISCIPLINE

Any violation of this code can result in serious consequences for the Company's credibility and confidence of its customers. It may also include substantial fines and restrictions on future operations as well as the possibility of fines and imprisonment for individual employees. Therefore, it is imperative that the Company ensures that there will be no violations. Employees should recognise that it is in your best interest, as well as the Company's, to abide by this code.

Investigation or inquiry should be carried out with the presence of HR representative or appropriate senior management staff. The seriousness of the case will be taken into account in determining the disciplinary action to be taken against an individual employee. Such disciplinary action might include dismissal or referral for criminal prosecution. The Company may demand reimbursement of losses or damages from the employees involved.

A disciplinary action might be taken against supervisors or managers who condone, permit or have knowledge of illegal or unethical activity but take no action.

COMMUNICATION

Training on this policy will be provided as part of the orientation process for all new employees. Refresher briefing may be conducted as and when necessary or when a potential risk of bribery or conflict of interest may exist during work activities.

A repeat declaration exercise by completing the "Declaration Form on Direct /Indirect Interest" is conducted yearly to reiterate this Code to employees as well as to attest to employees' compliance.

MONITORING AND REVIEW

The Company is committed to due diligence and continuous improvement in upholding the principles in this Code. The CFO, CHRO and the Internal Audit Manager are responsible for monitoring the effectiveness of this Code and will review its suitability, adequacy, and effectiveness on a regular basis.

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DOCUMENT CONTROL

Prepared by

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1	Cindy Bin	Group HR Manager	23 Oct 2008	Publish Date

Change Record

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7	1 Sept 2022	Julia Koh	Added <ul style="list-style-type: none"> - definition of bribe in clause C - advertising guidelines in clause 3.2 - reasonable religious accommodation in clause 4.2

8	1 Aug 2023	Julia Koh	Added <ul style="list-style-type: none"> - interacting with the market - protecting information - accuracy in recordkeeping - equal employment opportunity - communicating about Sunningdale Tech - a safe workplace
9	1 Apr 2024	Julia Koh	1.1 (b) Amended definition of bribe 6. Amended Human Rights 7. Updated disclosure of information in Communicating about STL 8. Amended Environment, Health & Safety