### Message to All Stakeholders

#### Dear Stakeholders,

First of all, I would like to take this opportunity to personally thank all stakeholders and this will includes all Clients, colleagues and partners of **RMA** Group, for their continued support throughout our more than 2 decades of proper business conduct and continuity in coexistence with the Community.

The **RMA** Group is committed to the highest ethical standards of operations and total compliance with all legislation and rules of governance and to be a fair employer wherever we operate. As a responsible business organization, we have always maintained a disciplined approach to our corporate governance and operate to the optimum professional standards in all aspects of our business.

**RMA** Group will always seek to provide a safe and productive work environment where all employees can grow and be challenged. Wherever we operate, our objective is to contribute actively to the Community and the local environment. An intrinsic part of our business philosophy across our product and service offerings is to be consistently environmentally responsible and to continue to improve our performance across all environmental issues wherever possible.

Conducting our business with integrity is essential to maintaining our status as one of the leading players in our industry. We owe this to ourselves and all those around us and each and every one of us have a key role to play.

It is with these thoughts in our mind that we are publishing this **Code of Conduct** on **Compliance** which sets the highest ethical standards to guide us in our business dealings. By maintaining these high standards, we will make the **RMA** Group, the kind of organization that deserves to be.

Sincerely,

David Ngoh Chief Executive Officer



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# 1

## **General Information**

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#### 1.1. Code of Conduct on Compliance

This **Code of Conduct** on **Compliance** is adopted to promote proper ethical behavior, encourage compliance with ethical standards and facilitate the reporting of unethical and illegal behavior and to address violations of ethical standards and applicable laws. In addition, third parties who represent these entities on behalf of the **RMA** Group are contractually bound to follow this Code. Each employee, officer and director is responsible for conducting themselves in compliance with this Code and applicable local laws and regulations.

#### 1.2. No Exceptions

There are reasonable rules of conduct and must be followed in any business dealings to ensure that everyone within the RMA Group work together effectively and in accordance with all laws and best business practices. Any violation of this Code will result in the appropriate disciplinary actions. Depending on the severity or frequency of the disciplinary problems, a verbal or written reprimand, suspension, disciplinary probation, financial penalty, and/or termination of an employee's employment may be necessary. In addition, an employee's failure to adhere to this Code and procedures may be taken into account in decisions regarding promotion and compensation including incentive or performance-based compensation.

#### 1.3. Whistle Blowing

Each employee, officer, and director has an obligation to report possible violations of this Code so the conduct can be considered with the situation addressed and appropriate action taken. No action will be taken against anyone for providing truthful information relating to a violation of laws.

Any person who believes he or she has been retaliated against should immediately follow the instructions as outlined below;

 Talk to the RMA Compliance Executive who is also the CEO of the RMA Group via the RMA Group Compliance Hotline at 64941518 or email at compliance@rmagroup.com.sg



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## Working Together Always

## **Working Together Always**

#### 2.1 Fair Employment

The RMA Group is committed to a work place free from discrimination and harassment. We do not discriminate or allow discrimination based on personal characteristics such as race, color, gender, religion, national origin, age, disability, or veteran status. All personnel actions including hiring, benefits, transfers, compensation and layoffs must be administered without such discrimination.

We require that all of our employees, officers, and directors understand and practice our objective of zero tolerance for any form of discrimination.

#### 2.2 The Environment, Health and Safety

The personal health and safety of each member of the RMA Group and all its stakeholders are of the highest importance. All employee, officer and director are responsible for creating and maintaining a safe and healthy work environment. Environmental compliance is a cornerstone to being and remaining a responsible corporate citizen. All employees, officers, and directors must exercise sound judgment with regards to the environmental aspects in their daily activities.

#### 2.3 Community Social Responsibility

RMA strive to demonstrate good corporate citizenship by ensuring that we have effective environmental and job-related health and safety programs throughout our operations. We participate in programs with the community to bring on social good.

RMA Group is in partnership with the community at large through our continued relationship with the South East Community Development Council of Singapore where we participate in programs that helps in the development of underprivileged and at-risk youth..





## **Proper Business Conduct**

### **Proper Business Conduct**

#### 3.1 Competition

We proudly stand behind our services and we offer them to our clients knowing that we compete fairly and honestly.

Competing fairly and honestly means we compete vigorously and independently at all times and in every lawful way. In no event may we have any agreement or understanding with a competitor regarding pricing, customers, markets, terms of sale, the provision of services, or any other area that is sensitive or significant for competition.

RMA treats everyone with whom we do business honestly and fairly in a manner that respects his or her independence. Each employee, officers, and director must try to deal honestly and fairly with RMA's customers, suppliers, competitors, and other third parties with whom we do business. We must always follow the principles of honesty and frankness in performing our jobs.

#### 3.2 No Corruption

At RMA, we do not allow any form of corruption. **RMA's employees, officers, and directors, and** any third parties acting on our behalf, are strictly forbidden from providing anyone with anything that can be considered corruption.

Corruption takes many forms – not just bribes. This policy prohibits you from offering, promising or giving anything of value (gifts, entertainment, travel expenses, unduly favorable business arrangement, etc.) as a bribe to anyone.

#### 3.3 Gift and Entertainment

Small gifts and simple entertainment are acceptable we sometimes exchange business courtesies such as meals, entertainment, gifts, and other items with our clients, suppliers, and others with whom we do business in order to build a stronger business relationship through fostering goodwill.



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## **Dealing with Information**

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#### 4.1 No External Information Sharing

In our business, we are often entrusted with that business information, and we may not take advantage of our special knowledge for our personal gain or others' personal gain. This also extends to information about our clients or suppliers. At RMA, we treat sensitive information we receive from clients, suppliers and other business associates as carefully as we treat our own information.

#### 4.2 No Conflict of Interest

All conflict of interest issues must be avoided in our business conduct. A "conflict of interest" occurs when an individual's personal interests interfere with the interests of RMA. However, do note that conflicts can arise in many different situations and sometimes they may develop accidentally or unexpectedly.

Loyalty is expected from all RMA employees, officers, and directors, and that such loyalty is free of any conflicts of interest. Each employee, officer, or director, or member of his or her immediate family is expected to avoid any investment or involvement that might in any way affect the employee's, officer's, or director's actions on behalf of RMA's best interests.

#### 4.3 Protecting Information and Assets

All employees, officers, and directors must protect RMA's assets and ensure their efficient use. Furthermore, RMA's assets must be used for legitimate business purposes at all times.

In addition, we often work with information that is confidential or proprietary to RMA. Some of this information come from RMA's own activities, including research projects, operational improvements, and general business processes and communications. Other types of information may come from our clients, suppliers or other third parties with whom we conduct business. This information is often confidential to them and is given to us in order to conduct our business. Some clients provide us information subject to confidentiality agreement.

It is RMA's policy that all such confidential information shall be distributed within RMA on a strict "need-to-know" basis.