



# SP GROUP SUPPLIER CODE OF CONDUCT

Extracted from SP Group's Anti-Bribery Management System Manual dated 3 September 2020

## SUPPLIER CODE OF CONDUCT

### **1. OBJECTIVE AND SCOPE**

- 1.1 This Supplier Code of Conduct sets out SP Group's expectations and requirements in relation to doing business with its business associates, such as suppliers, contractors, agents, sales representatives, consultants and others who provide goods or services to SP Group (collectively called "Suppliers").
- 1.2 SP Group is committed to doing business and conducting its operations with integrity, honesty and in compliance with all applicable laws and regulations.
- 1.3 SP Group requires its Suppliers to adopt the same approach when carrying out work on behalf of or providing goods or services to SP Group. SP Group will review its relationships with Suppliers who breach and fail to comply with these requirements.

### **2. ANTI-BRIBERY & CORRUPTION**

- 2.1 SP Group adopts a zero-tolerance policy towards any form of bribery and corruption.
- 2.2 In all their interactions and transactions with SP Group, SP Group requires the Suppliers to:
  - 2.2.1 comply with all "Anti-Bribery Laws", which is defined as: all applicable national, regional, provincial, state, municipal or local laws, rules, regulations, decrees and/or official government orders that prohibit bribery and corruption, such as the Singapore Prevention of Corruption Act [Cap. 241];
  - 2.2.2 never engage in any bribery or corruption;
  - 2.2.3 disclose any actual or potential conflict of interest between the Supplier and SP Group; and
  - 2.2.4 provide full assistance to SP Group regarding any investigation into any breach or alleged breach of Anti-Bribery Laws in relation to the Supplier.

### **3. COMPLIANCE**

- 3.1 If the Supplier fails to comply with this Supplier Code of Conduct, SP Group may, where applicable, suspend or terminate contract(s) with the Supplier, suspend any payment under contract(s) with the Supplier, report any offence to the appropriate government or regulatory authorities and/or pursue any remedy that is available to SP Group.
- 3.2 SP Group, in its sole discretion, may debar Suppliers for criminal offences, ethics violations, poor performance, withdrawal of tenders or any other infringements as may be determined by SP Group. Debarred Suppliers will not be allowed to participate in any SP Group tenders during the debarment period. The debarment period typically ranges from 1 to 5 years, depending on the severity of the Supplier infringements. At the end of the debarment period, debarred Suppliers can apply to SP Group's Procurement department to be qualified as an eligible tenderer again.

#### 4. WHISTLEBLOWING POLICY

4.1 Any Supplier who has reason to believe that an SP Group employee, or anyone acting on behalf of SP Group, has engaged or is engaging in bribery, corruption, illegal or any type of unethical behaviour, can promptly report the matter to SP Group's Head of Internal Audit via one of the following communications channels:

- Telephone: +65 6684 9178
- Email: [whistleblow@spgroup.com.sg](mailto:whistleblow@spgroup.com.sg)
- Postal Address: **Head, Internal Audit, SP Group, 2 Kallang Sector, Singapore 349277**

4.2 A whistle-blowing complaint shall, to the extent possible, include the following information:

- Where the whistleblower is employed or whistleblower's relationship to SP Group;
- Date, time & place of the actions/ transactions;
- Identity and particulars of the parties involved;
- Evidence substantiating the allegations;
- Any relevant information concerning the allegations; and
- Contact details (to facilitate follow up queries).

4.3 Subject to applicable laws and regulations, SP Group will take reasonable steps to protect the confidentiality and anonymity of the whistleblower consistent with the need to conduct an adequate review. All whistleblowing complaints shall be dealt with independently, fairly and expeditiously.

4.4 SP Group encourages whistleblowers to identify themselves and provide their contact particulars. SP Group is committed to protect whistleblowers under its Whistleblower Policy. Further clarifications are often needed and helpful in facilitating investigations into the whistleblowing complaints. The ability to investigate depends on the sufficiency and quality of the information provided by the whistleblower.

4.5 Except for malicious whistleblowing, a whistleblower who makes a complaint shall be protected against any reprisal. If the results of an investigation show that the whistleblower acted maliciously or did not act in good faith or submits a whistleblowing complaint which he knows to be false, or without a reasonable belief in the truth and accuracy of the information, management will consider and take appropriate actions against the whistleblower.



新加坡能源集团  
《供应商行为准则》

节选自新加坡能源集团于 2020 年 9 月 3 日制定的《反贿赂和腐败管理体系手册》

## 《供应商行为准则》

### 1. 目的和范围

- 1.1 本《供应商行为准则》规定了新加坡能源集团对与其业务伙伴开展业务的期望和要求，如供应商、承包商、代理商、销售代表、顾问以及向新加坡能源集团提供货物或服务的企业（统称为“供应商”）。
- 1.2 新加坡能源集团致力于以诚信、诚实以及遵守所有适用法律法规的原则开展业务和运营。
- 1.3 新加坡能源集团要求其供应商在代表其开展业务或向其提供货物或服务时采用一致方法。新加坡能源集团将审核其与违反和未能遵守这些要求的供应商的关系。

### 2. 反贿赂和腐败

- 2.1 新加坡能源集团对任何形式的贿赂和腐败都采取零容忍政策。
- 2.2 新加坡能源集团要求供应商在与其往来和交易过程中，做到以下几点：
  - 2.2.1 遵守所有“反贿赂法”，其定义为：遵守禁止贿赂和腐败的所有适用的国家、地区、省、州、市或地方法律、规则、条例、法令和/或政府官方命令，如《新加坡预防腐败法》（第 241 章）；
  - 2.2.2 决不从事任何贿赂或腐败行为；
  - 2.2.3 披露供应商和新加坡能源集团之间的任何实际或潜在利益冲突；以及
  - 2.2.4 就与供应商相关的任何违反或涉嫌违反“反贿赂法”的调查，向新加坡能源集团提供全面协助。

### 3. 合规

- 3.1 如果供应商未能遵守《供应商行为准则》，新加坡能源集团可在适当的情况下暂停或终止履行与供应商签订的合同、暂停支付合同项下的款项、向政府或监管部门报告违规行为和/或寻求新加坡能源集团可以采取的救济措施。
- 3.2 新加坡能源集团可全权决定因供应商从事刑事犯罪、违反道德规范、表现不佳、撤回投标或其认定的任何其他违规行为而禁止供应商投标。被禁止的供应商在禁止期不得参与任何新加坡能源集团的招标项目。根据供应商违规的严重程度，禁止期通常为 1 至 5 年。禁止期结束时，被禁止的供应商可向新加坡能源集团的采购部门申请再次成为合格投标人。

## 4. 举报政策

4.1 任何供应商如有证据表明新加坡能源集团的员工或代表新加坡能源集团行事的任何人参与或正在参与贿赂、腐败、非法或任何类型的不道德行为，可通过任意以下渠道立即向新加坡能源集团的内部审计长报告此事：

- 电话：+65 6684 9178
- 邮箱：whistleblow@spgroup.com.sg
- 邮寄地址：**Head, Internal Audit, SP Group, 2 Kallang Sector, Singapore 349277**

4.2 举报和投诉的内容应尽可能包括以下信息：

- 举报人的工作单位或举报人与新加坡能源集团的关系；
- 行为/或交易发生的日期、时间和地点；
- 参与方的身份和详细信息；
- 证实指控的证据；
- 与指控相关的所有信息；以及
- 联系方式（便于后续调查询问）。

4.3 根据适用的法律法规，为满足充分调查的必要性，新加坡能源集团将采取合理措施保护举报人的保密和匿名要求。所有的举报和投诉都应被独立、公平、及时地处理。

4.4 新加坡能源集团鼓励举报人表明身份，并提供联系方式。新加坡能源集团致力于根据其《举报人政策》保护举报人。通常需要（与举报人）进一步澄清，因其有助于调查举报和投诉。调查能力取决于举报人所提供信息的数量和质量。

4.5 除恶意举报外，应保护提出投诉的举报人免受报复。如果调查结果表明，举报人恶意行事或未诚信行事或提交了虚假的举报和投诉内容或不能合理判断信息的真实性和准确性，管理层将考虑并采取合理措施处罚举报人。



**SP GROUP SUPPLIER CODE OF CONDUCT  
[QUY TẮC ỨNG XỬ CỦA NHÀ CUNG CẤP  
CỦA SP GROUP]**

Extracted from SP Group's Anti-Bribery Management System Manual dated 7 September 2022  
[Trích từ Sổ tay Hệ thống Quản lý Chống Hối lộ của SP Group ngày 7 tháng 9 năm 2022]

## SUPPLIER CODE OF CONDUCT [QUY TẮC ỨNG XỬ CỦA NHÀ CUNG CẤP]

### 1. OBJECTIVE AND SCOPE [MỤC TIÊU VÀ PHẠM VI]

- 1.1 This Supplier Code of Conduct sets out SP Group's expectations and requirements in relation to doing business with its business associates, such as suppliers, contractors, agents, sales representatives, consultants and others who provide goods or services to SP Group (collectively called "Suppliers").

Quy tắc Ứng xử dành cho Nhà cung cấp này đặt ra các kỳ vọng và yêu cầu của SP Group liên quan đến việc kinh doanh với các đối tác kinh doanh của SP Group, chẳng hạn như các nhà cung cấp, nhà thầu, đại lý, đại diện bán hàng, các bên tư vấn và những bên khác cung cấp hàng hóa hoặc dịch vụ cho SP Group (gọi chung là "Nhà Cung Cấp").

- 1.2 SP Group is committed to doing business and conducting its operations with integrity, honesty and in compliance with all applicable laws and regulations.

SP Group cam kết kinh doanh và tiến hành các hoạt động với sự liêm chính, trung thực và tuân thủ tất cả các luật và quy định hiện hành.

- 1.3 SP Group requires its Suppliers to adopt the same approach when carrying out work on behalf of or providing goods or services to SP Group. SP Group will review its relationships with Suppliers who breach and fail to comply with these requirements.

SP Group yêu cầu các Nhà Cung Cấp áp dụng cách tiếp cận tương tự khi thực hiện công việc thay mặt hoặc cung cấp hàng hóa hoặc dịch vụ cho SP Group. SP Group sẽ xem xét lại các mối quan hệ với các Nhà Cung Cấp có hành vi vi phạm và không tuân thủ các yêu cầu này.

### 2. ANTI-BRIBERY & CORRUPTION [CHỐNG HỐI LỘ VÀ THAM NHŨNG]

- 2.1 SP Group adopts a zero-tolerance policy towards any form of bribery and corruption.

SP Group áp dụng chính sách không khoan nhượng đối với bất kỳ hình thức hối lộ và tham nhũng nào.

- 2.2 In all their interactions and transactions with SP Group, SP Group requires the Suppliers to:

Trong tất cả các tương tác và giao dịch với SP Group, SP Group yêu cầu các Nhà Cung Cấp phải:



2.2.1 comply with all “Anti-Bribery Laws”, which is defined as: all applicable national, regional, provincial, state, municipal or local laws, rules, regulations, decrees and/or official government orders that prohibit bribery and corruption, such as the Singapore Prevention of Corruption Act [Cap. 241];

tuân thủ tất cả "Luật Chống Hối Lộ", được định nghĩa là: tất cả các luật, quy tắc, quy định, nghị định và/hoặc lệnh chính thức của chính phủ hiện hành, khu vực, tỉnh, tiểu bang, thành phố hoặc địa phương nghiêm cấm hối lộ và tham nhũng, chẳng hạn như Đạo Luật Phòng Chống Tham Nhũng Singapore [Chương 241];

2.2.2 never engage in any bribery or corruption;

không bao giờ thực hiện bất kỳ hành vi hối lộ hoặc tham nhũng nào;

2.2.3 disclose any actual or potential conflict of interest between the Supplier and SP Group; and

tiết lộ bất kỳ xung đột lợi ích thực tế hoặc tiềm ẩn nào giữa Nhà Cung Cấp và SP Group; và

2.2.4 provide full assistance to SP Group regarding any investigation into any breach or alleged breach of Anti-Bribery Laws in relation to the Supplier.

hỗ trợ đầy đủ cho SP Group về bất kỳ cuộc điều tra nào về bất kỳ vi phạm hoặc cáo buộc vi phạm Luật Chống Hối Lộ nào liên quan đến Nhà Cung Cấp.

### 3. COMPLIANCE (TUÂN THỦ)

3.1 If the Supplier fails to comply with this Supplier Code of Conduct, SP Group may, where applicable, suspend or terminate contract(s) with the Supplier, suspend any payment under contract(s) with the Supplier, report any offence to the appropriate government or regulatory authorities and/or pursue any remedy that is available to SP Group.

Nếu Nhà Cung cấp không tuân thủ Quy Tắc Ứng Xử này của Nhà Cung Cấp, SP Group có thể đình chỉ hoặc chấm dứt [các] hợp đồng với Nhà Cung Cấp, đình chỉ bất kỳ khoản thanh toán nào theo [các] hợp đồng với Nhà Cung Cấp, báo cáo bất kỳ hành vi vi phạm nào cho chính phủ hoặc các cơ quan có thẩm quyền thích hợp và/hoặc theo đuổi bất kỳ biện pháp khắc phục nào mà SP Group có thể áp dụng.

3.2 SP Group, in its sole discretion, may debar Suppliers for criminal offences, ethics violations, poor performance, withdrawal of tenders or any other

infringements as may be determined by SP Group. Debarred Suppliers will not be allowed to participate in any SP Group tenders during the debarment period. The debarment period typically ranges from 1 to 5 years, depending on the severity of the Supplier infringements. At the end of the debarment period, debarred Suppliers can apply to SP Group's Procurement department to be qualified as an eligible tenderer again.

SP Group có toàn quyền ngăn cấm các Nhà Cung Cấp vì các hành vi phạm tội hình sự, vi phạm đạo đức, hiệu suất kém, rút hồ sơ thầu hoặc bất kỳ vi phạm nào khác có thể được xác định bởi SP Group. Các Nhà Cung Cấp bị cấm sẽ không được phép tham gia vào bất kỳ đấu thầu nào của SP Group trong thời gian bị ngăn cấm. Thời gian ngăn cấm thường là từ 1 đến 5 năm, tùy thuộc vào mức độ nghiêm trọng của các vi phạm của Nhà Cung Cấp. Vào cuối thời hạn ngăn cấm, các Nhà Cung Cấp bị ngăn cấm có thể nộp đơn cho Bộ Phận Mua Sắm của SP Group để xem xét điều kiện trở lại là nhà thầu đủ điều kiện.

#### 4. WHISTLEBLOWING POLICY [CHÍNH SÁCH TỔ GIÁC]

- 4.1 Any Supplier who has reason to believe that an SP Group employee, or anyone acting on behalf of SP Group, has engaged or is engaging in bribery, corruption, illegal or any type of unethical behaviour, can promptly report the matter to SP Group's Head of Internal Audit via one of the following communications channels:

Bất kỳ Nhà Cung Cấp nào có lý do để tin rằng một nhân viên của SP Group, hoặc bất kỳ ai đại diện cho SP Group, đã tham gia hoặc đang tham gia hối lộ, tham nhũng hoặc bất kỳ loại hành vi phi đạo đức hoặc bất hợp pháp nào, có thể nhanh chóng báo cáo vấn đề cho Giám Đốc Kiểm Toán Nội Bộ của SP Group thông qua một trong các kênh truyền thông sau:

- Telephone [Điện thoại]: +65 6684 9178
- Email: [whistleblow@spgroup.com.sg](mailto:whistleblow@spgroup.com.sg)
- Postal Address [Địa chỉ bưu điện]: Head, Internal Audit, SP Group, 2 Kallang Sector, Singapore  
349277

- 4.2 A whistle-blowing complaint shall, to the extent possible, include the following information:

Khiếu nại tố giác, trong phạm vi có thể, phải bao gồm các thông tin sau:

- Where the whistleblower is employed or whistleblower's relationship to SP Group;

Nơi người tố giác được tuyển dụng hoặc mối quan hệ của người tố giác với SP Group;

- Date, time & place of the actions/ transactions;

Ngày, giờ & địa điểm của các hành động / giao dịch

- Identity and particulars of the parties involved;

Danh tính và thông tin chi tiết của các bên liên quan;

- Evidence substantiating the allegations;

Bằng chứng chứng minh các cáo buộc;

- Any relevant information concerning the allegations; and

Bất kỳ thông tin liên quan nào liên quan đến các cáo buộc; và

- Contact details [to facilitate follow up queries].

Chi tiết liên lạc [để tạo điều kiện thuận lợi cho các truy vấn tiếp theo].

- 4.3 Subject to applicable laws and regulations, SP Group will take reasonable steps to protect the confidentiality and anonymity of the whistleblower consistent with the need to conduct an adequate review. All whistleblowing complaints shall be dealt with independently, fairly and expeditiously.

Theo luật pháp và quy định hiện hành, SP Group sẽ thực hiện các bước hợp lý để bảo vệ tính bảo mật và ẩn danh của người tố giác phù hợp với nhu cầu tiến hành đánh giá đầy đủ. Mọi tố giác phải được giải quyết một cách độc lập, công bằng và nhanh chóng.

- 4.4 SP Group encourages whistleblowers to identify themselves and provide their contact particulars. SP Group is committed to protect whistleblowers under its Whistleblower Policy. Further clarifications are often needed and helpful in facilitating investigations into the whistleblowing complaints. The ability to investigate depends on the sufficiency and quality of the information provided by the whistleblower.

SP Group khuyến khích người tố giác cung cấp danh tính và thông tin liên hệ của họ. SP Group cam kết bảo vệ người tố giác theo Chính Sách Tố Giác của mình. Việc xác minh thêm thường cần thiết và hữu ích trong việc tạo điều kiện thuận lợi cho các cuộc điều tra về các tố giác. Khả năng điều tra phụ thuộc vào sự đầy đủ và chất lượng của thông tin được cung cấp bởi người tố giác.

Except for malicious whistleblowing, a whistleblower who makes a complaint shall be protected against any reprisal. If the results of an investigation show

that the whistleblower acted maliciously or did not act in good faith or submits a whistleblowing complaint which he knows to be false, or without a reasonable belief in the truth and accuracy of the information, management will consider and take appropriate actions against the whistleblower.

Ngoại trừ việc tố giác ác ý, người tố giác sẽ được bảo vệ khỏi bất kỳ sự trả thù nào. Nếu kết quả điều tra cho thấy người tố giác đã hành động ác ý hoặc không hành động thiện chí hoặc gửi tố giác mà anh ta biết là sai sự thật, hoặc tố giác khi không tin tưởng hợp lý rằng thông tin là sự thật và chính xác, ban quản lý sẽ xem xét và có hành động thích hợp đối với người tố giác.



**SP GROUP SUPPLIER CODE OF  
CONDUCT**  
**จรรยาบรรณคู่ค้าของ  
SP GROUP**

Extracted from SP Group's Anti-Bribery Management System Manual dated 3 September 2020  
คัดย่อมาจากคู่มือระบบการจัดการต่อต้านการติดสินบนของ SP Group ลงวันที่ 3 กันยายน 2020

## **SUPPLIER CODE OF CONDUCT**

### **จรรยาบรรณคู่ค้า**

#### **1. OBJECTIVE AND SCOPE**

##### **วัตถุประสงค์และขอบข่าย**

- 1.1 This Supplier Code of Conduct sets out SP Group's expectations and requirements in relation to doing business with its business associates, such as suppliers, contractors, agents, sales representatives, consultants and others who provide goods or services to SP Group (collectively called "Suppliers").

จรรยาบรรณคู่นี้ระบุถึงความคาดหวังและข้อกำหนดของ SP Group ที่เกี่ยวข้องกับการทำธุรกิจกับผู้ร่วมธุรกิจ เช่น คู่ค้า ผู้รับเหมา ตัวแทน ตัวแทนขาย ที่ปรึกษา และฝ่ายอื่นๆ ที่ทำหน้าที่จัดหาสินค้าหรือบริการให้กับ SP Group (รวมเรียกว่า "คู่ค้า")

- 1.2 SP Group is committed to doing business and conducting its operations with integrity, honesty and in compliance with all applicable laws and regulations.

SP Group มุ่งมั่นที่จะดำเนินธุรกิจและทำงานอย่างมีคุณธรรม ซื่อสัตย์สุจริต และปฏิบัติตามกฎหมายและระเบียบข้อบังคับที่เกี่ยวข้องทั้งหมด

- 1.3 SP Group requires its Suppliers to adopt the same approach when carrying out work on behalf of or providing goods or services to SP Group. SP Group will review its relationships with Suppliers who breach and fail to comply with these requirements.

SP Group กำหนดให้คู่ค้าของบริษัทใช้แนวทางเดียวกันเมื่อดำเนินงานในนามของ SP Group หรือจัดหาสินค้า หรือบริการให้กับ SP Group และ SP Group จะทบทวนความสัมพันธ์ที่มีกับคู่ค้าที่ละเมิดและไม่ปฏิบัติตามข้อกำหนดเหล่านี้

#### **2. ANTI-BRIBERY & CORRUPTION**

##### **การต่อต้านการติดสินบนและการทุจริต**

- 2.1 SP Group adopts a zero-tolerance policy towards any form of bribery and corruption.

SP Group ใช้นโยบายจัดการการติดสินบนและการทุจริตทุกรูปแบบขั้นเด็ดขาด

- 2.2 In all their interactions and transactions with SP Group, SP Group requires the Suppliers to:

ในการติดต่อทางธุรกิจและการทำธุรกรรมทั้งหมดกับ SP Group สิ่งที่ SP Group กำหนดให้กับคู่ค้าคือ:

- 2.2.1 comply with all "Anti-Bribery Laws", which is defined as: all applicable national, regional, provincial, state, municipal or local laws, rules, regulations, decrees and/or official government orders that prohibit bribery and corruption, such as the Singapore Prevention of Corruption Act (Cap. 241)

คู่ค้าต้องปฏิบัติตาม "กฎหมายต่อต้านการติดสินบน" ทั้งหมด ซึ่งมีความหมายว่าคือ: กฎหมายทั้งหมดทั้งในระดับประเทศ ภูมิภาค จังหวัด รัฐ เทศบาลหรือท้องถิ่น รวมถึงกฎเกณฑ์ ระเบียบข้อบังคับ พระราชกฤษฎีกา และ/หรือคำสั่งอย่างเป็นทางการ

ทางการของรัฐบาลที่ห้ามการติดสินบนและการทุจริต เช่น กฎหมายป้องกันการทุจริตของสิงคโปร์ (บทที่ 241)

2.2.2 never engage in any bribery or corruption;

คู่ค้าต้องไม่เคยมีส่วนเกี่ยวข้องในการติดสินบนหรือการทุจริตใดๆ

2.2.3 disclose any actual or potential conflict of interest between the Supplier and SP Group; and

คู่ค้าต้องเปิดเผยถึงผลประโยชน์ทับซ้อนที่เกิดขึ้นจริงหรือที่อาจเกิดขึ้นระหว่างคู่ค้าและ SP Group และ

2.2.4 provide full assistance to SP Group regarding any investigation into any breach or alleged breach of Anti-Bribery Laws in relation to the Supplier.

คู่ค้าต้องให้ความช่วยเหลือ SP Group อย่างเต็มความสามารถเมื่อมีการสอบสวนกรณีการละเมิดหรือข้อกล่าวหาว่ามีการละเมิดกฎหมายต่อต้านการติดสินบนที่เกี่ยวข้องกับคู่ค้า

### 3. COMPLIANCE

#### การปฏิบัติตามข้อกำหนด

3.1 If the Supplier fails to comply with this Supplier Code of Conduct, SP Group may, where applicable, suspend or terminate contract(s) with the Supplier, suspend any payment under contract(s) with the Supplier, report any offence to the appropriate government or regulatory authorities and/or pursue any remedy that is available to SP Group.

หากคู่ค้าไม่ปฏิบัติตามจรรยาบรรณคู่ค้านี้ SP Group อาจระงับหรือยกเลิกสัญญาที่ทำร่วมกับคู่ค้า ระงับการชำระเงินใดๆ ภายใต้สัญญากับคู่ค้า (ถ้ามี) รายงานความผิดต่อรัฐบาลหรือหน่วยงานกำกับดูแลที่เหมาะสม และ/หรือดำเนินการแก้ไขใดๆ ที่ SP Group สามารถทำได้

3.2 SP Group, in its sole discretion, may debar Suppliers for criminal offences, ethics violations, poor performance, withdrawal of tenders or any other infringements as may be determined by SP Group. Debarred Suppliers will not be allowed to participate in any SP Group tenders during the debarment period. The debarment period typically ranges from 1 to 5 years, depending on the severity of the Supplier infringements. At the end of the debarment period, debarred Suppliers can apply to SP Group's Procurement department to be qualified as an eligible tenderer again.

SP Group ใช้ดุลยพินิจของตนแต่เพียงผู้เดียวในการยุติการทำงานกับคู่ค้าหากคู่ค้ากระทำความผิดทางอาญา ละเมิดจริยธรรม ทำงานไม่มีประสิทธิภาพ ถอนตัวจากการประกวดราคาหรือการละเมิดอื่นๆ ตามที่ SP Group อาจกำหนด คู่ค้าที่ถูกสั่งให้ยุติบทบาทจะไม่ได้รับอนุญาตให้เข้าร่วมการประมูลใดๆ ของ SP Group ในช่วงระยะเวลาที่ถูกสั่งให้ยุติบทบาท ระยะเวลาที่ถูกสั่งให้ยุติบทบาทโดยทั่วไปจะอยู่ในช่วงตั้งแต่ 1 ถึง 5 ปี ขึ้นอยู่กับความรุนแรงของการละเมิดของคู่ค้า เมื่อสิ้นสุดระยะเวลาที่ถูกสั่งให้ยุติบทบาท คู่ค้าที่ถูกยุติบทบาทสามารถยื่นความจำนงกับแผนกจัดซื้อจัดจ้างของ SP Group เพื่อเข้าร่วมเป็นผู้เสนอราคาที่มีคุณสมบัติเหมาะสมได้อีกครั้ง

#### 4. WHISTLEBLOWING POLICY

##### นโยบายการแจ้งเบาะแส

- 4.1 Any Supplier who has reason to believe that an SP Group employee, or anyone acting on behalf of SP Group, has engaged or is engaging in bribery, corruption, illegal or any type of unethical behaviour, can promptly report the matter to SP Group's Head of Internal Audit via one of the following communications channels:

ลูกค้าใดๆ ที่มีเหตุผลให้เชื่อได้ว่าพนักงานของ SP Group หรือใครก็ตามที่ดำเนินการในนามของ SP Group ได้มีส่วนร่วมหรือกำลังมีส่วนร่วมในการติดสินบน การทุจริต การทำผิดกฎหมายหรือพฤติกรรมที่ผิดจรรยาบรรณประเภทใดๆ สามารถรายงานเรื่องดังกล่าวต่อหัวหน้าแผนกตรวจสอบภายในของ SP Group ได้ทันทีผ่านช่องทางการสื่อสารอย่างใดอย่างหนึ่งดังต่อไปนี้:

- Telephone: [+65 6684 9178](tel:+6566849178)  
โทรศัพท์: [+65 6684 9178](tel:+6566849178)
- Email: [whistleblow@spgroup.com.sg](mailto:whistleblow@spgroup.com.sg)  
อีเมล: [whistleblow@spgroup.com.sg](mailto:whistleblow@spgroup.com.sg)
- Postal Address: **Head, Internal Audit, SP Group, 2 Kallang Sector, Singapore 349277**  
ที่อยู่ทางไปรษณีย์: **Head, Internal Audit, SP Group, 2 Kallang Sector, Singapore 349277**

- 4.2 A whistle-blowing complaint shall, to the extent possible, include the following information:

ข้อร้องเรียนจากการแจ้งเบาะแสดังกล่าวจะต้องรวมข้อมูลต่อไปนี้ไว้โดยละเอียดที่สุดเท่าที่จะทำได้:

- Where the whistleblower is employed or whistleblower's relationship to SP Group;  
สถานที่จ้างงานผู้แจ้งเบาะแสดหรือความสัมพันธ์ของผู้แจ้งเบาะแสดกับ SP Group
- Date, time & place of the actions/ transactions;  
วันที่ เวลา และสถานที่เกิดการกระทำความผิด/ธุรกรรม
- Identity and particulars of the parties involved;  
ข้อมูลระบุตัวตนและรายละเอียดของฝ่ายที่เกี่ยวข้อง
- Evidence substantiating the allegations;  
หลักฐานประกอบข้อกล่าวหา
- Any relevant information concerning the allegations; and  
ข้อมูลที่เกี่ยวข้องอื่นๆ ที่เกี่ยวกับข้อกล่าวหา และ



- Contact details (to facilitate follow up queries).

รายละเอียดการติดต่อ (เพื่อช่วยให้ติดตามสอบถามเพิ่มเติมได้)

- 4.3 Subject to applicable laws and regulations, SP Group will take reasonable steps to protect the confidentiality and anonymity of the whistleblower consistent with the need to conduct an adequate review. All whistleblowing complaints shall be dealt with independently, fairly and expeditiously.

ภายใต้กฎหมายและระเบียบข้อบังคับที่เกี่ยวข้อง SP Group จะดำเนินการตามสมควรเพื่อรักษาความลับของข้อมูล และจะไม่เปิดเผยตัวตนของผู้แจ้งเบาะแส เพื่อให้สามารถดำเนินการตรวจสอบได้อย่างครอบคลุม ขอร้องเรียนที่แจ้งเบาะแสทั้งหมดจะได้รับการจัดการอย่างอิสระ ยุติธรรม และรวดเร็ว

- 4.4 SP Group encourages whistleblowers to identify themselves and provide their contact particulars. SP Group is committed to protect whistleblowers under its Whistleblower Policy. Further clarifications are often needed and helpful in facilitating investigations into the whistleblowing complaints. The ability to investigate depends on the sufficiency and quality of the information provided by the whistleblower.

SP Group สนับสนุนให้ผู้แจ้งเบาะแสระบุตัวตนและแจ้งรายละเอียดการติดต่อกลับ SP Group มุ่งมั่นที่จะปกป้องผู้แจ้งเบาะแสภายใต้นโยบายการแจ้งเบาะแสการกระทำผิดของบริษัท ค่าชี้แจงเพิ่มเติมมักจำเป็นและเป็นประโยชน์ต่องานตรวจสอบขอร้องเรียนที่ได้รับแจ้งเบาะแส การสอบสวนจะทำได้ดีมากขึ้นเพียงใดต้องพิจารณาว่าข้อมูล que ผู้แจ้งเบาะแสให้ไว้นั้นมีเพียงพอและมีคุณภาพหรือไม่

- 4.5 Except for malicious whistleblowing, a whistleblower who makes a complaint shall be protected against any reprisal. If the results of an investigation show that the whistleblower acted maliciously or did not act in good faith or submits a whistleblowing complaint which he knows to be false, or without a reasonable belief in the truth and accuracy of the information, management will consider and take appropriate actions against the whistleblower.

ยกเว้นการแจ้งเบาะแสจากผู้ไม่ประสงค์ดี ผู้แจ้งเบาะแสที่ทำการร้องเรียนจะได้รับการคุ้มครองจากการตอบโต้ใดๆ หากผลการสอบสวนพบว่าผู้แจ้งเบาะแสกระทำการโดยมีเจตนาร้ายหรือไม่ได้กระทำการโดยสุจริต หรือส่งขอร้องเรียนเพื่อแจ้งเบาะแสซึ่งตนทราบดีว่าเป็นเท็จ หรือไม่มีเหตุผลให้เชื่อในข้อเท็จจริงและความถูกต้องของข้อมูล ฝ่ายบริหารจะพิจารณาและดำเนินการที่เหมาะสมต่อผู้แจ้งเบาะแส