

POLICY

COMPLIANCE WITH LAWS





Beyond inspection

REVISION LOG / HISTORY

Revision	Prepared by	Date	Change Description
1.0	Ddary Gao	2023/05/16	New release





Beyond inspection

FOREWORD

(Not applicable)



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1 PURPOSE

Senergy Technical Services Limited and its affiliated entities (hereinafter referred to as STS), is committed to conducting its business ethically and in full compliance with the applicable laws and regulations.

This policy establishes the requirement that all employees of STS comply with the laws of countries where it operates and achieve its aims through ethical business practices.

2 APPLICABILITY

This policy is applicable for all employees of STS.



3 REFERENCES

00-STM-0020-EN	STS Founders Commitments
00-POL-0010-EN	Whistleblower Protection Policy
00-POL-0120-EN	Confidentiality Policy
00-POL-1010-EN	Employee Code of Conduct



4 TERMS AND DEFINITIONS

COMPLIANCE WITH LAW

The act of following or obeying laws and regulations set by governing bodies. It involves adhering to a set of standards and practices designed to ensure that an individual, corporation, or organization operates within the bounds of applicable laws, regulations, and policies.

FRAUD

Deliberately deceiving others to obtain an illegitimate gain or to circumvent legal obligations or organizational rules. Fraudulent behavior implies factual and intentional elements, and the concealment of unauthorized actions.



5 RESPONSIBILITIES

It is the responsibility of all STS employees to:

- Comply with all internal policies and regulations.
- Identify potential fraud risks within our business activities and establish effective internal control procedures.
- Raise awareness among our external or temporary colleagues and co-workers of the risk of fraud, specifying the rules that must be complied with and everyone's rights and duties.
- Carry out regular audits of the pertinence of the internal control system.

It is the responsibility of STS to comply with laws in the country where it does business. STS shall offer training or explanation to all employees to make sure they understand the importance of compliance.



6 PRINCIPLES

As a provider of conformity assessment and advisory services, STS must act in compliance with the laws of the countries where it operates. The company established policies and regulations in order to adapt to such local requirements.



7 STATEMENTS / REQUIREMENTS

7.1 COMPLIANCE WITH LAW REQUIREMENTS

STS complies with the laws of the countries where it conducts its business. Legislation covering various aspects of STS' activities can be complex, and employees need to know the rules that apply to STS and to them as individuals.

When this policy imposes more stringent standards than those mandated by applicable laws, employees must comply with the more stringent standards.

In the course of STS business, employees may be contracted by regulatory agencies or government officials in relation to an enquiry involving STS. In the event of non-routine requests for information or documentation, employees must seek advice from STS legal resources. Under no circumstances should anyone acting on behalf of STS attempt to mislead, conceal evidence, destroy documents or otherwise obstruct any legitimate investigation.

Violations of this policy will not be tolerated and may result in disciplinary action, up to and including termination of employment. In addition, any employee found to have engaged in unlawful conduct may be subject to legal and financial penalties, including criminal prosecution.

7.2 COMPLIANCE PROGRAM

To ensure that all STS employees understand and adhere to the principles of compliance with law, the following requirements must be met:

7.2.1 Accuracy of record

The company must keep accurate and complete records of its business transactions in accordance with all applicable legal requirements for a period of 10 years minimum.

7.2.2 Confidentiality of information

The company must protect confidential information to which it has access, whether the information belongs to the company or to third parties.

7.2.3 Communication

All employees shall seek to communicate clearly and accurately with co-workers, clients and other stakeholders in a manner consistent with the company's values and in compliance with applicable laws and regulations.

7.2.4 Report policy violations

Employees who become aware of any violation of this policy must report it to their supervisor or manager. No employee will be retaliated against for reporting a violation of this policy.

7.3 REVIEW AND REVISION

To ensure that the policy remains relevant and effective, STS shall conduct periodic reviews and control the revision process. Reviews shall consider changes to STS' operating environment, legal and regulatory requirements.

7.4 CONSULTATION

The company expects all employees to comply with this policy in order to ensure that our business is conducted lawfully and ethically. By adhering to this policy, we can help ensure the continued success of STS while also maintaining our commitment to compliance with applicable laws and regulations.

When in doubt as to how to resolve a contradiction between this policy and applicable laws, employees should seek guidance from the Legal, Compliance & Governance Department.

