STTGDC Pte Ltd

Supplier Code of Conduct

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Supplier Code of Conduct

Introduction

STTGDC is one of the fastest-growing data centre providers in the world. We specialise in delivering and providing scalable end-to-end data centre solutions, support services, and cloud infrastructure solutions across major economic markets.

We have achieved recognition as a leader in complex, high-growth markets delivering reliable, resilient, and responsible digital infrastructure. Such recognition builds and inspires continued trust in STTGDC and commits us to continuously live up to our values.

Our Values

STRIVE FOR EXCELLENCE - By challenging assumptions and pushing boundaries through a culture of innovation, we will continuously improve and excel.

DELIVER CONSISTENCY - By creating responsible, dependable, and replicable processes across our network, we will establish trustworthiness and demonstrate accountability.

BE SOCIALLY RESPONSIBLE - By adopting a safety-first mindset and respecting the differences that define us, we will always do right by people and planet.

HAVE GRIT - By embracing a can-do attitude and going the extra mile, we persevere through complex challenges with the passion and strength of character needed to succeed.

ACT WITH INTEGRITY - By committing to our promises and genuine transparency, we will operate with a productive spirit of candour and openness.

Our values promote a culture of care that we now encourage our suppliers and their employees, personnel, agents and subcontractors (“Suppliers”) to adopt as well for the benefit of greener, more equitable and inclusive societies.

In this regard, the STTGDC Supplier Code of Conduct (“CoC”) signals our clear position and expectations to our Suppliers in respect to Business Integrity, Environmental, Social and Governance (ESG) issues.

Adoption of Code of Conduct

The CoC provides specific requirements covering a range of issues. Our expectation is that our Suppliers comply fully with the Code of Conduct.

Suppliers are responsible for complying with this CoC when conducting business with or on behalf of STTGDC and subsidiaries and shall follow the specific guidelines provided in this CoC.

Suppliers are expected to ensure their employees, subsidiaries, sub-contractors, and sub-suppliers to comply with and implement the CoC throughout their supply chains as well.

Should the Supplier find itself in violation or at risk of violation of the CoC, it shall immediately notify the contact person of STTGDC, a management member of STTGDC, or through the relevant reporting mechanisms specified at the end of this CoC.

It is recognised that some Suppliers may have other agreements and/or contracts with STTGDC which include requirements overlapping this CoC. Should any discrepancy arise between the documents, the Supplier is expected to follow the more stringent requirement laid out.

Laws and Regulations[1]

Anti-Corruption

Suppliers must comply with all applicable anti-corruption laws, including local anti-corruption laws, the Singapore's Prevention of Corruption Act 1960, UK Bribery Act and the United States Foreign Corrupt Practices Act.

In doing so, Suppliers shall never offer, pay, or accept anything of value to and from its business partners that would jeopardise the integrity of its business dealings.

'Anything of value' should be broadly interpreted to include cash, gifts, forgiveness of a debt, loans, personal favours, entertainment, meals and travel, political and charitable contributions, business/employment opportunities and medical care, among other items. These include any payments or gifts made through a third party, in circumstances where it is known or should be known that these third parties are likely to offer these payments or gifts to the parties in question.

Suppliers are responsible to develop their own anti-corruption and anti-bribery policies as well as self-auditing mechanisms.

Anti-Money Laundering and Anti-Terrorism Financing

STTGDC adopts a zero-tolerance approach to any form of money laundering or terrorism-financing. Suppliers are expected to comply with all relevant laws and be particularly attentive to cross border transfers of monies which could be construed as attempts to launder money.

[1] For example (UK) Criminal Finances Act 2017

Suppliers must monitor their operations and ensure that money laundering schemes are effectively eliminated from their operations. The Suppliers shall develop their own anti-money laundering policies as well as self-auditing mechanisms.

Anti-trust, fair competition

Suppliers shall never engage with competitors in order to practice monopolistic behaviours such as price fixing, rig bidding or market divisions. They must comply with all applicable anti-trust and fair competition laws in the locations of their operations. The Suppliers are requested to develop their own anti-trust and fair competition policies as well as self-auditing mechanisms.

Intellectual Property

Suppliers are expected to maintain the confidentiality of STTGDC's intellectual property and prevent the usage and circulation of such intellectual property beyond what is permitted under their contractual arrangements with STTGDC. Such intellectual property includes copyrights, patents, trademarks, trade secrets or other intellectual property. Where the usage of any STTGDC's intellectual property is unclear, the Supplier is expected to notify and obtain approval from the relevant STTGDC contact person before taking any action or usage or circulation of such intellectual property.

The Supplier must comply with all applicable intellectual property laws in the locations of their operations.

Data Privacy

All Suppliers must strictly comply with all applicable laws and regulations regarding personal data. These include among others Singapore's Personal Data Protection Act (PDPA), the European General Data Protection Regulation (EU GDPR) and the UK General Data Protection Regulation (UK GDPR).

Business Ethics and Expectations

Licence to operate

Suppliers shall observe and comply with all applicable laws and regulations in their respective countries of operations. We expect our suppliers to have the legal right and necessary licences to operate in all countries there they do business with STTGDC.

Conflicts of interest

Suppliers shall avoid situations that create actual or perceived conflicts of interest with STTGDC. For example, this would include leveraging on family members or friends within STTGDC who would be able to influence the decision-making process of STTGDC to the Supplier's favour. Such relationships and other conflicts of interests should be disclosed to STTGDC.

Gifts, Meals and Entertainment (GMETs)

Gifts, Meals and Entertainment must not be used with the expectation of contractual/financial obligations or to gain favour and/or influence STTGDC's decision making process. Such GMETs should not be unreasonably expensive, should be appropriate to the professional nature of the

relationship and to the customs of the cultures that both STTGDC and the Supplier's representatives originate from and shall be subject to the applicable local STTGDC entities' GMET policies (if any).

Should a representative of the Supplier find themselves in situations where GMETs are offered inappropriately, they must refuse them and report such instances to the Supplier or to STTGDC where the expected favour involves STTGDC.

Communication (marketing by Suppliers bearing STTGDC's name)

Suppliers must ensure that the use of STTGDC's name within any of its marketing materials or communications with external bodies is approved by their contact person with STTGDC prior to such use. This would include, among other things, references to STTGDC's name and other associated images on the company website and other digital domains, as well as referencing STTGDC as a client with potential new clients.

Product and Service Quality

Suppliers are expected to uphold a consistently high quality of their products and services for all their clients, ensuring that they comply with any applicable regulatory quality and safety standards of their locations of operations. This is in addition to industry-recognised quality and safety standards and contractually agreed upon terms between STTGDC and the Supplier.

Suppliers are also responsible for ensuring that the goods and services they procure in pursuit of fulfilling contractual requirements to STTGDC are done so in a responsible manner. This includes ensuring that approval of all purchases is in good order, and approved by STTGDC, with an authorised purchase order and contract available where required. Suppliers are expected to conduct their own due diligence and ensure that the third parties engaged by the Supplier are assessed for risks such as those presented in the CoC, ensuring that these third parties are free from social and environmental infringements, as mentioned below (e.g., prohibition of child labour, fair and safe conditions). Lastly, Suppliers shall not sub-contract work to other third parties unless contractually agreed between STTGDC and Supplier or with written consent from STTGDC.

Business Records (clear and transparent)

Suppliers are expected to ensure that they record all relevant business information accurately, comprehensively and in a timely manner, in accordance with all applicable laws at the locations of their operations. They are expected to maintain these records and dispose of them in appropriate manners in compliance with the applicable laws and auditing practices of the relevant country and ensure that their business is conducted in a transparent and recordable manner.

Insider Trading

Suppliers are responsible for complying with laws and regulations regarding securities and insider trading. They must not use information obtained through business dealings with STTGDC to personally benefit themselves, their employees or other third parties.

Fair Employment and Human Rights Practices

STTGDC is completely opposed to violations of human rights. We expect our Suppliers to commit to fair employment practices (such as clear and fair terms of employment in terms of salaries, leave

days and notice time), and to conduct their own due diligence to avoid any infringements as a result of activities involving for example modern slavery, child- or forced labour, discrimination and harassment.

Prohibition of Child Labour

Suppliers shall strictly enforce the prevention of Child Labour practices within its supply chain. They shall not hire or otherwise allow work by any workers younger than 18 years of age, or the legal age as determined by the law and regulations of the location of the operations, whichever is higher. It is the duty of the Supplier to ensure full compliance with these specific restrictions.

Prohibition of Forced or Compulsory Labour/ Modern Day Slavery

Suppliers shall eliminate any practices of forced or compulsory labour from its operations and are expected to comply with all applicable laws. It must ensure that all its business dealings are free from situations which could be construed as forced or compulsory labour.

Non-Discrimination or Harassment

Suppliers shall ensure that their operations are free of discriminatory practices in hiring, employment terms, remuneration, access to training, promotion, termination or retirement procedures or decisions. On top of complying with all relevant laws and regulations, Suppliers shall ensure that their decisions are based on an individual's merit alone, disregarding an individual's socioeconomic background, including traits such as their gender, race, religion, political ideology, national origin, ancestry, citizenship, pregnancy status, disability and age, amongst others.

Furthermore, Suppliers shall take strong disciplinary actions against individuals or groups responsible for discriminatory practices such as harassment.

Safe Conditions

STTGDC expects its Suppliers to develop their own safety and risk management systems that are aligned with industry-recognised standards, such as the ISO45001 accredited standard, or equivalent. Suppliers shall also comply with all safety laws and regulations applicable to their locations of operations. In addition, where work involves any health or safety hazards (for example construction, fitout or operations of data centres) STTGDC requires compliance with its Health and Safety Group Minimum Standards (GMS) a copy of which is available to relevant Suppliers.

Workplaces shall be designed with employee well-being in mind and shall have safe working conditions in place to eliminate, as far as reasonably practicable, risks that may potentially lead to harm to people or the environment. Safe working conditions considerations include, but are not limited to providing adequate lighting, ventilation, cooling or heating where required, hygienic and accessible washing and sanitary facilities, organised and hazardous material-free workspaces, access to emergency equipment such as fire extinguishers and first aid kits, experienced safety coordinators, regular briefings, regular break times, and avenues for raising of concerns about safety.

Working Hours and Fair Recompense

Suppliers shall not assign more than the contractual hours stipulated with its employees other than for specific circumstances, or the maximum stipulated hours under local laws and regulations, whichever is lower.

These circumstances are defined to only during critical or emergency situations and shall not be a part of anticipated peak periods of a company's business cycle. If these circumstances occur, strict safety management protocols must be in place to ensure that the employee is physically and mentally able to work these hours and not be subject to the risk of fatigue.

Right to Associate and Enter Collective Bargaining Agreements

Suppliers must respect their employees right to associate and join trade unions. Whilst employees do not need to join these unions, they should be free and readily able to join them such that their views are represented with sufficient bargaining power. This is an essential practice to ensure that the employee's interests are well taken care of.

Employee Screening

Where requested by STTGDC or pursuant to contractually agreed terms between STTGDC and Suppliers, Suppliers are expected to comply with relevant background checks for its personnel.

Non usage of Conflict Minerals

STTGDC condemns the usage of Conflict Minerals. These are defined as minerals which are mined from war-torn areas suffering from armed conflicts such as civil wars, or where weak or non-existent governance structures exist to prevent systemic violations of human rights, and where these minerals financially support perpetrators of these crimes. Examples of such minerals include, tin, tantalum, tungsten and gold. Suppliers are expected to conduct their due diligence in determining the countries which their minerals are sourced from.

Environmental Protection

STTGDC aspires to be a leader in environmental sustainability and is in the process of greening its entire supply chain. All supply chain partners are expected to develop and implement industry-recognised environmental and energy and environmental management systems such as the ISO14001, ISO50001 accredited systems or equivalent. We expect our Suppliers to conduct their due diligence to determine environmental aspects associated with their work and activities and develop strategies to mitigate potential environmental impacts. STTGDC may also request the Supplier to disclose sustainability related data in order to promote greater collaboration in sustainability goals.

Where severe environmental degradation is observed as a result of an operation, we expect the Supplier to cease operations and take the relevant mitigation or substitution measures to ensure that such degradation is prevented. Suppliers must comply with all relevant environmental laws in their operations, which include water, waste, noise, air pollution and biodiversity protection laws.

Social Engagements

STTGDC expects its Suppliers to not engage in any activities that might jeopardise the socioeconomic stability and safety of the communities in which they operate. STTGDC encourages its Suppliers to engage in community development and inclusion works as responsible corporate citizens.

Supplier Diversity and Inclusion

STTGDC encourages fair and diverse workplaces through its procurement practices and expects its Suppliers to practice fair and robust hiring practices that hire people based on a merit basis that is independent of an employee's race or socioeconomic background. Suppliers in turn should also factor diversity and inclusion targets into their own procuring practices, intentionally supporting the development of more diverse sub-Suppliers.

Monitoring and Remedial Actions

Suppliers must ensure the full compliance of this CoC throughout their operations and through their own business dealings. Acceptance of this CoC by Suppliers authorises STTGDC to audit and conduct inspections in respect of their compliance with this CoC. STTGDC reserves the right to suspend agreements with Suppliers in the event of non-compliance with this CoC. Rectification by Supplier of any breaches of the CoC is expected to be implemented promptly and in any event within a reasonable time frame, as determined by STTGDC. However, should the breach be repeated or be reasonably severe, STTGDC may take appropriate actions including the termination of the relevant contract followed by applicable financial and legal repercussions for the liable Supplier.

Grievance Mechanisms

If the reader of this CoC should want to report any breaches of this CoC or other acts which occur in STTGDC's supply chain that jeopardise the integrity and fairness of our operations, you are welcome to use our whistleblowing avenues for the countries where we operate https://www.sttgdc.com/sg-en/about-us/esg

You are also welcomed to write in, to express your concerns. Your identity and all connections to you will be strictly held in confidence unless the law requires otherwise.

Please contact STTGDC through any of the following avenues:

1. Business Conduct Hotline: +65 6705 7192
2. Send an email to the Business Conduct team at sttgdc@rsmsingapore.sg
3. Send a letter to:
   RSM Risk Advisory Pte Ltd
   8 Wilkie Road, #03-08, Wilkie Edge,
   Singapore 228095
4. Send a fax to +65 6594 7985

For all correspondences, please address them with attention to: Tan Boon Yen, Senior Director, Internal Audit.