



E.S.T. ENGINEERING SHIP TECHNOLOGY PTE LTD
CODE OF CONDUCT



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INTRODUCTION

E.S.T. Engineering Ship Technology Pte Ltd was established in Singapore in 2010 by Italian Managers with more than 50 years of experience in Oil & Gas sector, Marine and the Industrial line.

As of today, E.S.T. has been well-known worldwide in countries like Saudi Arabia, United Arab Emirates (UAE), Asia and in Africa as well.

As an employee of E.S.T., we are expected to adhere to the standards prescribed in the Code of Conduct for our daily activities and when dealing with others.

Through this Code of Conduct, its sole intention is not to provide guidance for every difficult situation that we may face.

Its sole intention is nothing but to identify specific guiding principles to assist us in making the right decisions and at the same time, consistently aligned with E.S.T.'s core values.

CORE VALUES

E.S.T. core values are closely related to,

- Integrity
- Ethics
- Responsibility
- Teamwork
- Excellence

The breakdown for each of our core values are as such,

Integrity

To be honest in our work and instil respect towards private and confidentiality as we value loyalty and trustworthiness of our relationship with Customers, Clients, Employees and others. We aim to be a fair and honest partner for our suppliers.

Ethics

We ensure our employees are ethical and respectful with the people surrounding them no matter the difference in skin colour, language, culture and religion.

Responsibility

Every employee of E.S.T. are expected to be responsible in their work. Expected to admit when they have made mistakes and expected to be considerate and responsible in crafting a good image of the Company.

Teamwork

We are a close-knitted Company where the relationship within employees and the top Management are close. We believed that one who has more experience and knowledge should teach the others. We cultivate the teaching, learning and growing environment in our Company to achieve success.

Excellence

As of today, it is more towards the market and customer-oriented enterprise that dedicates any effort to meet the customer requirements, operational excellence expanding in international market with high commitment to serve its customers.

We aim to exceed customer expectations with timely delivery, quality reliability and efficiency in communications.

RESPONSIBILITIES OF EMPLOYEES & MANAGERS

Responsibilities of employees in E.S.T. should,

- Understand Company policies
- Expect to learn and adapt to the prescribed Code of Conduct
- Ask & approach Managers if there are any questions on the policies
- Should there be any questions and concerns on potential violation of policies, employees will have to bring it up promptly

Responsibilities of managers in E.S.T. should,

- Help to promote & lead compliance and ethics by example

- Making sure staffs understand the Code's standards & requirements
- To enforce the Code consistently
- Expected to support employees who might have questions about the policies

- To offer or receive any indecent / sexual gift that may tarnish the image and name of Company

One is *highly encouraged* to do the following,

- Reporting of any corruption-related offences/activities
- Obtaining an appropriate approval before proceeding/accepting any offering, personal gifts of high cost outside of the Company where E.S.T. has a business relation with
- To have a record list of any gifts and favours

CONDUCT IN BUSINESS MANAGEMENT & IN RELATIONS WITH PUBLIC INSTITUTIONS

E.S.T. Code of Ethic and our Professional Conduct covers a number of important factors. Important factors of guidelines such as,

Unprofessional Ethics

E.S.T. has a strong believe that one should not discriminate the other in terms of skin color, race, religion, cultural background, gender and many others. Discrimination is highly not allowed as we do not want any tension and bad relationship between employees, and/or Client, Customer and 3rd parties.

E.S.T. hire a decent number of employees of different diversity, to ensure a cohesion and harmonious relationship within the office personnel.

Bribery & Corruption

E.S.T. is strongly against the idea of bribery and corruption in any part of our work agreement and opportunities between employees, and/or Client, Customer and 3rd parties.

E.S.T. expect its employees to learn and understand on the policy of bribery. One is *not supposed* to do the following,

- Acceptance of suspicious request for payment that is unrelated to the transaction
- Making a payment that is not published on official price list
- Negotiating with government officials to secure any employment contracts
- To offer or receive any favour/gifts/entertainment as this may lead to a form of bribery

Local Laws

Everyone should be adhering to the existing laws implemented locally. This includes from the start of the tendering and bidding of projects, to the full spectrum of recruitment, to the payroll and invoicing and lastly to the after sales once the project has ended.

Should there be any dispute happening amongst our employees or between E.S.T. and our Clients/Customers, E.S.T. will try to resolve it peacefully.

Dispute and argument shall be referred to and finally resolved by arbitration in Singapore, in accordance with the Arbitration Rues of Singapore International Arbitration Centre (SIAC).

Relation with Client

E.S.T. strongly preserve its relationship with existing Clients and also potential Clients.

This relates to how we communicate, whether the Client agree with our Code of Conduct and Anti-Bribery standards or otherwise.

E.S.T. also consider the impact of any changes to how we operate and how these may / may not affect the relationship.

Confidential Information

Shall keep any Confidential Information supplied to it secret at all times and shall not disclose or deal with such Confidential Information nor permit the same to come into the possession or knowledge of

any party without the prior written consent of the party from whom it received such Confidential Information.

Confidential Information relating to any documents, materials or other information whether oral or in writing, in electronic form, on software, on microfiche, on tape or in or on any other form or medium (whether or not such information is expressly stated to be confidential or marked as such) relating to the business, customers, membership, services, internal procedures, finances or otherwise of either party hereto as may from time to time be advised, disclosed or supplied to others.

COMPANY POLICY

E.S.T. prohibit the availability and the usage of alcohol and of non-prescribed drugs by employees on its property or as part of any of its activities.

Any of the following actions constitutes a violation of the Policy and may subject an employee to disciplinary action including immediate termination,

- Using, selling, purchasing, transferring, possessing, manufacturing, or storing an illegal drug or attempting or assisting another to do so, while in the course of employment, on premises, in owned, leased, or rented vehicles, or on business.
- Working or reporting to work, conducting company business or being on premises or in a company-owned, leased or rented vehicle while under the influence of an illegal drug, alcohol or in an impaired condition

Preventive Acts will be as such,

- Employees taking drugs prescribed by an attending physician must advise their direct supervisor in writing of the possible effects of such medication regarding their job performance and physical/mental capabilities. This written information must be kept confidential and communicated to the direct supervisor prior to the employee commencing work. All medical information will be kept confidential and

the employer, without exception, will punish any breach of privacy and confidentiality in this regard.

- Any employee involved in a work-related accident where alcohol or drugs are believed to be a contributing factor will be referred to Operation Assistant in addition to any other accident investigation activities.

In support of this policy, E.S.T. Engineering Ship Technology Pte Ltd:

- Will notify each employee that as a condition of employment each must abide by the terms of this policy.
- Will make every good-faith effort to continue to maintain a drug and alcohol-free worksites through implementation of this policy.

This policy applies to all employees and as evidence of responsibility for the involvement of every employee in controlling the safe use of alcohol and drugs in the workplace

HSEQ – HEALTH, SAFETY, ENVIRONMENTAL & QUALITY POLICY

E.S.T. pays a serious attention when it comes to HSEQ as it involved safety and health related issues, environmental issues and quality as well.

We have existing policies related to the above-mentioned issues.

Workplace HSE Policy

E.S.T. goal is to prevent all workplace injuries and illnesses. Company will seek to achieve this by,

- Identifying and reducing risks of all types of work activities that may have the potential to produce personal injury
- Provide instructions and guidelines to improve one's understanding on workplace hazards
- Manage terror acts and to embrace local security movement (SG Secure)

All employees are expected to follow and understand the policy. To maintain clean and

orderly work desk. Report all injuries and work-related incident. Actively take part in safety improvement activities. Eliminate and minimize terror threats to our staff and public by ensuring control measures are taken into place.

Also, to promote strong safety programme that protects the health, safety and security of its staff, property and the public from any risk of harm.

In prior to Covid-19 pandemic, E.S.T. is fully equipped with the necessary safety measurements such as keeping our masks on, practise safe distancing within one person to another, maintaining proper and clean hygiene, keep track of temperature taking and contact tracing.

Relatable posters and reminders were being pasted around office premises, and also doing up health talk every now and then, to promote health & safety programme to E.S.T. employees.

Environmentally Friendly

E.S.T. is also concern on the environmental impacts these days. Hence, our Company take into account the type of waste we throw and such. Prepare recycle bins in the office premises.

Also, switching of electric switches and plugs if not in use. This able to reduce our electricity KPI.

Reducing of harmful emission of gases and reducing the usage of sulphur etc.