

## FINAL ASSESSMENT

### SINGAPORE TECHNOLOGIES ENGINEERING LTD

The following pages contain the detailed scoring for your company based on public information.

The following table represents a summary of your scores:

| Topic                                   | Number of questions | % score based on public information |
|---|---------------------|-------------------------------------|
| Leadership, Governance and Organisation | 10                  | 10%                                 |
| Risk Management                         | 7                   | 14.3%                               |
| Company Policy and Codes                | 12                  | 16.7%                               |
| Training                                | 5                   | 0%                                  |
| Personnel and Helplines                 | 7                   | 21.4%                               |
| <b>Total</b>                            | <b>41</b>           | <b>13.4%</b>                        |

**A1:**

**Does the company publish a statement from the Chief Executive Officer or the Chair of the Board supporting the ethics and anti-corruption agenda of the company?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company publishes a statement from the Chief Executive Officer or the Chair of the Board supporting the ethics and anti-corruption agenda of the company.

**References:**

Public:

TI notes:

ST Engineering Annual Report 2013

ST Engineering Annual Report 2012

<http://www.stengg.com/>

**A2:**

**Does the company's Chief Executive Officer or the Chair of the Board demonstrate a strong personal, external facing commitment to the ethics and anti-corruption agenda of the company?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company's Chief Executive Officer or the Chair of the Board demonstrate a strong personal, external facing commitment to the ethics and anti-corruption agenda of the company.

**References:**

Public:

TI notes:

ST Engineering Annual Report 2013

ST Engineering Annual Report 2012

<http://www.stengg.com/>

**A3:**

**Does the company's Chief Executive Officer demonstrate a strong personal, internal-facing commitment to the ethics and anti-corruption agenda of the company, actively promoting the ethics and anti-corruption agenda at all levels of the company structure?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company's Chief Executive Officer demonstrates a strong personal, internal-facing commitment to the ethics and anti-corruption agenda of the company, actively promoting the ethics and anti-corruption agenda at all levels of the company structure

**References:**

Public:  
TI notes:  
ST Engineering Annual Report 2013  
ST Engineering Annual Report 2012  
<http://www.stengg.com/>

**A4:**

**Does the company publish a statement of values or principles representing high standards of business conduct, including honesty, trust, transparency, openness, integrity and accountability?**

**Score:**

**1**

**Comments:**

Based on public information, there is evidence that the company publishes a statement of values representing high standards of business conduct, including honesty and integrity. However, it does not cover the range of values sought by the question, or go into sufficient depth by explaining what they mean by such values and why they matter to the organisation. The company therefore scores 1.

**References:**

Public:

Company website:

*'Integrity*

We believe the foundation of our business success rests on unyielding honesty, trustworthiness and responsibility for our actions, striving to do the right thing and to fulfill our promises to one another, our customers, partners and stakeholders.'

<http://www.stengg.com/about-us/what-drives-us>

Code of Conduct and Ethics:

'The anti-corruption policy provides guidance to employees to conduct our business legally, ethically and with integrity, wherever they are in the world.'

<http://www.stengg.com/sustainability/code-of-conduct-ethics>

**A5:**

**Does the company belong to one or more national or international initiatives that promote anti-corruption or business ethics with a significant focus on anti-corruption?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company belongs to one or more national or international initiatives that promote anti-corruption or business ethics with a significant focus on anti-corruption.

**References:**

Public:

TI notes:

ST Engineering Annual Report 2013

ST Engineering Annual Report 2012

<http://www.stengg.com/>

**A6:**

**Has the company appointed a Board committee or individual Board member with overall corporate responsibility for its ethics and anti-corruption agenda?**

**Score:**

**1**

**Comments:**

Based on public information, the company has appointed the Audit Committee and the Risk Review Committee with overall corporate responsibility for its ethics and anti-corruption agenda. However, it is unclear how this responsibility is shared between the two committees. The company therefore scores 1.

**References:**

Public:

Annual Report 2013:

'The Board, through the AC and the risk review Committee, is responsible for oversight of the risk management responsibilities, internal controls and governance processes delegated to Management. The IA supports the AC in reviewing the adequacy of the Company's internal control system. Staffed by qualified auditors, IA has unrestricted direct access to the AC. The Head of IA's primary line of reporting is to the Chairman of the AC, although she reports administratively to the president & CEO of the Company'.

'The AC has full authority to commission and review findings of internal investigations into matters where it is alerted of any suspected fraud or irregularity or failure of internal controls or infringement of any law likely to have a material impact on the Group's operating results'.

'The Audit Committee Chairman will be promptly notified of all fraud and suspected fraud cases received. The Audit Committee has the powers to take prompt actions to inquire into the concerns raised'.

<http://www.stengg.com/AR2013/download.html>

Annual Report 2013: Risk Management

'The FRM framework has been established to assist the group to manage its ethics and corruption risk. The Risk Review Committee has oversight of this framework that comprises the following elements to prevent, detect and respond to Fraud:

- (1) Promoting an Anti-Fraud Culture;
- (2) Periodic Assessment of the Risk of Fraud and implementing antifraud controls to prevent or detect fraud;
- (3) Investigating Fraud and taking Remediation Actions
- (4) Monitoring and Evaluating Effectiveness of the Anti Fraud measures.

Fraud within the FRM framework is used to describe a dishonest activity and comprises such acts as deception, theft, conflict of interest, as well as corruption and bribery.

The Group takes a zero tolerance attitude to matters relating to ethics or corruption. The above is espoused firmly in its set of core values and its Code of Conduct and Business Ethics.'

[http://www.stengg.com/AR2013/download/STE\\_AR\\_2013\\_Risk%20Management.pdf](http://www.stengg.com/AR2013/download/STE_AR_2013_Risk%20Management.pdf)



**A7:**

**Has the company appointed a person at a senior level within the company to have responsibility for implementing the company's ethics and anti-corruption agenda, and who has a direct reporting line to the Board?**

**Score:**

**0**

**Comments:**

Based on public information, it is unclear whether the company has appointed a senior person responsible for implementing the company's ethics and anti-corruption agenda. TI notes the existence of the IA but it is unclear whether this fulfils the role.

**References:**

Public:

TI notes:

Annual Report 2013:

'The Board, through the AC and the risk review Committee, is responsible for oversight of the risk management responsibilities, internal controls and governance processes delegated to Management. The IA supports the AC in reviewing the adequacy of the Company's internal control system. Staffed by qualified auditors, IA has unrestricted direct access to the AC. The Head of IA's primary line of reporting is to the Chairman of the AC, although she reports administratively to the president & CEO of the Company'.

'The AC has full authority to commission and review findings of internal investigations into matters where it is alerted of any suspected fraud or irregularity or failure of internal controls or infringement of any law likely to have a material impact on the Group's operating results'.

'The Audit Committee Chairman will be promptly notified of all fraud and suspected fraud cases received. The Audit Committee has the powers to take prompt actions to inquire into the concerns raised'.

<http://www.stengg.com/AR2013/download.html>

**A8:**

**Is there regular Board level monitoring and review of the performance of the company's ethics and anti-corruption agenda?**

**Score:**

**0**

**Comments:**

Based on public information, the Board reviews the group's top ten risks, of which adherence to anti-corruption legislation is a factor. However, TI does not assess this to be sufficient evidence of a review of the company's ethics and anti-corruption agenda. In addition, it is unclear how often this exercise is undertaken.

**References:**

Public:

TI notes:

Annual report 2013:

'During the year, the Board reviewed and revised the Group's top inherent risks:

Legal, regulatory and political: the Group, with its operations in several parts of the world, is subject to applicable laws and regulations of various jurisdictions. These laws and regulations include anti-corruption laws, aviation laws and regulations, export controls, safety and environmental regulations, anti-competition laws, etc. Failure by the Group to comply with these laws and regulations may result in criminal liabilities such as fines and penalties, and / or the suspension or debarment of the Group from government contracts. The Group has in place a framework that proactively identifies applicable laws and regulatory obligations, and embeds compliance into the day to day business processes.'

**A8(a):**

**Is there a formal, clear, written plan in place on which the review of the ethics and anti-corruption agenda by the Board or senior management is based, and evidence of improvement plans being implemented when issues are identified?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence to suggest the company has a formal, clear, written plan in place on which the review of the ethics and anti-corruption agenda by the Board or senior management is based.

**References:**

Public:

TI notes:

Annual report 2013:

‘During the year, the Board reviewed and revised the Group’s top inherent risks:

Legal, regulatory and political: the Group, with its operations in several parts of the world, is subject to applicable laws and regulations of various jurisdictions. These laws and regulations include anti-corruption laws, aviation laws and regulations, export controls, safety and environmental regulations, anti-competition laws, etc. Failure by the Group to comply with these laws and regulations may result in criminal liabilities such as fines and penalties, and / or the suspension or debarment of the Group from government contracts. The Group has in place a framework that proactively identifies applicable laws and regulatory obligations, and embeds compliance into the day to day business processes.’

‘During the year, IA worked with Management to align companies to the Group’s internal control environment and compliance standards in order to strengthen the self-regulating checks and balances. IA also made periodic visits to overseas subsidiaries to review their operations to ensure compliance with the internal controls framework’.

**A9:**

**Does the company have a formal process for review and where appropriate update its policies and practices in response to actual or alleged instances of corruption?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company has a formal process to review and update its policies and practices in response to actual or alleged instances of corruption.

**References:**

Public:

TI notes:

Annual Report 2013.

Company website: Code of Conduct and Ethics

<http://www.stengg.com/sustainability/code-of-conduct-ethics>

**A9(a):**

**Does the company have a formal anti-corruption risk assessment procedure implemented enterprise-wide?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence of a formal anti-corruption risk assessment procedure implemented enterprise-wide. The company has a risk profile which seems to include adherence to anti-corruption laws, but it is unclear whether this is implemented enterprise-wide.

**References:**

Public:

TI notes:

Annual report 2013:

'During the year, the Board reviewed and revised the Group's top inherent risks:

Legal, regulatory and political: the Group, with its operations in several parts of the world, is subject to applicable laws and regulations of various jurisdictions. These laws and regulations include anti-corruption laws, aviation laws and regulations, export controls, safety and environmental regulations, anti-competition laws, etc. Failure by the Group to comply with these laws and regulations may result in criminal liabilities such as fines and penalties, and / or the suspension or debarment of the Group from government contracts. The Group has in place a framework that proactively identifies applicable laws and regulatory obligations, and embeds compliance into the day to day business processes.'

**A10:**

**Does the company have a formal anti-corruption risk assessment procedure for assessing proposed business decisions, with clear requirements on the circumstances under which such a procedure should be applied?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company has a formal anti-corruption risk assessment procedure for assessing proposed business decisions, with clear requirements on the circumstances under which such a procedure should be applied.

**References:**

Public:  
NA

**A11:**

**Does the company conduct due diligence that minimises corruption risk when selecting or reappointing its agents?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company conducts due diligence that minimises corruption risk when selecting or reappointing its agents.

**References:**

Public:

TI notes:

Company website: Code of Conduct and Ethics

‘The Code applies to all employees in ST Engineering. Contractors, consultants and agents who are working on our behalf will be required to act consistently with the Code when acting on our behalf, and their undertakings to act consistently with the Code will be incorporated into their contracts with us.’

<http://www.stengg.com/sustainability/code-of-conduct-ethics>

**A12:**

**Does the company have contractual rights and processes for the behaviour, monitoring, control, and audit of agents with respect to countering corruption?**

**Score:**

**1**

**Comments:**

Based on public information, there is evidence that the company has contractual rights for the behaviour of agents with respect to countering corruption. However, it is not clear that the company has formal monitoring and audit procedures in place and that contracts are terminated if corrupt activities are found. The company therefore scores 1.

**References:**

Public:

Company website: Code of Conduct and Ethics

'The Code applies to all employees in ST Engineering. Contractors, consultants and agents who are working on our behalf will be required to act consistently with the Code when acting on our behalf, and their undertakings to act consistently with the Code will be incorporated into their contracts with us.'

<http://www.stengg.com/sustainability/code-of-conduct-ethics>



**A13:**

**Does the company make clear to contractors, sub-contractors, and suppliers, through policy and contractual terms, its stance on bribery and corruption and the consequences of breaches to this stance?**

**Score:**

**1**

**Comments:**

Based on public information, there is evidence that the company makes clear to contractors through policy and contractual terms, its stance on bribery and corruption. However, it is not clear that the consequences of non-compliance are made clear. The company therefore scores 1.

**References:**

Public:

Company website: Code of Conduct and Ethics

'The Code applies to all employees in ST Engineering. Contractors, consultants and agents who are working on our behalf will be required to act consistently with the Code when acting on our behalf, and their undertakings to act consistently with the Code will be incorporated into their contracts with us.'

<http://www.stengg.com/sustainability/code-of-conduct-ethics>

**A13(a):**

**Does the company explicitly address the corruption risks associated with offset contracting?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company explicitly addresses the corruption risks associated with offset contracting.

**References:**

Public:  
NA

**A13(b):**

**Does the company conduct due diligence that minimises corruption risk when selecting its offset partners and offset brokers?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company conducts due diligence that minimises corruption risk when selecting its offset partners and offset brokers.

**References:**

Public:  
NA

**A15:**

**Does the company have an anti-corruption policy that prohibits corruption in its various forms?**

**Score:**

**1**

**Comments:**

Based on public information, there is evidence that the company has an anti-corruption policy which seems to include terms on gifts and hospitality, conflicts of interest, bribery and political contributions. However, the full code of conduct is not publicly available and as such cannot be assessed. The company therefore scores 1.

**References:**

Public:

Company website: Code of Conduct and Ethics

'The Group operates internationally and employees operating anywhere in the world must be aware of and comply with all applicable anti-corruption laws, including local anti-corruption or anti-bribery laws. With its zero tolerance policy on corruption, ST Engineering expects every person within our Group to act consistently with the laws and our policies on anti-corruption. The anti-corruption policy provides guidance to employees to conduct our business legally, ethically and with integrity, wherever they are in the world.'

'Our Code sets out the guiding principles and desired behaviours that embody how our organisation and our people are expected to operate, and it embraces the business practices and standards of behaviour that support the commitment to honest and ethical business conduct.'

<http://www.stengg.com/sustainability/code-of-conduct-ethics>

**A16:**

**Is the anti-corruption policy explicitly one of zero tolerance?**

**Score:**

**2**

**Comments:**

Based on public information, there is evidence that the company has a zero tolerance anti-corruption policy.

**References:**

Public:

Company website: Code of Conduct and Ethics

‘With its zero tolerance policy on corruption, ST Engineering expects every person within our Group to act consistently with the laws and our policies on anti-corruption. The anti-corruption policy provides guidance to employees to conduct our business legally, ethically and with integrity, wherever they are in the world.’

<http://www.stengg.com/sustainability/code-of-conduct-ethics>

**A17:**

**Is the company's anti-corruption policy easily accessible to Board members, employees, contracted staff and any other organisations acting with or on behalf of the company?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company's Anti-Corruption policy is easily accessible to Board members, employees and third parties, as it is not publicly available.

**References:**

Public:  
TI notes:  
Company website.  
Code of Conduct and Ethics.  
Annual Report 2013.

**A17(a):**

**Is the company's anti-corruption policy easily understandable and clear to Board members, employees and third parties?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company's Anti-Corruption policy is easily understandable and clear to Board members, employees and third parties.

**References:**

Public:  
NA

**A18:**

**Does the anti-corruption policy explicitly apply to all employees and members of the Board?**

**Score:**

**1**

**Comments:**

Based on public information, the Code of Conduct and Ethics applies to all employees. However, there is no explicit mention of whether it applies to members of the Board. The company therefore scores 1.

**References:**

Public:

Company website: Code of Conduct and Ethics

'The Code applies to all employees in ST Engineering. Contractors, consultants and agents who are working on our behalf will be required to act consistently with the Code when acting on our behalf, and their undertakings to act consistently with the Code will be incorporated into their contracts with us.'



**A20:**

**Does the company have a policy on potential conflicts of interest, and does it apply to both employees and board members?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company has a policy on potential conflicts of interest. The company makes several references to conflicts of interest. However, these are assessed to be limited statements, it is not clear what applies to employees and directors, and the statements made do not define what would constitute a conflict of interest.

**References:**

Public:

Annual Report 2013:

‘FRS 112 Disclosure of Interests in Other Entities

FRS 112 Disclosure of Interests in Other Entities, which sets out the disclosures required to be made in respect of all forms of an entity’s interests in other entities, including subsidiaries, joint arrangements, associates and unconsolidated structured entities. The adoption of this standard would result in more extensive disclosures being made in the Group’s financial statements in respect of its interests in other entities; as FRS 112 is primarily a disclosure standard, there will be no financial impact on the results and financial position of the Company and Group when the Group adopts FRS 112 in 2014’

‘The ERCC met three times during the year. all decisions at any meeting of the ERCC are decided by a majority of votes of the ERCC members present and voting (the decision of the ERCC shall at all times exclude the vote, approval or recommendation of any member who has a conflict of interest in the subject matter under consideration’.

‘Fraud is used to describe a dishonest activity and comprises such acts as deception, theft, conflict of interest, corruption and bribery’.

**A21:**

**Does the company have a policy for the giving and receipt of gifts to ensure that such transactions are bona fide and not a subterfuge for bribery?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company has a policy for the giving and receipt of gifts, to ensure that such transactions are bona fide and not a subterfuge for bribery. The company's Code of Business Conduct and Ethics makes reference to gifts and hospitality, but this document is not public and therefore could not be assessed.

**References:**

Public:  
NA

**A22:**

**Does the company's anti-corruption policy include a statement on the giving and receipt of hospitality that ensures that such transactions are bona fide and not a subterfuge for bribery?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company has a policy for the giving and receipt of hospitality, to ensure that such transactions are bona fide and not a subterfuge for bribery. The company's Code of Business Conduct and Ethics makes reference to gifts and hospitality, but this document is not public and therefore could not be assessed.

**References:**

Public:  
NA

**A23:**

**Does the company have a policy that explicitly prohibits facilitation payments?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company has a policy that explicitly prohibits facilitation payments.

**References:**

Public:  
NA

**A24:**

**Does the company prohibit political contributions, or regulate such contributions in order to prevent undue influence or other corrupt intent?  
Does the company record and publicly disclose all political contributions?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company prohibits political contributions, or regulates such contributions in order to prevent undue influence or other corrupt intent. The company's Code of Business Conduct and Ethics makes reference to political contributions and donations, but as the document is not publicly available, it was not possible to assess the policy.

**References:**

Public:  
NA

**A25:**

**Does the company have a clear policy on engagement in lobbying activities, in order to prevent undue influence or other corrupt intent, and discloses the issues on which the company lobbies?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company has a clear policy on engagement in lobbying activities, in order to prevent undue influence or other corrupt intent, or discloses the issues on which it lobbies.

**References:**

Public:

NA

**A25(a):**

**Does the company prohibit charitable contributions, or regulate such contributions in order to prevent undue influence or other corrupt intent?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company prohibits charitable contributions, or regulates such contributions in order to prevent undue influence or other corrupt intent.

**References:**

Public:  
NA

**A26:**

**Does the company provide written guidance to help Board members and employees understand and implement the firm's ethics and anti-corruption agenda?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company provides written guidance to help Board members and employees understand and implement the firm's ethics and anti-corruption agenda.

**References:**

Public:  
NA



**A27:**

**Does the company have a training programme that explicitly covers anti-corruption?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company has a training programme that explicitly covers anti-corruption.

**References:**

Public  
NA

**A28:**

**Is anti-corruption training provided in all countries where the company operates or has company sites?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company provides training in all countries where the company operates or has company sites.

**References:**

Public:  
NA

**A29:**

**Does the company provide targeted anti-corruption training to members of the Board?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company provides anti-corruption training to members of the Board.

**References:**

Public:

TI notes:

Annual Report 2013:

'The Company Secretary attends all Board meetings and ensures that board procedures are followed. The Company Secretary advises the Board on governance matters including their timely disclosure obligations. She also assists with the co-ordination of continuing training for board members according to their needs, to keep up-to-date on corporate governance matters.'

**A30:**

**Does the company provide tailored ethics and anti-corruption training for employees in sensitive positions?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company provides tailored ethics and anti-corruption training for employees in sensitive positions.

**References:**

Public:  
NA

**A31:**

**Does the company have a clear and formal process by which employees declare conflicts of interest?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company has a clear and formal process by which employees declare conflicts of interest.

**References:**

Public:  
NA

**A32:**

**Is the company explicit in its commitment to apply disciplinary procedures to employees, Directors and Board members found to have engaged in corrupt activities?**

**Score:**

**1**

**Comments:**

Based on public information, there is evidence that employees who are found to be in violation of the Code of Business Conduct & Ethics may face disciplinary action. However, it is not clear whether this extends to members of the Board. Furthermore, the statement suggests that there may be exceptions. The company therefore scores 1.

**References:**

Public:

Company website: Code of Conduct and Ethics

'All employees are required to comply with the standards set out within this Code, as well as all policies and procedures. Violation of the standards in the Code, as in the violation of policies and procedures, may be subject to disciplinary action which may include termination of employment'.

**A33:**

**Does the company have multiple, well-publicised channels that are easily accessible and secure, to guarantee confidentiality or anonymity where requested by the employee (e.g. web, phone, in person), to report concerns or instances of suspected corrupt activity?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company has multiple, well-publicised channels that are easily accessible and secure, to guarantee confidentiality or anonymity where requested by the employee, to report concerns or instances of suspected corrupt activity. TI notes that the company has a Whistleblowing Framework but limited information is provided.

**References:**

Public:

TI notes:

Company website: Code of conduct and Ethics

‘Whistle Blowing Policy: We do not tolerate any malpractice, impropriety, statutory non-compliance or any wrong doing by board members, employees or suppliers in the course of their work. We are determined to foster and maintain an environment where board members, employees and outside parties, such as suppliers, customers, contractors and other stakeholders can report any wrong doing, in good faith, without the fear of retaliation. ST Engineering Audit Committee oversees the Group’s Whistle Blowing programme, investigation protocols and the appointment of independent investigators. Subject to applicable laws, identities of whistle-blowers are kept in strict confidence. Appropriate disciplinary actions may be taken against an employee who retaliates against a whistle-blower.’

Annual Report 2013:

‘The Company has in place a WhistleBlowing framework, where staff may, in confidence and

without fear of retaliation, raise concerns of incidents of possible wrongdoing or breach of applicable laws, regulations or policies to the respective chairmen of the RACs in the Group’.

‘Under the whistle-blowing policy, a process has been established for employees to raise a report of the above concerns, which can also be done on an anonymous basis. Subject to applicable laws, the identity of the employees who raise any such reports is kept in strict confidence and they are protected from any disciplinary or retaliatory action arising by reason of their having made these reports.’



**A33(a):**

**Are the whistleblowing channels available to all employees in all geographies?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company provides whistleblowing channels to all employees in all geographies.

**References:**

Public:

TI notes:

Annual Report 2013:

'The Company has in place a WhistleBlowing framework, where staff may, in confidence and without fear of retaliation, raise concerns of incidents of possible wrongdoing or breach of applicable laws, regulations or policies to the respective chairmen of the RACs in the Group.'

'Under the whistle-blowing policy, a process has been established for employees to raise a report of the above concerns, which can also be done on an anonymous basis. Subject to applicable laws, the identity of the employees who raise any such reports is kept in strict confidence and they are protected from any disciplinary or retaliatory action arising by reason of their having made these reports.'

**A33(b):**

**Does the company have formal and comprehensive mechanisms to assure itself that whistleblowing by employees is not deterred, and that whistleblowers are treated supportively?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company has formal and comprehensive mechanisms to ensure that whistleblowing by employees is not deterred, or that whistleblowers are treated supportively.

**References:**

Public:

NA

**A34:**

**Does the company have well-publicised resources available to all employees where help and advice can be sought on corruption-related issues?**

**Score:**

**0**

**Comments:**

Based on public information, there is no readily available evidence that the company has well-publicised resources available to all employees where help and advice can be sought on corruption-related issues.

**References:**

Public:  
NA

**A35:**

**Is there a commitment to non-retaliation for bona fide reporting of corruption?**

**Score:**

**2**

**Comments:**

Based on public information, there is evidence that the company has a non-retaliation policy and that disciplinary measures are applied to employees who breach it.

**References:**

Public:

Annual Report 2013:

‘Under the whistle-blowing policy, a process has been established for employees to raise a report of the above concerns, which can also be done on an anonymous basis. Subject to applicable laws, the identity of the employees who raise any such reports is kept in strict confidence and they are protected from any disciplinary or retaliatory action arising by reason of their having made these reports.’

Company website: Code of conduct and Ethics

‘Appropriate disciplinary actions may be taken against an employee who retaliates against a whistle-blower.’

<http://www.stengg.com/sustainability/code-of-conduct-ethics>

**Information Sources:**

**Company website:**

[www.stengg.com](http://www.stengg.com)

**ST Engineering Annual Report 2013:**

<http://www.stengg.com/AR2013/download.html>

**ST Engineering Annual Report 2012:**

<http://www.stengg.com/AR2012/download.html>