

## Securities Trading Policy

### 1. Introduction

The Company and directors and employees of the Group ("**Employees**") are prohibited from dealing in the Company's securities during the Prohibited Periods (as defined below) or when they are in possession of unpublished price-sensitive information of the Group.

Employees of the Group should not deal in the Company's securities on short-term considerations and should be mindful not to be involved in insider trading.

### 2. Prohibited Periods

The Company and Employees of the Group are prohibited from trading in the Company's securities during the 1 month before the announcement of the Company's first half year and second half year/ full year financial statements ("**Prohibition Periods**").

Employees will be notified of the Prohibited Periods or any changes by internal memorandum or other forms of communication circulated by the Finance Department.

In addition, the executive director(s) or the Board may declare other event specific prohibition periods for specific personnel. Employee who is aware of the existence of an event-specific prohibition period should not disclose the existence of such prohibition period to any other person.

### 4. Insider trading

Insider trading refers to the trading in the Company's securities by a person who (by virtue of his/ her connection with the Company or otherwise) is in possession of price-sensitive information concerning the Company which is not generally available to the investing public. Insider trading is prohibited by the law.

### 5. Disclosure of interests

Director and the CEO of the Company are required to notify the Company of his/ her dealings in the securities of the Company or a related corporation of the Company **within 2 business days** under Section 133 of the Securities and Futures Act of Singapore ("**SFA**").

A substantial shareholder of the Company (being a shareholder holding 5% or more of the Company's voting shares) is required to notify the Company of his/ her interest and dealings in the Company's voting shares **within 2 business days** under Sections 82, 83 and 84 of the Companies Act and Sections 135, 136 and 137 of the SFA.

### 7. Deemed dealings

Dealings by the following persons shall be deemed to be the dealings of the director or employee:

- (i) spouse or any child (below 21 years of age) of the director or employee;
- (ii) a company in which the director or employee and his/ her associates control 20% or more of the company's voting shares; and
- (iii) a trust of which the director or employee is a beneficiary.