



Singapore College
of Insurance

Anti-Bribery and Anti-Corruption Policy

Policy Reference & Approval Date	POL-RC-SCI03 21 November 2025
-------------------------------------	----------------------------------

Document Version Control

Version Number	Date	Description of Change	Approved By
1.0	13 May 2022	Inception	CEO
1.1	21 November 2025	Update of document to current	CEO

1. Introduction

- 1.1 SCI is committed to conduct our businesses and operations in an honest and ethical manner.
- 1.2 SCI adopts a zero-tolerance approach to bribery and corruption and is committed to acting professionally, transparently, and fairly with integrity in all our business dealings and relationships as well as implementing and enforcing effective systems to counter bribery and corruption.
- 1.3 This Anti-Bribery and Corruption Policy sets out SCI's policies and guiding principles to conduct our businesses with honesty, fairness, and high ethical standards. It sets out the minimum standard that must be followed. Where local laws, regulations or rules impose a higher standard, that higher standard must be followed.
- 1.4 This Policy applies to all employees (full and part-time), contract workers, consultants and Self-Employed Persons (SEPs) of SCI.

2. General Principles

2.1 What is prohibited?

SCI's employees may not, directly or indirectly, (i) offer, (ii) promise, (iii) agree to pay, (iv) authorise payment of, (v) pay, (vi) give, (vii) accept, or (viii) solicit Anything of Value to or from any third party in order to secure or reward an improper benefit or improper performance of a function, activity or to procure an unfair business advantage.

SCI's employees should also avoid any conduct that creates even the appearance of improper activity or conduct.

2.2 What type of conduct is prohibited?

Any act prohibited under Section 2.1 does not actually have to take place. We should avoid any conduct that creates even the appearance of improper activity or conduct.

2.3 What are the consequences of violations?

Violations can have severe consequences for SCI and the individual involved and can attract both criminal and civil penalties.

3. Anti-Bribery and Anti-Corruption Laws

3.1 Applicable Laws

SCI will uphold all laws relevant to counter bribery and corruption in all the jurisdictions in which we operate.

For our businesses and operations in Singapore, we are bound to observe all relevant and applicable laws which include but are not limited to the Prevention of Corruption Act of Singapore, the Penal Code and the Corruption, Drug Trafficking and Other Serious Crimes (Confiscation of Benefits) Act which may be relevant to the corrupt receipt of gifts and hospitality.

4. Gifts and Entertainment

4.1 Business Courtesies

SCI recognises that the exchange of business courtesies, such as modest gifts, and entertainment (including meals, invitations to attend promotional events or parties) particularly during festive periods is customary and legitimate to create goodwill, and/or strengthen business and commercial relationships. Such courtesies are allowed if they are not lavish.

4.2 Reasonable Gifts and Entertainment

SCI's employees should refer to SCI's Gifts and Entertainment Policy for details.

5. Training and Compliance

5.1 Anti-Bribery and Anti-Corruption (ABAC) Training

SCI will provide employees with regular ABAC compliance training programmes to educate them about compliance with anti-corruption laws and this Policy. Records on attendance/completion records will be maintained to verify that all applicable SCI's employees receive the necessary training, whether online or facilitator-led training.

5.2 Acknowledgement of ABAC Training Received

As part of SCI's ongoing compliance commitment, all SCI's employees must read and acknowledge to confirm that they have understood this Policy. All SCI's employees must acknowledge in writing using the **Anti-Bribery and Anti-Corruption Policy Compliance Acknowledgement Form (Appendix A)**. Each SCI employee is required to complete this aforesaid form upon joining SCI, as well as following each update being made to this Policy, and as otherwise required.

5.3 Consequences of Violations

Violations can have severe consequences for SCI and the individual involved, and can attract both criminal and civil penalties.

As an example, under the Prevention of Corruption Act of Singapore, a conviction for a corruption offence is punishable by fines of up to S\$100,000 or an imprisonment term of up to seven years or both. In addition, if SCI is found to have taken part in corrupt activities, this will have severe repercussions and damage to both SCI's reputation and financial performance.

SCI's employees (full and part-time), contract workers, consultants and SEPs who do not comply with this Policy might be reported to the relevant authorities, as well as be subjected to disciplinary actions, which can include termination of employment/services.

5.4 Reporting of Violations

SCI's employees (full and part-time), contract workers, consultants and SEPs can report any known or suspected violation using SCI's whistleblowing channel. Refer to SCI's **Whistleblowing Policy**.

SCI employees who fail to report any known or suspected violations may also be subjected to disciplinary actions, which can include termination of employment.

6. Assistance

If any SCI employee has any questions relating to this Policy or the propriety of the conduct or manner of any staff handling any transaction, he or she should consult the Head of Risk and Compliance.

Appendix A



Singapore College
of Insurance

Anti-Bribery and Anti-Corruption Policy Compliance Acknowledgement Form

As an SCI's employee (full and part-time), or Contract Worker, Consultant, Self-Employed Persons (SEPs) engaged by SCI, you are required to read and understand our Anti-Bribery and Anti-Corruption Policy and acknowledge that you have done so and will comply with it. Upon signing, this Acknowledgement Form shall be submitted to and retained by SCI's Human Resources Department.

Please check the appropriate boxes below:

- I acknowledge that I have read and understood SCI's Anti-Bribery and Anti-Corruption Policy.
- I confirm that I will comply with SCI's Anti-Bribery and Anti-Corruption Policy throughout my employment/relationship with SCI.
- I confirm that I will report any known or suspected violations of SCI's Anti-Bribery and Anti-Corruption Policy or anti-corruption laws to SCI.
- I confirm that I understand that a violation of SCI's Anti-Bribery and Anti-Corruption Policy could result in disciplinary measures up to and including termination of employment/services.

Name:	
For SCI Employee/Contract Worker Please state your Designation and Department:	
For Consultants/SEPs engaged by SCI Please state your nature of work with SCI: (e.g. Accounts Consulting/ Corporate Secretariat Services, etc.)	
Signature & Date:	