



## COMPLIANCE POLICY

**"Whoever is careless with the truth in small matters cannot be trusted with important matters." – Albert Einstein**



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Member Of  
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## **SIR COMPLIANCE POLICY ON AN-TI BRIBERY & CORRUPTION, DATA PROTECTION & ANTI - TRUST**

This group policy statement applies globally to all SIR entities. Compliance with the statement is required by all employees, joint venture companies, subsidiaries, business partners, suppliers and third parties who undertake work for or on behalf of SIR Move.

### **POLICY STATEMENT**

It is our policy to conduct our business in an honest and ethical manner. SIR Move takes a zero-tolerance approach to bribery, corruption and other forms of financial crime. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, and implementing and enforcing effective systems to counter bribery, wherever we operate. All information collected and used on behalf are with approvals of our customers and are protected in accordance with the PDPA Act. SIR supports free and fair trade to protect our customers/clients. We adhere and abide by the applicable laws and regulations in which we operate.

#### **SIR Move is committed to ensuring that our corporate conduct:**

- Is professional, open and fair
- Maintains high levels of integrity throughout our operation
- Is in the best interests of our clients
- Respects confidentiality
- Complies with our own procedures of operation
- Complies with all applicable laws, rules and regulations
- Encourages the reporting of any malpractice
- Identifies and deals with any potential conflicts of interest

#### **Employees and any other persons working for or on behalf of SIR Move must:**

- Act with integrity at all times
- Never put their own gain above the welfare of clients and fellow employees
- Respect confidentiality at all times
- Be honest, open and transparent in their dealings
- Avoid conflicts of interest and any actions or situations that are inconsistent with professional obligations
- Act in accordance with the ethical standards of any professional bodies of which they are a member
- Be accountable for their actions
- Undertake their work with due skill, care and diligence
- Give fair, neutral advice
- Never discriminate against others
- Set a good example of ethical business conduct
- Report any instances of wrongdoing or malpractice through the mechanisms provided by the company



SIR Management has overall responsibility for ensuring that this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Director of Operations is primarily responsible for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring that those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

## **SIR MOVE SERVICES ANTI- BRIBERY & CORRUPTION POLICY**

### **The Prevention of Corruption Act (Singapore)**

The Prevention of Corruption Act makes it a crime for any person, by himself or together with any other person, to corruptly give, promise or offer to any person any gratification as an inducement to or reward for any person doing or forbearing to do anything in respect of any matter or transaction whatsoever, actual or proposed. The Act specifically prohibits such payments, promises or offers to any member, officer or servant of a public body.

The Prevention of Corruption Act also makes it a crime for any person, by himself or in conjunction with any other person, to corruptly solicit or receive, or agree to receive for himself or for any other person, any gratification as an inducement to or reward for any person doing or forbearing to do anything in respect of any matter or transaction, actual or proposed. These prohibitions explicitly apply to actions by agents. The punishment for such offences includes a fine not exceeding \$100,000 or imprisonment for a term not exceeding 5 years or to both.

## **DATA PROTECTION POLICY**

**The Personal Data Protection Act ("PDPA")** took effect from 2 July 2014, governing the collection, use, disclosure and care of personal data.

We value the importance of your personal data privacy and are committed to protect your information. Usage and disclosure of data/s are for the purposes defined.

Information and or any attachments containing personal data are confidential and intended for addressee only. Reading, copying, disclosure or use by anybody else is not authorized.

Any unauthorized use of the personal data in whole or part is prohibited and Failure to comply may be fined up to \$1 million. More details and full act <https://sso.agc.gov.sg/Act/PDPA2012>

## **ANTI-TRUST/THE COMPETITION ACT 2004**

Officially known as The Competition Act 2004, the law has been effective since July 1, 2007 and promotes efficient markets in Singapore. The Act prevents unfair trade practices and restricts the formation of cartels and monopoly activity in trade. Modelled after the UK Competition Act 1998, the law is administered and enforced by Competition Commission of Singapore (CCS), a statutory body that investigates and adjudicates instances of violations of the Act by market participants. CCS also has powers to impose sanctions that include (a) financial penalties, (b) enforcing errant companies to make structural changes, (c) requiring termination of any agreement or conduct that CCS deems will harm competition.