

TRADE COMPLIANCE POLICY STATEMENT

Issued by: Gladys Pea Harjantho, HR Director

Issued To: All Smart Energy Pte Ltd employees, contractors, suppliers and visitors

Issue Date: 1st January 2021

Smart Energy Pte Ltd is 100% committed to comply with the Strategic Goods Control Act (SGCA) and its applicable regulations and other related domestic legislations.

Smart Energy understands that a permit is required prior to any export, re-export, transshipment, transit, intangible transfer of technology of strategic goods* and strategic goods technology in the Strategic Goods Control List and under "catch-all" provision where all goods and technology intended or likely to be used for weapons of mass destruction purposes are subject to controls. The list of strategic and goods handled by Smart Energy is available to all staff and all staff are required to know their role with respect to compliance with the SGCA and Customs Act.

Smart Energy has taken steps to ensure that the company:

- Implement an internal compliance programme as outlined in the Strategic Trade Scheme Handbook to ensure compliance with the Strategic Goods (Control) Act (SGCA) and its subsidiary legislations
- Products shall only be transferred to legitimate and approved customers and end-users
- Obtain the necessary approvals from the relevant Competent Authorities (for example, the movement and storage of controlled goods, including Dangerous Goods)
- Provide assistance to Singapore Customs, including but not limited to manpower and system access for the purpose of any investigation, periodic audit, stock check and supervision operation conducted by Singapore Customs
- Comply with permit / licensing / registration conditions and rules under the Customs Act, Customs Regulations, GST Act, GST (General) Regulations and the licensing Terms & Conditions

Any questions or clarifications should be directed to the Customs Singapore Accounts Manager assigned to Smart Energy via in advance of any potential violation of the SGCA.

Special care should be taken by every staff member to prevent transactions or dealings with countries or entities involved in the proliferation of nuclear, chemical or biological weapons or missiles delivering these weapons.

Any individual found to have deliberately disregarded the SGCA may have their employment terminated without notice and may be charged by the Singapore Government. Penalties include seizure and forfeiture of goods, fines and/or imprisonment.

For more information go to www.customs.gov.sg or please contact management with any questions.

It is everybody's responsibility to ensure that Smart Energy Pte Ltd complies with the SGCA. Please seek further information and training if you are unsure of your role/responsibilities. Any individual found to have deliberately disregarded the SGCA may have their employment terminated without notice.

Thank you.

Warm Regards,
Gladys Pea Harjantho
HR Director

* Strategic goods refer to goods and technology that meet the technical specifications described in the Strategic Goods Control List. These include conventional arms, military equipment and goods relating to the development, production and use of nuclear, chemical and biological weapons, as well as certain "dual-use" goods that are high technology items with both civilian and sensitive military applications.