

## 1. Anti-Bribery Policy

### Introduction and Zero Tolerance Approach

- 1 Integrity is a core value of the Singapore Public Service and the Land Transport Authority ("LTA" or the "Authority"). We uphold a zero-tolerance stance towards all forms and acts of corruption, including Bribery. We are fully committed to conducting our businesses and operations in an honest and ethical manner, by maintaining the highest standards of fairness, openness, transparency, and accountability in the conduct of all LTA officers.
- 2 This Anti-Bribery policy ("This Policy") sets out LTA's rules in conducting our businesses and operations and represents the minimum standard that must be strictly adhered to. Where local laws, regulations or rules impose a higher standard, that higher standard shall apply.
- 3 This Policy shall be read in conjunction with other related policies, such as the Employee Handbook and the Code of Conduct for LTA's procurement: Suppliers' Guide. In the event of any inconsistency or conflict between this Policy and other LTA policies, this Policy shall prevail.
- 4 The Authority requires LTA officers to ensure there is no conflict of interest between their official duties and personal interests, to be fair and impartial in carrying out their responsibilities, and to refrain from engaging in corruption or any behaviour that could be perceived as such.

### Laws and Regulations

- 5 All LTA officers, board of directors, our suppliers, contractors, and other business associates shall be compliant with the Singapore Prevention of Corruption Act 1960 (PCA) and other applicable Anti-Bribery and corruption laws, including sections 161 to 165 of the Penal Code 1871.

### Compliance

- 6 **"Bribery"** is the act of offering, promising, giving, accepting, or soliciting any gratification, whether directly or indirectly, in order to secure or induce an improper or unfair advantage.
- 7 **"Gratification"** can be monetary or non-monetary in nature, including:
  - (a) Money, gifts, loans, fees, rewards, commissions, or other property, whether movable or immovable;
  - (b) any office, employment or contract;
  - (c) any payment, release, discharge or liquidation of any loan, obligation or liability;
  - (d) any other service, favour, or advantage; and
  - (e) any offer, undertaking or promise of any gratification within the meaning of subparagraphs (a) to (d) above.
- 8 The Authority:
  - (a) prohibits all LTA officers from soliciting or accepting any kind of benefits such as cash, gifts, discounts, services, favours, or advantage from any individual or

organisation that they deal with in the course of their employment. There are procedures requiring declaration of gifts that are received which cannot be declined because of protocol, courtesy or unforeseen circumstances;

- (b) prohibits all LTA officers from providing or offering any benefits such as cash, in kinds, services, favours or advantage to any individual or organisation that they deal with in the course of their employment, unless with prior approval;
- (c) requires all LTA officers to declare any conflict of interest, private investments in shares, ownership in companies or business or land or house that will affect their ability to conduct their official duties impartially;
- (d) requires all LTA officers to abstain from participating in decision-making on issues which they have or are deemed to have a personal interest in;
- (e) requires all LTA officers to refrain from benefiting or be deemed as benefiting from sensitive information that they come across during their official duties;
- (f) requires all LTA officers to steer clear from being heavily indebted, which may inevitably create pressures to solicit or accept bribes. There are clear procedures requiring declarations of casino visits and from those who are heavily indebted;
- (g) requires all LTA officers to refrain from participating in any outside activities that are extended to them in their capacity as LTA employee, director, or officer, without prior approval; and

- (h) prohibits any practice that might conceal or facilitate any corrupt acts. All records and financial transactions should be accurate, complete, recorded timely and available for review.

### **Reporting and Consequences of Violation**

- 9 The Authority has established an internal reporting structure, procedures and whistleblowing channels that are secure and accessible to all LTA officers and external parties to raise concerns and report alleged fraudulent act(s) and/or improper conduct without fear of reprisal. Any victimisation or harassment of the whistle-blower will not be tolerated.
- 10 All alleged corruption cases, including Bribery, will be referred to the Corrupt Practices Investigation Bureau (CPIB). Any LTA officers who are established to have been involved in any acts of corruption, including Bribery, will be subjected to disciplinary actions, including termination of employment.

### **Our Subsidiaries**

- 11 The Authority requires all its subsidiaries to similarly adopt a zero-tolerance policy towards corruption, implement the rules mandated by this Policy, and maintain a robust internal control system in preventing, detecting, and responding to any corrupt or improper practices.

### **Working with Third Parties**

- 12 The Authority strives to ensure that our suppliers, contractors, and other business associates share our zero-tolerance policy against corruption, including Bribery. The Authority will not engage in business dealings

with those known or are reasonably suspected to be engaged in corruption, including Bribery.

### **Anti-Bribery Management System**

- 13 The Authority has established an Anti-Bribery Management System (ABMS) in line with the ISO 37001:2016 Standard to prevent, detect and respond to its Bribery risks, with the Audit Committee as the Governing Body of the ABMS. The Authority is committed to satisfying the requirements of its ABMS and the ISO Standard.
- 14 The Authority is committed to the continual improvement of the ABMS in ensuring that it remains relevant and effective in achieving the Authority's Anti-Bribery objectives.
- 15 The Authority has established an Anti-Bribery Compliance Function (ABCF) to oversee the design, implementation, and continual improvement of the ABMS, and to champion Anti-Bribery culture throughout LTA, with support from all LTA staff. The ABCF serves as a second line of defence within the ABMS governance structure. The ABCF has direct line of communication and prompt access to the governing body and top management to raise any issues or concerns in relation to Bribery or the ABMS.

### **Policy Review and Approving Authority**

- 16 This Policy will be regularly reviewed and updated as needed to ensure it continues to be adequate and effective.
- 17 Any deviation from the Policy or subsequent changes shall be approved by the Audit Committee.