



Code of Conduct & Anti-Bribery Policy

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1. Introduction

1.1 Brief History of TMO Manufacturing

TMO Manufacturing began operations in 1992 as a small precision machining company. Today, we specialize in precision Computer Numerical Control (CNC) machined parts out of a wide range of materials.

Over the years TMO have established successful businesses with multinational customers especially in the growing field of medical, biosciences and life sciences. TMO is known as reliable and cost-effective supplier with the flexibility and determination to meet challenging objectives.

1.2 Vision and Mission

Vision: To continuously improve in quality, delivery, and cost.

Mission: To provide quality products and services, delivered on time, at a competitive price.

1.3 Scope

This document outlines the ethical standards that guide all TMO Manufacturing employees, contractors, and representatives. It applies to all individuals conducting business on behalf of TMO Manufacturing, including full-time employees, part-time workers, temporary staff, consultants, and third-party vendors.

Our commitment to responsible, transparent, and law-abiding operations is essential to earning and retaining the trust of our partners.

2. Code of Ethics and Professional Conduct

2.1 Ethical Principles

- **Integrity and Compliance:** We conduct business ethically and in accordance with relevant laws, including anti-bribery and anti-corruption regulations.
- **Respect and Fair Dealing:** Employees and representatives must deal fairly with customers, suppliers, vendors, and colleagues, avoiding manipulation, misrepresentation, or unethical practices.
- **Confidentiality:** Proprietary or otherwise sensitive information (including trade secrets and client data) must not be used for personal gain or disclosed without authorization.

2.2 Authorized and Prohibited Activities

- **Complying with Laws and Policies**

All employees and representatives must follow applicable laws, regulations, and company guidelines. Illegal or unauthorized activities—such as the use or distribution of illicit substances—are strictly prohibited on company property or during work hours.

- **Fair Workplace Conduct**

Any form of discrimination, bullying, or harassment is not tolerated. We embrace diversity, equity, and inclusion, selecting and rewarding employees based on merit and ability, and providing a respectful environment for all.

3. Anti-Bribery and Corruption

TMO Manufacturing enforces a **zero-tolerance** policy toward bribery and corruption. We prohibit offering, soliciting, or accepting bribes in any form—monetary or otherwise—to gain improper advantages.

3.1 Definition of Bribes

Bribes may include but are not limited to:

- Money, gifts, loans, fees, rewards, or commissions
- Any office, employment, or contract awarded improperly
- Payment or discharge of a loan or liability
- Services, favours, or other advantages (e.g., travel upgrades)
- Any promise or offer of future gratification

3.2 Gift Policy

- **Accepting Gifts:** If a third party offers a gift that could be seen as an attempt to influence business decisions, employees must politely decline. If returning the gift is impractical (e.g., perishable items), they must declare it to senior management for further guidance.
- **Inappropriate Gifts:** Cash, gift certificates, stocks, or any item of high value from existing or potential vendors/customers are considered inappropriate. Employees are obliged to notify management if they encounter such offers.

3.3 Reporting Impropriety

- **Whistleblowing:** Employees, contractors, and other stakeholders may raise concerns about fraud, bribery, or other improper activities directly with senior management.
 - **Investigation:** We promptly investigate all credible reports. Employees found to have violated our anti-bribery rules are subject to disciplinary action, including potential termination of employment.
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4. Diversity, Equity, and Inclusion

- TMO Manufacturing is committed to a workplace culture that values and respects individual differences. We adhere to **Tripartite Guidelines on Fair Employment Practices** in Singapore, ensuring that recruitment, promotion, and compensation decisions are made based on merit, without discrimination based on age, race, gender, religion, marital status, or other protected characteristics.
 - We will not tolerate harassment or hostile behaviour of any kind. Employees should remain culturally sensitive, tolerant, and respectful toward co-workers, customers, vendors, and contractors.
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5. Policy Administration and Updates

5.1 Enforcement and Consequences

TMO Manufacturing takes violations of this policy seriously. Employees or representatives found engaging in unethical behaviour, bribery, or any other prohibited conduct will face disciplinary action, which may include termination of employment, legal consequences, and/or reporting to relevant authorities.

Contractors and vendors who violate these standards may have their agreements terminated and be disqualified from future business dealings with TMO Manufacturing.

5.2 Reporting Violations (Whistleblowing)

Employees, contractors, and third parties are encouraged to report suspected violations of this policy, including unethical conduct, bribery, or any other form of misconduct. Reports can be made confidentially via:

Email: tmo.admin@tmomfg.com.sg

TMO Manufacturing strictly prohibits retaliation against individuals who report concerns in good faith. All reports will be investigated promptly, and appropriate actions will be taken to address violations.

5.3 Policy Updates

This policy is reviewed annually and may be updated to reflect changes in laws, regulations, or business practices. Employees and relevant stakeholders will be notified of any significant revisions.