



Unique Group
Strength in Depth

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TRADE COMPLIANCE POLICY STATEMENT

Issued By: Steve MacMillan, Regional Vice President - APAC
Issued To: All Staff at Unique System (SEA) Pte Ltd
Issue Date: 1st August 2017

Unique System is 100% committed to complying with the Strategic Goods (Control) Act (SGCA) and the Strategic Goods (Control) Regulations (SGCR) when exporting Dual Use Goods.

Unique System understand 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.

Unique System has taken time to develop and implement an effective Internal (Export Control) Compliance Program (ICP) and will ensure that resources are available and prioritised for ensuring the ongoing effectiveness and management of this program. The ICP covers the entire supply chain used by Unique System.

The list of dual use goods handled by Unique System is available to all staff and all staff are required to know their role with respect to compliance with the SGCA and SGCR.

Any questions or clarifications should be directed to the SGC Officer in advance of any potential violation of either the SGCA or SGCR.

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 or SGCR may have their employment terminated without notice and may be charged by the Singapore Government as below,

Transfer of strategic goods without a valid strategic goods permit:

- a fine not exceeding S\$100,000 or 3 times the value of the goods or technology involved, whichever is greater, or imprisonment not exceeding 2 years, or both, on the first conviction; or
- a fine not exceeding S\$200,000 or 4 times the value of the goods or technology involved, whichever is greater, or imprisonment not exceeding 3 years, or both, on a second or subsequent convictions.

Breach of condition of permit or registration:

- a fine not exceeding S\$500,000 or imprisonment not exceeding 12 months, or both

For more information go to www.customs.gov.sg or please contact the SGC Officer with any questions or to organise further training.

It is everybody's responsibility to ensure that Unique System (SEA) Pte Ltd complies with the SGCA and SGCR.

**If you are unsure of your responsibilities, you must seek further information and training.
Any individual found to have deliberately disregarded the SGCA or SGCR may have their employment terminated without notice.**

Steve MacMillan
Regional Vice President - APAC

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