# Group Business Ethics Code & Guidance

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# Table of Contents

# A Message from Group CEO, Singlife

The Singlife Business Ethics Code sets out the standards of behaviour expected from all of us in our working lives. It is a guiding light for everyone in Singlife, helping us to make the right decisions every day.

The Business Ethics Code is based on our manifesto of always finding a Better Way to do things and three of our five core values – Collaboration, Empathy and Trust. (The five values are Agility, Collaboration, Empathy, Innovation and Trust)

These values form the moral compass that help us to think about how to apply the right behaviours in all we do. We have to work together to show kindness and build trust. This ensures that we sustain a strong ethical and inclusive culture at Singlife.

We should always keep the Singlife values front of mind and where a scenario we face at work is not covered in this Code, exercise our own good judgement in making the right decisions.

Pearlyn Phau
Group CEO
Singlife

# Singlife Group Statements of Business Ethics Principles

We live our call to action **"Better starts with us"** when we

**(1)** **We conduct ourselves with the highest standards of corporate ethics, integrity and honesty.** This means we conduct ourselves in such a manner that will ensure we build long term, trusting and sustainable relationships with our customers, business partners, regulators, employees and suppliers.

**(2)** **We will comply with all relevant laws & regulations.** This means we take all our regulatory obligations seriously and will make every effort to adhere strictly to the requirements, not merely by the letter but also by the spirit.

**(3)** **We reject all forms of financial crime.** This means we will take all reasonable efforts to proactively help protect our customers, shareholders and employees from financial crime. These include internal & external fraud; money laundering & terrorist financing; bribery & corruption; tax evasion; compliance with sanctions laws; and market abuse.

**(4)** **We conduct business in a fair manner.** This means we have a zero-tolerance policy for bribery and corruption and knowingly offering an unfair advantage to any person in our business dealings. Also, we will always comply with the terms of business agreed with our customers, distributors and suppliers.

**(5)** **We practice fair dealings and achieve good customer outcomes**. This means our customers' interest is always at the heart of our business and drives our decision-making process. This is evident from the design of our products which are suitable for their financial needs; the quality of financial advice; the clarity of product information; our communication approach; and the manner in which we address their queries and complaints.

**(6)** **We respect the confidentiality of information and uphold competition laws.** This means our directors and employees do not share or seek to receive any confidential and/or commercially sensitive information with 3rd parties in breach of the principle of fair and clean competition.

**(7)** **We protect personal data rigorously.** This means we will continuously strengthen our cyber defence and control processes to ensure that our customers have the peace of mind that their personal information is safe with us

**(8)** **We will report accurately and honestly.** This means we will make every effort to ensure we report accurate information and present them fairly in the discharge of our reporting or disclosure obligations to all stakeholders.

**(9)** **We treat our people with care and compassion.** This means we respect every individual, appreciate diversity and inclusiveness, and make efforts to ensure the wellbeing of our colleagues.

**(10) We care for our community and our environment.** This means we will play our part to contribute to society through our community programs, and endeavor to reduce our carbon emission, energy usages and wastages through our ESG strategy.

# Business Ethics Code Guidance

## 1. Introduction

As Singlife employees, we are expected to meet the highest standards of business conduct and to manage and conduct our business according to rigorous ethical, professional and legal standards.

The standards set in this Code apply to all Singlife operations and we expect at least equivalent standards from our business partners.

The Business Ethics Code Guidance applies to all the Group's business dealings. It is not intended to be an exhaustive guide to rules and regulations. Rather, its purpose is to provide a common understanding of the Group's ethical standards and to promote operation in accordance with these standards.

The principles and standards set out in the Code are fundamental to Singlife. Failure to comply with the Code may result in dismissal or other disciplinary action.

## 2. Applying The Ethics Code

### 2.1 What is the scope for this ethics code?

The Singlife Group business ethics code applies to all directors, employees, officers, agents, suppliers, advisers and consultants across the group.

Every employee must submit an explicit annual declaration that they have read the ethics code and agree to comply with the principles.

The responsibility for compliance with this ethics code rests with each individual. Managers at all levels are expected to foster the highest standard of ethical conduct and ensure adherence to the Group policies and standards.

### 2.2 What does it mean for Singlife employees?

It is important that we live by our values of Agility, Collaboration, Empathy, Innovation and Trust so that we help to protect Singlife, our customers and each other.

- By having **Agility**, we are fast and nimble.
- By performing **Collaboration**, we will cooperate and work as One to achieve our goals.
- By showing **Empathy**, we will treat people as people and tune in to others.
- By pursuing **Innovation**, we will always find opportunities to grow & improve & strive to do things better while staying relevant.
- By giving **Trust**, we can be counted on and be responsible towards our customers.

**For Singlife employees**

We abide by the principles set out in the Code (as must contractors and other persons acting on behalf of the Group).

We read and sign acceptance of the Code every year. We understand that failure to sign up to the Code once a year will result in the automatic withholding any annual bonus we would otherwise have been awarded and may lead to further disciplinary action.

***Line managers** include people managers, team leaders, HODs, HoFs and any managers with supervisory responsibilities over employees.

### 2.3 How Do We Raise A Concern?

If we have a legitimate concern about improper behavior or suspected wrongdoing within Singlife, we act immediately considering the following:

**For Singlife line managers ***

We lead by example, actively encouraging responsible behavior. As per our Call to Action, Better starts with us as line managers.

We ensure that our team read, understand and accept the Code each year and where necessary remind them that failure to do so will result in the automatic withholding of any annual bonus they would otherwise have been awarded and may lead to further disciplinary action.

We empower our teams to conduct business in an open and honest environment in line with the Code.

We report legitimate concerns of improper behavior or suspected wrongdoing to our business unit heads or Internal Auditor.

**For Singlife business unit heads**

As a Singlife business unit head, we have overall responsibility for compliance within our business unit. We actively support the adherence to the Code and ensure that the Code is comprehensively shared with all employees, and other relevant stakeholders in the business unit, such as our partners and suppliers. We ensure that:

- All new employees are provided a copy of the Code and are given access to, and directed to, the full policies and Standards supporting the Code. The business keeps an audit trail of signed acceptance from all employees (new and existing) each year.

- All our employees are fully aware that they are required to sign their acceptance to the Code on an annual basis, and that failure to sign their acceptance to the code will result in the automatic withholding of any annual bonus they would otherwise have been awarded and may lead to further disciplinary action.

### 2.3.1 What To Report

Singlife employees should promptly report any possible illegal or unethical behaviour to the appropriate line manager or senior management. This includes but is not limited to any concerns of improper behavior within Singlife such as:

- Failure to comply with a legal obligation (including commission of a criminal offence)
- Miscarriages of justice
- Dangers to health and safety or the environment
- Fraud or accounting misstatement
- Facilitation of tax evasion
- Bribery
- Market abuse
- Human rights abuses
- Bullying and harassment
- Breach of Singlife's policies and procedures
- Behavior that harms or is likely to harm the reputation or financial well-being of Singlife, or
- The cover-up of any of the above whether or not the information is confidential.

### 2.3.2 When To Report

We report a concern as soon as there is a reasonable and genuine suspicion. We do not try to investigate the matter ourselves or try to prove that our concern is well-founded. Providing our concern is reasonable and genuinely held, it doesn't matter if it ultimately turns out to be wrong.

### 2.3.3 How To Report

We encourage each other to raise all concerns openly and with our line manager. If we are uncomfortable with this (for example, where the concern is about our line manager) or if we have already raised this with our line manager but no appropriate action has been taken, we can contact Internal Audit directly.

### 2.3.4 How Singlife Protects Its Employees

All allegations of violations will be treated thoroughly investigated in a fair and objective manner, and
kept in the strictest confidence, subject to duties arising from applicable laws and regulations.

We cannot let fear stand in the way of what is right. If we genuinely believe that improper behavior has occurred and report these concerns, we will be protected from any unfavorable treatment.

If we believe we have been unfavorably impacted, we can contact the Group Audit Officer, who will commission an independent review.

### 2.3.5 If We Raise A Concern We Know To Be False

It doesn't matter if we are mistaken; the important thing is that we act on a genuine concern. However, this assurance is not extended to anyone who raises a concern they know is untrue with malicious intent. Any employee who is found to have done so is likely to face disciplinary action.

### 2.3.6 Reporting Externally

We can report to the regulators at any time. We do not have to report to Singlife before doing so and we can also report through both channels simultaneously.

Information on the Regulators' reporting processes can be found by visiting their websites.

# 3. Singlife's Business Ethics Principles

## 3.1 Act with Integrity

What is expected from us?

- We will conduct ourselves with the highest standards of corporate ethics, integrity and honesty.
- This includes the conduct our personal and business dealings in accordance with the Singlife Group's policies, standards and values.

Why is this important?

It is fundamental to the integrity of Singlife's businesses and its employees, and to the reputation of the Group, that we operate with integrity and in an ethical manner.

## 3.2 Comply with Laws & Regulations

What is expected from us?

- We will conduct our personal and business dealings in accordance with all relevant laws and regulations.
- We comply with both the spirit and the letter of all laws and regulations in order to maintain the highest standards of business integrity.

Why is this important?

It is fundamental to the integrity of Group and its employees, that we operate within the spirit and letter of all applicable laws and regulations.

## 3.3 Reject Financial Crime

What is expected from us?

- Singlife will always seek to comply with financial crime legislation and regulation and work proactively to help protect our customers, shareholders and employees from financial crime.
- We expect, employees, business partners, suppliers, agents and other associated third parties to follow our lead.
- Singlife Group has no appetite for any intentional or repeated breaches of law, regulation or policy related to financial crime.

Why is this important?

Financial crime can be detrimental to our customers and shareholders, undermine market integrity and investor confidence or even support terrorism. We risk compromising Singlife' reputation and exposing the company and its employees to the risk of substantial fines and even imprisonment. Singlife will investigate and seek to prosecute agents, employees, directors or others suspected of engaging in acts of financial crime within Singlife.

There are six key areas of financial crime which we need to be aware of:

- Bribery and corruption
- Facilitation of tax evasion
- Money laundering and terrorist financing
- Sanctions
- Internal and External Fraud
- Market abuse

### 3.3.1 Bribery and Corruption

Bribery involves the offer, promise, payment, transfer, request, or receipt of anything of value, to induce someone to perform their role improperly. Offering or accepting a bribe is a criminal offence. Paying or offering a bribe while acting on behalf of Singlife can also expose the company to criminal action.

What is expected from us?

- We reject the offer or payment of a bribe in any part of our business activity, anywhere in the world.
- We refuse to pay or offer a bribe, no matter how small, anywhere in the world.
- We complete relevant training to be able to identify and manage the bribery risks that may arise in our roles.
- We report all offers of a bribe, requests for a bribe or suspected corruption immediately to the local Financial Crime or Compliance team.

Why is this important?

We are required to ensure we have put in place reasonable control procedures to ensure compliance with the Prevention of Corruption Act, Chapter 241. In addition, in line with the expectations of our major shareholders as well as customers and business partners, the Singlife Group endeavors to implement control measures that ensure compliance with the US Foreign Corrupt Practice Act and the UK Bribery Act. Under this law, employees and directors of the Group may be prosecuted if a bribe is paid in any part of the world to induce improper behavior for the benefit of Singlife.

### 3.3.2 Facilitation of Tax Evasion

Tax evasion is the illegal non-payment or under-payment by a taxpayer of taxes due to the relevant authorities.

What is expected from us?

- We strictly prohibit any person associated with Singlife from doing anything that supports, encourages or facilitates tax evasion.
- We act with honesty and integrity and report any suspicion of tax evasion to our local Financial Crime or Compliance team, our line manager or Internal Audit.

Why is this important?

As individuals, it is also illegal for us to help anyone evade tax. Singlife can be held criminally liable if we allow employees, or any other person associated with the company, to deliberately and dishonestly assist someone to evade tax. This could be a customer, supplier, business partner or other external party that has criminally evaded tax – we need to be able to show that we have not 'facilitated' that evasion.

### 3.3.3 Money Laundering and Terrorist Financing

Money laundering is the process by which individuals attempt to hide, disguise, move or use the proceeds of crime, such as narcotics trafficking, fraud or corruption. Terrorist financing is the use of funds, assets or services to fund or support terrorist activities. Terrorism may be funded through the proceeds of criminal activity (e.g. kidnapping) or through legitimately derived funds.

What is expected from us?

- We take care to avoid engaging in or facilitating money laundering and terrorist financing by, at, or through Singlife.
- We complete anti-money laundering training.
- We are aware of the money laundering risks in our business; complete due diligence on our customers, monitor their activities and keep their information up to date.
- We report suspicions of money laundering to the local Financial Crime or Compliance team.

Why is this important?

It is critical for the integrity of the financial industry that we keep criminals and their ill-gotten gains out of the financial system.

### 3.3.4 Sanctions

Governments and multinational organisations, including the United Nations, EU and UK impose trade and economic sanctions to pursue foreign policy or national security interests. Sanctions targets may include individuals, entities, governments or government agencies. Impacted business relationships may include clients, business partners, distributors, claims handlers or others. Generally, any business with sanctions targets is prohibited.

What is expected from us?

- We complete due diligence on our customers, business partners, suppliers, and others to ensure that we are legally able to deal with them and escalate any concerns of potential sanctions breaches to the local Financial Crime or Compliance team.
- We complete sanctions training required for our role, comply with applicable sanctions laws and regulations, and adhere to Singlife's control requirements.

Why is this important?

Breaching sanctions is a crime for the individuals involved and for Singlife and its employees.

### 3.3.5 Internal & External Fraud

Fraud can occur in many ways. At its core, fraud consists of acts of deception designed to secure unfair or unlawful financial or other benefit.

What is expected from us?

- All of us have a responsibility to play an active part in anti-fraud activity and to be vigilant.
- We need to act with honesty and integrity ourselves and help protect Singlife's assets.
- Where we have a suspicion of fraud, we report it immediately, in line with local escalation process to our manager or Internal Audit if appropriate.

Why is this important?

Singlife may be the victim of fraud from internal sources (e.g. employee expense fraud or theft of Singlife's data), and from external sources (e.g. underwriting or claims fraud). We also have a role to play in protecting our customers from fraud involving Singlife products, for example where they may fall victim to a ‘scam’ that targets their investment funds.

### 3.3.6 Market Abuse

Market abuse includes engaging in insider dealing; recommending or inducing another person to engage in insider dealing; actual or attempted market manipulation and unlawful disclosure of inside information.

What is expected from us?

- Directors, employees, advisers and agents must comply with our internal controls designed to mitigate and manage the risks of market abuse.
- We must act with integrity regarding information obtained and held on behalf of the Group and be on guard to avoid careless or inadvertent disclosures which may damage the Group’s business or that of its customers or suppliers.
- We should not disclose unpublished inside information to any other person except where it is necessary to do so to carry out their duties and is appropriately approved and recorded.
- We should not deal in securities of any other company whilst in possession of 'inside information' in connection with that company.

Why is this important?

A breach of insider trading is a criminal offense.

## 3.4 Conduct Business in A Fair Manner

What is expected from us?

- Singlife has a zero-tolerance policy for bribery and corruption and knowingly offering an unfair advantage to any person in our business dealings.
- We must always comply with the terms of business with our customers, distributors and suppliers.

Why is this important?

Fair conduct of business is essential for building long term relationship with business partners.

### 3.4.1 Gifts and Hospitality

We take care not to be compromised by gifts and entertainment when doing business with suppliers, business introducers or other third parties. This applies to gifts, entertainment and hospitality given and received.

What is expected from us?

- Business entertaining can form part of a normal business relationship. However, it should always be proportionate, appropriate and transparent.
- All Singlife employees are required to record entertainment, hospitality and gifts given and received in a local 'Gifts and Hospitality Register'.
- The provision, offer or receipt of entertainment worth SGD150 or over per person per event (or equivalent in local currency), or gifts worth SGD100 or over (or equivalent in local currency) must be recorded in the local register even if they were not accepted.

Why is this important?

Accepting gifts and hospitality could be seen as a bribe if the gift is lavish, disproportionate, or intended to influence the recipient. Offering or accepting gifts and hospitality in contravention of Singlife guidelines is a serious disciplinary offence for Singlife employees.

### 3.4.2 Supplier Relationships and Third-Party Partnerships

We believe that fair and honest relationships make Singlife a trusted business partner. It is fair to ensure that we comply with the business terms of our partners, e.g. paying for services provided within the agreed timeframe, complying with non-disclosure of information, and fully respecting the terms of licence of copyrighted goods, e.g. computer software.

What is expected from us?

- In addition to avoiding compromising offers of gifts and hospitality, we respect and comply with the terms of business partners' contracts.
- Singlife employees do not purchase goods and services from a prospective supplier if a condition of purchase is that the supplier buys products or services from the Group.

Why is this important?

We inform all of our suppliers, brokers and other business introducers of our ethics code and our obligations as a trusted business partner.

### 3.4.3 Conflicts Of Interest (COI)

By managing and mitigating perceived, potential and actual conflicts of interest, we protect the reputation of Singlife and the relationships we have with others, including our customers and employees.

What is expected from us?

- We do not place ourselves in a position of conflict against the proper conduct of our duties for the company. This include accepting any employment of consultation work for any other organization except with the exceptional approval from the CEO.
- We do not use our position at Singlife, our influence, or any company assets or resources in a way that will benefit us personally, or our family, friends, or the organisations they work with, or would lead to a conflict with the interests of Singlife or our customers.
- Read and understand the Singlife Group guidance on conflict of interest, gifts & entertainment, and charitable donations & sponsorship.
- Complete a conflict-of-interest declarations form for any actual or perceived conflict of interest and ensure this is recorded in the company COI register.

Why is this important?

Trust and integrity are an important part of maintaining our reputation as a fair business partner. By effectively managing and mitigating conflicts of interest we maintain our integrity and the trust that partners place in us.

## 3.5 Fair Dealing Outcomes (FDO)

Singlife Group is authorised and regulated by the Monetary Authority of Singapore (MAS), the Singapore regulator for the financial services industry. The principle of treating customers fairly and fair dealing outcomes (FDO) is central to the delivery of the MAS's regulatory agenda.

What is expected from us?

- We always act with integrity, considering what impact any decisions we take will have on Singlife's customers.
- All customers must be treated fairly and with respect; their needs must be the basis on which we design our products.
- Our communications must be clear, fair and not misleading (jargon-free) and clearly articulate any risks alongside benefits.
- When giving advice, we take reasonable care to ensure that advice is suitable for the customer's circumstances.
- We listen to feedback from customers and change our products, services and processes accordingly.

Why is this important?

Singlife must be able to satisfy its internal governance leadership and the MAS that, across the Group, we are operating in accordance with the MAS Directives to Singlife and importantly, that we have a culture of delivering fair dealing outcomes for customers.

## 3.6 Respect Confidentiality of Information and Uphold Competition Laws

All employees must act with integrity in relation to information obtained about Singlife during their employment.

<u>What is expected from us?</u>

- We ensure that neither us nor Singlife are in possession of, or make use of, confidential information or material improperly obtained from any third party, including for example confidential material belonging to your previous employers.
- We do not discuss, share or receive confidential or commercially sensitive information with competitors. Commercially sensitive information includes any information which is not in the public domain including details of price, premiums, commission, costs, margins and distribution strategies.
- We treat all information obtained concerning Singlife – its businesses, practices, operations and employees – as strictly confidential and ensure that we only use it for legitimately carrying out our duties and using only approved Singlife IT equipment (e.g., you should not send Singlife data to your personal email address for any reason).
- During and after employment with Singlife, we never use confidential information for our own purposes, or publish or disclose it to any third party, without specific authorisation. We never use confidential information to the detriment or prejudice of Singlife, its partners or employees.

<u>Why is this important?</u>

The exchange of commercially sensitive information, at formal or informal discussions, that could be used to influence Singlife's or other's pricing strategy or pricing decisions could be a breach of competition law.

## 3.7 Data Privacy

Our customers, employees and other stakeholders trust us to process their data responsibly and keep it secure. We respect and will protect the privacy of our employees, customers, and other stakeholders.

<u>What is expected from us?</u>

- Only use personal information for the process or purpose that has been agreed by our business area.

- Will not collect or use any extra personal information other than that which we need for the product or process that we are delivering.
- Keep personal information up to date.
- Only hold personal information for all long as we need it, in accordance with our Business Unit Retention requirements.
- Make sure that personal information is kept secure in accordance with the company's information security measures.
- Respect individual privacy rights.

Why is this important?

Failure to do so could destroy the trust our customers placed on us, subject Singlife to large financial fines, or prevent us from processing some or all personal data needed to deliver products to our customers. Any data breach could also result in regulatory fines and/or sanctions from the PDPC and MAS.

### 3.8 Report Accurately and Honestly

As a financial institution and a regulated business, it is fundamental that we report all matters accurately and honestly in accordance with the laws and regulations.

What is expected from us?

- We record all financial transactions in an accurate and timely manner according to generally accepted accounting principles and relevant laws and regulations.
- We ensure that all payments and transactions are supported by appropriate documentation which clearly identifies and describes their nature and purpose.
- We ensure that all funds and balances are accurately reflected in the books and records of the relevant companies. Accounting practices that suppress records, misstate results, obscure the nature of transactions or otherwise alter the substance of any transaction are strictly prohibited.

Why is this important?

The integrity and reputation of the company will be severely affected if our financial reports cannot be trusted. This will impact the long-term sustainability of the business.

## 3.9 Our People

### 3.9.1 People

What is expected from us?

- We treat our people with respect.
- We do not tolerate any form of abuse or harassment of employees, contractors, suppliers, customers or anyone else we deal with.
- We ensure that access to employment, development opportunities and promotions are free from discrimination on the grounds of gender, gender reassignment, sexual orientation, pregnancy and maternity, marital status, creed, colour, race, religion, age, ethnic origin, nationality, union status or disability (which can include both physical and mental conditions).
- We will base on the objective assessment of ability, relevant job-related criteria, and any relevant legislation.
- In the case of training and career development, based on agreed need.
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### 3.9.2 Health & Safety

What is expected from us?

- Singlife must provide a secure, safe and healthy environment for all employees, as well as managing risks to contractors, customers and members of the public on Singlife premises.
- We are encouraged to participate actively in achieving high standards of health and safety and are reminded that they must co-operate with management, so we are compliant with our statutory duties.

## 3.10 Our Community and The Environment

### 3.10.1 Community

What is expected from us?

- Singlife is committed to help address the challenges that people and society face and address the long-term sustainability impact on the environment and society.
- We do this by acting responsibly in our communities, extending our positive impact through insight, expertise and partnership.
- We channel financial and organisational support into our local communities.
- We share our time and skills by volunteering for the causes that matter to us.

### 3.10.2 Charity Donations and Sponsorships

What is expected from us?

- Any charitable initiative should contribute to the delivery of our Corporate Responsibility strategy.

- We do not authorize charitable partnerships, donations or sponsorships that meet any of the following criteria:

  - With or for individuals.
  - Donations or sponsorships that are not paid directly into a charitable or sponsored organisation's account .
  - With or for political organisations.
  - For projects that favour the propagation of a religious belief or where participants/beneficiaries are required to belong to a particular religion.
  - For extreme, 'high risk' sports.

- Due diligence should be carried out on all charities and organisations before a donation, partnership or sponsorship is agreed. This is to assess the viability of the charity or organisation and as part of our risk management approach.

- Donations at the request of a public official are prohibited. There is a high risk that this type of donations would be considered as a bribe or a facilitation payment.

### 3.10.3 Sustainable Environment

What is expected from us?

- We are aware of and adhere to local environmental regulations including MAS guidelines on Environmental Risk Management.

- Singlife seeks to demonstrate leadership in our effort to reduce our adverse impact on the environment, both in terms of our operations and through our role as an investor, purchaser (both for Singlife and on behalf of our customers) and employer. To this end, we all have a responsibility to reduce our use of natural resources (paper) and energy use, including business travel and minimize and recycle waste where possible.

Why is ESG important?

Singlife aims to attract and retain the best talent available as the foundation for being a talented and sustainable workforce. We have a duty to uphold our corporate reputation and our commitments to corporate responsibility are a key part of protecting our reputation.

Singlife is committed to reduce our environmental impact, to work with our suppliers to manage our impacts, to be transparent in our reporting and communications. Singlife is aligned to the UNEP's PSI (Principles for Sustainable Insurance).