<u>RELEASE</u>



Accreditation@SG Digital (A@SGD) – SecureTech track Guidelines

A@SGD-SecureTech-Guidelines Version 1.0, Mar 2019

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NOTICE

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1 INTRODUCTION

1.1 General

- 1.1.1 As Singapore moves towards becoming a Smart Nation, a priority for the Info-Communications Media Development Authority ("IMDA") is to bolster Singapore's Infocomm Media ("ICM") and technology sector to develop the next generation of digital expertise and businesses. Singapore can leverage on its position as a trusted brand to groom our digital companies that are regionally or globally competitive. Having these companies embedded in Singapore's economy will have multiplier effects on economic growth, talent flows and innovation capabilities. These digital champions also add buzz and vibrancy, lifting the entire ICM ecosystem.
- 1.1.2 The Accreditation@SG Digital ("Accreditation@SGD") is a key contributor to this priority and aims to build our technology industry through accelerating the growth of our Singapore-based innovative technology product companies who can compete globally and become the next digital champions in the region and beyond.
- 1.1.3 The Accreditation@SGD Scheme is a scheme aimed at enabling these companies to:
 - a. Establish credentials with potential buyers and investors through providing independent testing and evaluation of enterprise product companies' product core functionalities and their ability to deliver against the requirements under Accreditation@SGD, as well as, branding associated with the Singapore Government;
 - Build track record through regular market access platforms and matchmaking of Government and Enterprise demands to these companies;
 and
 - c. Scale globally through Accreditation@SGD's promotion of the companies through various media, exhibitions and collaboration with other Government agencies to reach global enterprises and overseas Government bodies.
- 1.1.4 SecureTech track is a joint collaboration with Cyber Security Agency of Singapore ("CSA") under the Accreditation@SGD Scheme to:
 - a. Improve the quality of cybersecurity products of companies in Singapore through the adoption of Common Criteria ("CC") certification;
 - b. Grow the Cybersecurity ecosystem in Singapore and enable these companies to expand internationally through tapping on the track record built in Singapore; and
 - c. Encourage and ease the adoption and procurement of CC-certified

products by government agencies and enterprises.

- 1.1.5 Accreditation@SGD aims to give confidence to enterprise buyers that a company's product core functionalities and performance, for the specified product version that was accredited, have been independently evaluated by IMDA to function as per the company's claims. Through Accreditation@SGD, IMDA also provides an independent assessment of the company's ability to deliver, i.e. its financial sustainability, and its operations team and processes to support the product.
- 1.1.6 Through Accreditation@SGD, it is envisaged that these companies can gain greater visibility and improve their chances of winning projects from potential enterprise buyers, including the Singapore Government.
- 1.1.7 The technical evaluations and assessments conducted by IMDA are documented in a Technical Evaluation Summary issued to accredited companies. IMDA makes no representations or warranties in relation to the accredited product and/or company beyond the Technical Evaluation Summary. Enterprise buyers will be able to consider a company's Accreditation@SGD status and the Technical Evaluation Summary issued as an element of their own procurement and risk management process.
- 1.1.8 This Accreditation@SGD SecureTech track Guidelines ("Guidelines") in conjunction with the Application Form, the Terms & Conditions, the Mark Style Guide and any other relevant documents issued by IMDA in connection with Accreditation@SGD constitute the set of requirements and obligations for achieving accreditation. The Guidelines introduces and provides an overview of:
 - a. The criteria and requirements for accreditation,
 - b. The process for achieving and maintaining accreditation, and
 - c. The obligations of accredited companies.
- 1.1.9 This document is intended to be used primarily by companies that would like to become accredited under the Accreditation@SGD SecureTech track. As such, all reference to Accreditation@SGD and accredited companies from section 3 onwards in this document would refer specifically to the Accreditation@SGD SecureTech track and companies accredited under the track respectively. Enterprise buyers intending to procure products from accredited companies and other stakeholders assessing an accredited company's capabilities will also find this document useful for understanding what the Accreditation@SGD SecureTech track status entails and what they can expect from an accredited company.

1.2 Organisation and Governance Structure

1.2.1 Accreditation@SGD and its overall policy are owned and managed by

IMDA.

- 1.2.2 The Steering Committee approves the award, suspension and termination, and renewal of accreditation status. The Steering Committee for Accreditation@SGD SecureTech track comprises senior management of IMDA and CSA.
- 1.2.3 The Director, Accreditation@SGD, is responsible for the implementation of Accreditation@SGD, including Accreditation@SGD SecureTech track, ensuring that organisation and management of the functions of evaluation and accreditation within Accreditation@SGD achieve high standards of competency, impartiality and consistency.

2 **REFERENCES**

Systems and software Quality Requirements and Evaluation (SQuaRE) ISO/IEC 25010

ISO/IEC 17025 General requirements for the competence of

testing and calibration laboratories,

Test Maturity Model Integration TMMI

3 ACCREDITATION@SGD PROCESS

3.1 Target Audience and Pre-Qualification

- 3.1.1 Accreditation@SGD targets Singapore-based companies that develop and own innovative high-growth infocomm products for the enterprise market.
- 3.1.2 Companies must meet the following pre-qualification criteria in order to participate in Accreditation@SGD:
 - a. The company must be registered in Singapore with substantial level of value-added economic activities conducted in Singapore, e.g. R&D activities, test bedding, IP management and technical support;
 - b. The company must have annual sales turnover of not more than \$100M (at group level); and
 - c. The company must have an enterprise product, with focus on software:
 - The company must be the product owner, and owns a substantial portion of the intellectual property for the innovative enterprise product;
 - ii. The company is not a reseller/distributor of the product; and
 - iii. The product is required to obtain CC certification.

3.2 Application, Short-listing, Evaluation and Accreditation Award Process

- 3.2.1 The accreditation process has 3 progressive stages to keep it simple and scalable, with the companies' involvement scaled up only at appropriate juncture. The 3 stages to the process are application, short-listing and evaluation, as illustrated in Figure 1 below.
- 3.2.2 The companies shall ensure that all information provided to IMDA in the accreditation process are true and correct, and must not withhold, suppress or misrepresent any material facts or information from IMDA.

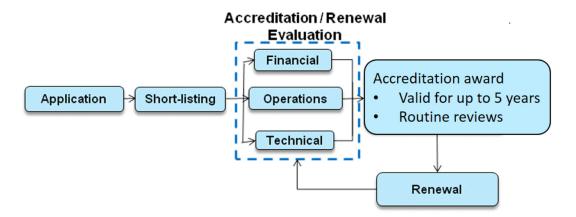


Figure 1. Three stage accreditation process.

Stage 1 - Application

- 3.2.3 A company interested to undergo accreditation shall first approach IMDA to obtain an initial assessment of whether it meets the pre-qualification criteria. IMDA may request the company to provide a brief overview of its company and demonstration of the product's value propositions for the assessments.
- 3.2.4 The company will then apply with the application form provided by IMDA. The official submission by the company must be accompanied by all supporting documents including the ACRA profile, audited financial statements, key management resumes, organisation chart, product brochures, solution specifications and business plan. All applications are to be submitted in softcopy to IMDA either via email, or in any standard media storage device in person or via registered post. The documents may be password protected during the submission to IMDA, in which case the password must be separately provided to IMDA. The company shall also appoint an Accreditation Representative ("AR") who shall be one of the key management of the company as a point of contact for IMDA to liaise with for all matters related to Accreditation@SGD.
- 3.2.5 Upon IMDA's determination, at its sole and absolute discretion, that the company meets the pre-qualification criteria, the company will proceed to Stage 2 Short-listing. A company that does not meet the pre-qualification criteria will be notified.

Stage 2 – Short-listing

3.2.6 A company who satisfies the pre-qualification criteria will be further evaluated by IMDA and must demonstrate, to IMDA's satisfaction, that it meets the short-listing criteria as follows:

Management

- a. The company must demonstrate that it has clear business plan on how to grow the product and business; and
- b. The company must demonstrate that it has strong management

team with established track records and low key-man risks.

Financials & Operations

- c. The company must demonstrate that it has a financing and/or fund raising plan going forward to sustainably operate; and
- d. The company must demonstrate that it has the capabilities and resources to support its business plan.

Customers

- e. The company must demonstrate that the product has a clearly identified customer segment(s) and demand; and
- f. The company must demonstrate that there is a sizeable addressable demand for the product to support its business plan.

Certification

- g. The product to be accredited must have CC certification. The scope of the CC certification for the product will be reviewed for appropriateness and sufficiency by CSA.
- 3.2.7 During the short-listing evaluation, IMDA may request for more information on the company's financials, or conduct interviews with the company's key management to understand its business model and interviews with reference customer(s) to obtain feedback on the use of the product. Upon IMDA's determination, at its sole and absolute discretion, that the company meets the short-listing criteria, the company will proceed to Stage 3 Evaluation. A company who does not meet the short-listing criteria will be notified.

Stage 3 – Evaluation

- 3.2.8 A company who meets the short-listing criteria shall be further evaluated by IMDA based on the 3 key areas of evaluation as outlined in paragraph 4. The company shall submit to IMDA the version of the product to be accredited and the relevant detailed technical documentations (such as technical design documents, test cases and test reports) and any certifications obtained prior to the commencement of the technical evaluation.
- 3.2.9 During the evaluation process, IMDA may communicate areas of concerns, in any of the 3 key areas of evaluation as outlined in paragraph 4, to the company in parts. Upon discussion with the company, IMDA may require the company to take and implement corrective actions in a timely manner prior to proceeding with the evaluation. This evaluation phase is estimated to take between 3 to 6 months depending on the product complexity and the company's ability to implement any corrective action required.

Award of Accreditation@SGD Certificate

3.2.10 IMDA will award the Accreditation@SGD Certificate to a company under

the following circumstances. The accreditation status will be valid for up to 5 years (actual validity period to be determined by IMDA based on evaluation conducted) from the date of a conditional or full award. The validity period will be reflected in the Accreditation@SGD Certificate.

Conditional award with corrective action(s)

- a. IMDA may, at its sole and absolute discretion, issue a conditional award to a company who has outstanding corrective action(s) to be implemented where:
 - i. IMDA has assessed the correction action(s) to be immaterial to the operation of the product.
 - ii. The company has provided evidence to prove, to IMDA's satisfaction, its ability to resolve the issue(s) and has additionally provided a comprehensive corrective action plan to IMDA for the resolution of such issue(s).
 - iii. The company has committed to implement the corrective action plan within 6 months from the date of the conditional award.

Under such circumstances, IMDA may issue an Accreditation@SGD Certificate and an Technical Evaluation Summary, where relevant, to the company for the conditional award. The Technical Evaluation Summary will include the outcome of the evaluation, the corrective action(s) and the timeframe to implement the corrective action(s). Upon implementation of the corrective action(s) and verification by IMDA that such corrective action(s) have been implemented, IMDA will issue an addendum to the Technical Evaluation Summary, where relevant, on the outcome of the verification.

Full award

- b. IMDA will issue a full award to a company who has passed all evaluation outlined at paragraphs 3.2.3 to 3.2.9 above, including addressing all corrective actions required by IMDA. IMDA will issue an Accreditation@SGD Certificate and a Technical Evaluation Summary (where relevant) to the company. The Technical Evaluation Summary will summarise the outcome of the evaluation.
- 3.2.11 The award of accreditation is only applicable to the specific product and version that had undergone the evaluation. It shall not be transferrable or applicable to other portfolio or versions of product(s) under the company.
- 3.2.12 The accreditation evaluation is not an acceptance test of the product from IMDA for any enterprise deployment and accordingly the Accrediation@SGD status shall not be taken or marketed as such. The company shall be responsible to ensure that, where necessary, proper acceptance tests are conducted to meet the needs of its clients. When requested, the company shall provide a copy of the Technical Evaluation

- Summary to a potential enterprise buyer, including the Government.
- 3.2.13 Upon the award of accreditation, the company may use the Accreditation@SGD mark provided that such use is in accordance with the Mark Style Guide. IMDA may publish the list and information of companies, the respective accredited product and types of accreditation (i.e. conditional award or full award) on IMDA's website or on any other publications relevant for Accreditation@SGD.
- 3.2.14 The company shall work with IMDA, when required, to showcase its accredited product to potential key stakeholders and partners identified by IMDA or participate in other IMDA or related Government initiatives.

3.3 Accreditation@SGD Scheme Benefits

- 3.3.1 IMDA will work with accredited companies to generate business opportunities in Government and Enterprise sectors:
 - a. All accredited companies are considered first by Singapore Government agencies for their Infocomm Media project implementations.
 - b. Strategic partnerships are forged with leading enterprises in various vertical sectors to understand market demand and IMDA will actively match-make accredited companies to relevant enterprises to generate business opportunities.
 - c. Regular engagement platforms such as showcases and thematic workshops with potential enterprise buyers will be organised for accredited companies to reach key stakeholders. These will help accredited companies to shorten their sales cycle.
- 3.3.2. IMDA will also facilitate strategic partnerships between accredited companies and go-to-market partners such as consultancy firms, large System Integrators and hardware providers. These partnerships will enable accredited companies to take on larger projects and potentially gain access to international markets.
- 3.3.3 IMDA also actively work with accredited companies on their publicity and branding to help increase the visibility of accredited companies to local and regional markets as well as key stakeholders. Accredited companies are also able to use SG:D Accredited Mark in their marketing materials for association with IMDA.
- 3.3.4 To support the scaling of accredited companies, IMDA also works with accredited companies to support their fund raising as well as leverage existing Government programmes to support their talent recruitment.

3.4 Withdrawal from the Accreditation Process

- 3.4.1 If a company decides to withdraw from the accreditation process, it must provide a written notification to IMDA that it is withdrawing. It is not required to provide a reason for withdrawal. When informed of a withdrawal by the company, IMDA will archive the information that has thus far been provided by the company unless upon the specific written instruction by the company to destroy the stated information. Any fees (outlined in paragraph 5.4) paid by the company will be forfeited.
- 3.4.2. The company may re-apply for accreditation at a later date, and such reapplication shall be treated as a new application, shall be required to undergo the full accreditation process including but not limited to the payment of the applicable fees, the submission of a full set of documents and all required evaluations.

4 ACCREDITATION@SGD EVALUATION

4.1 Types of Evaluation

4.1.1 The accreditation evaluation encompasses a holistic evaluation of the company in the three key areas as depicted in the following diagram (see Figure 2). All evaluation is conducted by the Accreditation@SGD team in IMDA, or where necessary, by 3rd party assessors appointed by or in partnership with IMDA.



Figure 2. Types of evaluation.

4.2 Technical Evaluation and Requirements

- 4.2.1 IMDA and CSA reserve the rights to conduct a technical evaluation on the product to be accredited in the event that IMDA and CSA assessed that the security certification does not cover the full scope of functional, reliability, performance, portability, compatibility, security, usability and maintainability of the product; or otherwise deem necessary.
- 4.2.2 The parameters evaluated are benchmarked using Industry testing best practices such as TMMI and ISO/IEC 25010 standards for Systems and software Quality Requirements and Evaluation (SQuaRE).
- 4.2.2 The parameters will be evaluated based on assessments of relevant documents, on-site assessments of the company's development team and processes, and product testing conducted by Accreditation@SGD team at its laboratory located in IMDA. IMDA may, at its sole and absolute discretion, rely on the independent 3rd party certification(s) or test results presented by the company for relevant parts of the technical evaluation provided that IMDA has assessed such certification or results to be reliable For example: certification from recognised industry certification bodies or signed user acceptance test(s) from enterprises deemed acceptable by IMDA.

- 4.2.3 Where, in IMDA's sole and absolute discretion, IMDA determines that the Accreditation@SGD laboratory is not able to fully evaluate the product at its premises, IMDA may choose to conduct selected aspects of the product testing at the company's premises in order to leverage on specific testing tools or set-up from the company.
- 4.2.4 IMDA may also require access to the source codes of the product and the company's staging servers for penetration tests in the event IMDA deems that security testing is necessary.
- 4.2.5 The company shall provide all resources deemed necessary by IMDA to enable the technical evaluation by IMDA, including but not limited to technical assistance in the set-up and configuration of the product at the appointed test premise, guidance on the use of the product and provision of necessary access to the source codes / back-end systems.
- 4.2.6 The technical evaluation is based on individual product's functionality claims made by the company and key product features deemed important by the reference customers of the company. Hence, the technical requirements to be met and the tests to be conducted will be uniquely defined for each product.
- 4.2.7 IMDA will determine and inform the company of the technical requirement(s) and the test plan at the commencement of the technical evaluation. Such technical requirement(s) and test plan is determined by IMDA at it sole and absolute discretion. IMDA will, however, in consultation with the company, determine such technical requirement(s) and test plan through an iterative process, taking into account the product's technical claims and capabilities by the company, interviews with the company's reference customers and, assessment of the relevant technical specifications and product documents.

4.3 Financial Evaluation and Requirements

- 4.3.1 The company must demonstrate the sustainability and scalability of its business. A financial evaluation will be conducted on the company for IMDA to evaluate the company's claims and documentary evidence, to sufficiently assure IMDA that the company would be able to sustain its operations and deliver on its potential pipeline.
- 4.3.2 In conducting the financial evaluation, IMDA may have regard to the following (non-exhaustive) requirements:

Business sustainability

- a. Ability to finance working capital and other expenditure
- b. Investment and financing cash flows

Business scalability

- c. Addressable market size and potential
- d. Business model and cost structure
- e. Business pipeline and growth projections

Reliability of financial information

- f. Reliability of business projections and management accounts
- g. Reconciliation of financial statements / management accounts
- 4.3.3 The company must demonstrate to IMDA's satisfaction, that it meets the requirements listed in paragraph 4.3.2, which must be supported by documentary evidence such as its audited financial reports, business plans, pipeline contracts and financing plans. The company must provide IMDA with any document that IMDA deems relevant for the financial evaluation.
- 4.3.4 For the purpose of the financial evaluation, the Chief Executive Officer and Chief Financial Officer, or their equivalent, of the company will be interviewed by IMDA. IMDA may also request to interview the company's existing and/or pipeline customers for reference checks.

4.4 Operations Evaluation and Requirements

- 4.4.1 The company must demonstrate its ability to deliver and support the product. An operations evaluation shall be conducted on the company to evaluate the company's internal processes and capabilities of its manpower, to sufficiently assure IMDA that the company would be able to support the product implementation and maintenance for its potential pipeline.
- 4.4.2 In conducting the operations evaluation, IMDA may have regard to the following (non-exhaustive) areas:

Strength of leadership and key management team

a. Resumes and expertise of leadership and key management team

Strength of development and operations team

- Size of development and operations team and/or partnership for product delivery and implementation
- c. Expertise of key personnel for development and operations

Internal development and support processes

d. Processes and tools in place for managing product development lifecycle

- e. Processes and partnership in place for product maintenance and support to customers
- 4.4.3 The company must demonstrate, to IMDA's satisfaction, that it has the necessary capabilities or expertise in each of the above areas, which must be supported by documentary or on-site evidence such as resumes and partnership agreements. The company must provide IMDA with any document as IMDA deems relevant for the operations evaluation.
- 4.4.4 For the purposes of the operations evaluation, the key management team of the company will be interviewed by IMDA. IMDA may also request to interview the company's existing customers for reference checks.

5 OBLIGATIONS ON ACCREDITED COMPANIES

5.1 Achieving Accreditation

- 5.1.1 Claims of accreditation may be made only after IMDA has issued the Accreditation@SGD Certificate and Technical Evaluation Summary (where relevant). Claims of conformance or accreditation may not be used in relation to any other product line, or product that does not fall within the scope of accreditation obtained.
- 5.1.2 The company must, to the best of a company's knowledge, warrant and represent that the company conforms to the accreditation and testing requirements, and to the policies herein during the validity of the accreditation status.

5.2 Maintaining Accreditation

- 5.2.1 The award of the Accreditation@SGD Certificate to a company signifies that all necessary evaluation work has been performed and IMDA is satisfied that the company and the specific version of the product in the defined environment meets the IMDA defined evaluation and testing requirements, including the validity of the CC certificate and the technical requirements set out at the start of the accreditation technical evaluation.
- 5.2.2 The company shall keep the version of the product that is accredited available for sale in the enterprise market throughout the validity of the accreditation status.
- 5.2.3 During the validity of the accreditation status, the company shall provide self-declaration to IMDA upon any material changes to the accredited product (including the validity of the CC certificate), organisation (including corporate structure, key personnel, corporate direction and financials), regulation and reputation, in a form determined by IMDA, documenting accurately and truthfully any material changes in their accredited product, service and/or system, company finances, operations or company directions. For avoidance of doubt, material changes will include, without limitation, the occurrence of a trigger change as determined by IMDA and communicated to the company upon award of accreditation.
- 5.2.4 IMDA recognises that there will be on-going changes to a company, an accredited product or its environment. As such, evaluation work previously performed for accreditation may not be repeated in all circumstances, except where the CC certificate is no longer valid, for the existing accreditation status to be applied to the changed company / product version. When any new product version with substantial changes is made available by the company, the company may send a written request to Accreditation@SGD for the existing accreditation status to be applied for the new version, provided the certificate is not older than 1

year from date of award.

5.2.5 Depending on the nature of the changes, IMDA may re-issue the Accreditation@SGD Certificate for the new product version based on the following:

Self-declaration

a. Based on the self-declaration, evidence and impact assessments provided by the company, IMDA assesses that the changes can be classified as 'immaterial' and CSA assesses that the CC certificate is still valid. In this case IMDA will issue a new Certificate and an addendum to the Technical Evaluation Summary (where relevant). The changed product version is granted the status of accreditation.

Re-accreditation

- b. Changes to the certified product or company are classified as 'material', where they affect previously performed evaluation activities or affect parts of the core product functionalities, but do not affect the validity of the CC certificate (as assessed by CSA) and are not substantial enough to require a new evaluation. The affected areas may be required to undergo re-evaluation by IMDA. The changed version will get a new Certificate and an addendum to the Technical Evaluation Summary (where relevant).
- 5.2.6 It is important to note that the maintenance of the accreditation status only considers the effect of changes to the company and product on the accreditation baseline (i.e. accreditation requirements defined at the start of accreditation).
- 5.2.7 At any time during the period of accreditation, IMDA has the right to conduct interim evaluations and/or seek additional clarifications to ensure that the accredited company meets the accreditation requirements. In these cases, any costs for incurred in connection with such interim evaluations and/or additional clarification shall be borne by the accredited company.

5.3 Suspension and Termination of Accreditation

5.3.1 IMDA may suspend or terminate the accreditation status if the company fails to meet any obligation or requirement under Accreditation@SGD, or breaches any the Terms and Conditions.

5.4 Fees

- 5.4.1 Currently, IMDA does not collect any fees for participating in Accreditation@SGD. IMDA reserves the right to impose fees in the future in for participation in Accreditation@SGD.
- 5.4.2 Where 3rd party assessor(s) are necessary for the accreditation of the

company's product, the company shall pay all 3rd party fees incurred. 3rd party assessor(s) may be required where the company has a proprietary hardware device that requires hardware testing by 3rd party laboratory or where the laboratory in Accreditation@SGD does not have the necessary equipment or technical expertise to evaluate the product.

5.4.3 IMDA will endeavour to identify and inform the company of such requirement and any 3rd party fees payable prior to the start of the technical evaluation. Where this not possible, IMDA will inform the company of such requirement and any 3rd party fees payable as soon as practicable.

6 RENEWAL

6.1 Renewal of Accreditation

6.1.1 The accreditation status is valid for up to 5 years (actual validity period is to be determined by IMDA based on the evaluation conducted) from the date of award. The period of validity is reflected in the Accreditation@SGD Certificate. The accredited company must obtain the application form from IMDA to apply for renewal of the accreditation status. The application shall be submitted to IMDA with all relevant supporting documents as required in the application form. The application form, with its supporting documents, shall be submitted to IMDA not later than 6 months prior to the expiry of the accreditation status. IMDA may, at its own discretion, decide to allow extension for the application form submission.

6.2 Renewal Process and Timelines

- 6.2.1 IMDA shall perform an assessment of the renewal application to determine whether the company still satisfies the pre-qualification and short-listing criteria as set out in paragraphs 3.1 and 3.2.6.
- 6.2.2 The company shall be required to undergo the evaluation as per paragraph 4. IMDA may, at its own discretion, decide to re-use any of the previous accreditation evaluation assessments provided that there are no substantial changes that would have altered the previous outcomes.
- 6.2.3 IMDA may, at its sole and absolute discretion, decide to extend the validity of the company's existing accreditation status to enable the completion of the renewal evaluation provided that evaluation process was not unduly extended due to any fault of the company.

6.3 Graduation of Accredited Companies

6.3.1 The aim of Accreditation@SGD is to accelerate the growth of high growth

Singapore-based companies and enable them to scale globally. In line with such aim, where IMDA assesses that the company has achieved their potential and/or the Accreditation@SGD scheme is of little or marginal benefit to the company in scaling their growth further, IMDA may graduate such companies from Accreditation@SGD. This enables IMDA to better allocate and re-distribute its resources for the benefit of other high growth Singapore-based technology product companies.

- 6.3.2 IMDA may, at its sole and absolute discretion, decide to graduate a company from Accreditation@SGD in the following circumstances:
 - The company has matured to a level under the Accreditation@SGD where incremental benefits derived from the Scheme is no longer considered substantial; or
 - b. The company has benefited fully from Accreditation@SGD and grown substantially such that it is deemed to be able to continue to effectively compete with major competitors and scale globally.
- 6.3.3 Upon graduation, the company no longer hold the accreditation status and shall comply the relevant Terms and Conditions, including, without limitation, to the discontinuation of the use of the Accreditation@SGD mark. However, in recognition of the company past accreditation status, IMDA may introduce other forms of recognition and privileges, including invitations networking events, opportunities for graduated companies to showcase their work and/or share their experiences.

7 Code of Conduct

7.1 Enterprise and Government Procurement

- 7.1.1 It is envisaged that accredited companies can gain greater visibility and improve their chances of winning projects from potential enterprise buyers, including the Singapore Government.
- 7.1.2 To assist accredited companies, IMDA has worked with the Ministry of Finance on a streamlined Government procurement process. Accredited companies and the accredited products would be listed on a Panel of Accredited Companies ("AC Panel") for Government agencies to consider first when sourcing for innovative technology products. Accredited companies are still required to demonstrate their value proposition to the interested agencies, and Government agencies may procure from any accredited companies that meet their requirements.
- 7.1.3 To participate in the streamlined Government procurement process, accredited companies will need to comply with all applicable rules and requirements imposed by the Government and/or the procuring Government agency, such as register for a GeBIZ trading account.

7.2 Code of Conduct

- 7.2.1 As the accrediting body, IMDA has an interest to ensure that accredited companies hold themselves, at all times, to high standards of conduct. In bidding for work, accredited companies must not abuse their status as an accredited company and shall at all times conduct themselves in a manner that does not bring disrepute to and/or damage of the reputation of Accreditation@SGD.
- 7.2.2 Without limitation, accredited company shall observe and comply with the following code of conduct:
 - (a) Accredited company should respond to customer requests and enquiries in a prompt manner and without undue delay.
 - (b) Where the accredited company is proposing or selling a product (including a new product version) which is not accredited, the accredited company shall disclose and inform the potential customer of the same.
 - (c) When requested by the customer, the accredited company shall present the Technical Evaluation Summary (where relevant) from Accreditation@SGD.
 - (d) The accredited company shall not misuse or abuse the accreditation status to secure projects, including but not limited to:
 - (i) Where the accredited company is invited to propose through the AC Panel, the accredited company should not cross sell or bundle other non-accredited product(s) or services with the accredited product(s), unless such product(s) or services are essential to meet the stated requirement(s) of the potential customer. PROVIDED ALWAYS that, at all times, where the accredited companies cross sells or bundles other nonaccredited product(s) or services with accredited product(s), the accredited company shall declare upfront and provide details to the potential customer such cross-selling and/or bundling.
 - (ii) The accreditation company should not unduly raise prices and/or profiteer using the accreditation status as a pretext.

8 CONFIDENTIALITY

8.1 Confidentiality

8.1.1 IMDA will treat the information provided by the company as confidential. However, IMDA may use or disclose such confidential information to 3rd parties under certain circumstances or for certain purposes – For example

- (but not limited to): for the purposes of evaluation, for the purposes of monitoring or benchmarking the company's performance, or where IMDA is required to disclose pursuant to law.
- 8.1.2 IMDA may also share any relevant information gathered through the Accreditation@SGD process with the Government of Singapore, provided always that where such information consists of the source codes, schematics and any information that is expressly marked as "proprietary", IMDA will first seek written consent of the company before sharing with the Government of Singapore.
- 8.1.3 The company shall keep confidential any information relating to its application for Accreditation@SGD or renewal of accreditation until such accreditation has been awarded by IMDA. The company shall also keep confidential all correspondence between the company and IMDA in connection with Accreditation@SGD.
- 8.1.4 The terms and conditions regarding confidentiality and non-disclosure are contained in the Accreditation Terms and Conditions.