

Supplier Code of Conduct

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1. Purpose

The Swire Bulk Holdings Pte. Ltd. and its group of subsidiaries and branches (collectively known as Swire Bulk) aims to be the leader in sustainable development in the industry we operate, and we are strongly committed to operating ethically, prudently, responsibly and safely. Our Sustainable Development Policy commits Swire Bulk to high standards on environmental, health & safety, human rights & labour policies, business ethics and community issues. It also commits us to working with suppliers who share the same standards and promote sustainable development.

This Code of Conduct has been explicitly named to closely reflect the goal that we share with all our suppliers – to make our businesses sustainable.

2. Policy Statement

We actively seek to select and work with suppliers who not only comply with laws and regulations but go beyond by setting standards that are expected of an industry leader. We also have a strong preference to work with suppliers who share our commitment to honesty and integrity and who seek to integrate principles of sustainable development into all areas of their business. We must ensure that our need to purchase goods on competitive terms is not met at the expense of labour standards, health and safety or the environment. Our suppliers are encouraged to proactively provide clear, accurate and appropriate reporting of their progress towards achieving their sustainable development objectives.

This Supplier Code of Conduct (“Code”) outlines the minimum standards we expect of for all of our suppliers:

- Reporting of progress towards achieving sustainable development goals
- Legal and regulatory compliance
- Not employing underage workers
- Not employing forced labour
- Health and Safety in the workplace
- Protection for the environment
- Provision of proper compensation and appropriate working hours for employees
- Respect for employees’ rights and not discriminate against employees
- Sharing this Supplier Code of Conduct with sub-contractors
- Having high ethical standards
- Communicating openly and effectively with employees

This policy is further supported by the following other Swire Bulk policies:

- Human Rights Policy
- Swire Bulk Operations Policy

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3. Application

This policy applies to all suppliers to Swire Bulk.

4. Definitions

Acronyms	Description
Swire Bulk	Swire Bulk Holdings Pte. Ltd. and its group of subsidiaries and branches.

5. Policy Details

5.1 Legal and Regulatory Compliance

Suppliers shall ensure their operations, and the products and services supplied to Swire Bulk comply with all national and other applicable laws and regulations.

5.2 Forced Labour

Suppliers must not use forced, coerced, bonded, or indentured, or involuntary prison labour, slave labour or any form of human trafficking.

Suppliers should not require employees to hand-over government-issued identification, passports or work permits as a condition of employment.

All work, including overtime work, shall be voluntary. Employees should be free to leave employment upon giving reasonable notice.

5.3 Child Labour

Suppliers must not:

- Employ any person under the local legal minimum employment age, or
- Employ any person in a manner which conflicts with completion of their compulsory schooling, or
- Employ any person below the age of 16 years on a full-time basis (unless part of a recognised professional apprenticeship program).
- Employ any person below the age of 18 years for work at night (unless part of a recognised professional apprenticeship programme) or in a hazardous condition.

Additionally, all young employees must be protected from performing any work that is likely to be hazardous, or likely to interfere with the child's education, or that may be harmful to the child's health, or their physical, mental, social, spiritual or moral development.

Suppliers should also adhere to legitimate workplace apprenticeship programmes and comply with all laws and regulations governing child labour and apprenticeship programmes.

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5.4 Health and Safety

Suppliers must take adequate steps to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as reasonably practicable, the causes and risks of hazards inherent in the work environment.

Suppliers should have in place or agree to adopt in a reasonable timeframe, health and safety policies and procedures. Information regarding these policies and procedures should be made readily available to employees.

Suppliers must ensure information regarding health and safety systems and standards are made readily available to employees in appropriate language/s.

Suppliers will ensure that employees are aware, through newsletters, training or other effective and frequent means of communication, of the suppliers' obligations with regard to site safety and their own obligations of ensuring the safety of themselves and others.

Suppliers should ensure at a minimum, reasonable access to potable water and sanitary facilities; fire safety; emergency preparedness and response, industrial hygiene; adequate lighting and ventilation, occupational injury and illness and machine safeguarding. Suppliers will also ensure these same standards apply to any dormitory or canteen facilities.

5.5 Compensation and Working Hours

Suppliers must provide each employee at least the local legal minimum wage (where applicable) and benefits and are encouraged to follow local voluntary codes.

All employees should be provided with written and understandable information about their employment conditions in respect to wages and working hours before they enter employment.

Suppliers must pay their employees promptly, providing each with clear, written accounting for every pay period. Wages should be paid regularly, on time and be fair in respect of work performance. Payment should not be made more than one month in arrears. Employees should be compensated for overtime according to the law and within legal working hour limits.

Deductions from wages as a disciplinary measure shall not be permitted. All disciplinary measures should be recorded.

Employees should be granted their stipulated annual leave and sick leave without any repercussions and should be able to take their stipulated maternity or paternity leave in accordance with national laws.

Suppliers are encouraged to offer employees opportunities to develop their skills and capabilities and provide advancement opportunities where possible.

5.6 Discrimination and Rights

All conditions of employment must be based on an individual's ability to do the job, and not on the basis of personal characteristics or beliefs. Suppliers must not discriminate on the basis

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of age, colour, disability, gender, national origin, race, religion, sexual orientation, or other similar factors.

Employees shall be treated with dignity and respect. No employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse, nor is there to be the threat of such treatment.

5.7 Grievance Mechanisms

Suppliers shall have in place communications mechanisms and grievance procedures that allow employees to raise concerns and complaints with management, without fear of reprisal and ensure concerns are appropriately addressed in a timely manner.

5.8 Environment

Suppliers should:

- have in place an effective system for managing environmental issues including measuring and reporting on their environmental impact;
- seek to improve the impact of their operations upon the environment; and
- take a precautionary approach to environmental matters.

We will have a strong preference for Suppliers whose goods or services can make a significant difference to reduce our environmental impact.

Where appropriate, the following provisions also apply:

- Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.
- Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be monitored, controlled and treated as required prior to discharge or disposal.
- Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals and combustion by-products generated from operations are to be characterised, monitored, controlled and treated as required prior to discharge.
- All types of waste, including water and energy, should be reduced or eliminated at source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

5.9 Bribery and Corruption

Suppliers must commit to the highest standards of moral and ethical conduct in their business. All forms of corruption, extortion, fraud and bribery should be prohibited, including those for the Supplier's own benefit or for the benefit of their relations, friends or associates. The Supplier must not under any circumstance offer or make any gift, payment, loan or other advantage to any Swire staff.

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Suppliers will have policies, codes of conduct and procedures in place to avoid all forms of bribery, corruption and fraud and ensure they are enforced.

Suppliers should disclose to Swire Bulk any situation that create a conflict of interest or the perception thereof. They are also expected to disclose to Swire Bulk if any of our officials or professional under contract with it have a material interest of any kind in the supplier's business or any kind of economic ties with the supplier.

5.10 Subcontractors and other Service Providers

Suppliers should work with their own service providers and subcontractors to ensure that they also strive to meet the principles of this Code. This should be integrated within the supplier's business processes to select and manage the performance of subcontractors and other service providers.

Suppliers and subcontractors should be paid accurately and on time.

5.11 Cyber Security and Data Protection

Swire Bulk requires Suppliers to protect Swire Bulk's and its client's data. Suppliers must design and maintain processes to provide appropriate administrative, physical, and technical safeguards that are no less rigorous than accepted industry practices on cybersecurity such as ISO 27002, NIST Cybersecurity Framework, or other similar industry standards for cybersecurity to protect the confidentiality, integrity, and availability of data. Any cybersecurity incidents, breaches, or suspected compromises that may impact Swire Bulk, must be reported promptly to Swire Bulk in accordance with the Supplier agreement. Suppliers and Swire Bulk shall collaborate to ensure compliance with applicable laws and regulations.

Suppliers are to protect personal data in compliance with all applicable Personal Data Protection Laws. Personal data provided by or on behalf of Swire Bulk should only be used, accessed, and disclosed as permitted by the Supplier agreement.

Suppliers may be required to complete a self-assessment (Assessment Questionnaire) to demonstrate the adequacy of technical and organisational measures adopted.

5.12 Supplier's Reporting on Sustainable Development

All Swire Bulk's suppliers are encouraged to proactively provide clear, accurate and appropriate reporting of their progress towards achieving their sustainable development objectives.

5.13 Communication, Documentation and Inspection

Suppliers are responsible for communicating the requirements of this Code standards to their employees. The Code should be made freely available to employees in their local language/s and in a readily accessible place.

Suppliers must maintain records of all relevant documentation required to demonstrate compliance with this Code and related laws, and where requested, should agree to make these documents available for us or our designated auditor as evidence of compliance. Where

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appropriate, suppliers may be asked to permit inspections of suppliers' sites and facilities for verification purposes in line with this Code.

Suppliers are requested to provide access to relevant documents necessary to demonstrate compliance with this Code, Additionally, we may also request occasional inspections for verification.

Suppliers may be asked to re-affirm compliance with the Code periodically. Upon request, Supplier will provide written information on its policies and practices related to compliance with the Code. Swire Bulk is committed to working with Suppliers to improve performance on topics addressed by this Code and expects Suppliers to agree to work together with Swire to jointly address applicable and relevant topics.

5.14 Sanctions Compliance

Suppliers shall comply with all applicable international and national economic and trade sanctions laws and regulations ("Sanctions Laws"), including but not limited to those enforced by the United Nations, European Union, United States, Singapore, the United Kingdom and all the jurisdictions in which Swire Bulk and Suppliers operate in, are registered or licensed.

Suppliers shall not engage in any activities that would result in a breach of Sanctions Laws, including the direct or indirect supply, sale, or transfer of goods, services or technology to sanctioned individuals, entities or countries.

Suppliers shall warrant that at the date of entering into the Supply Contract and throughout the duration of the Supply Contract that they, and any third-party they engage to fulfill their obligations under the Supply Contract, are not a sanctioned party.

Suppliers must promptly report any actual or potential violations of Sanctions Laws to Swire Bulk, including any requests or demands that would conflict with Sanctions Laws.

In the event a Supplier, or any third-party they engage to fulfill their obligations under the Supply Contract, violates or fails to comply with any Sanctions Laws, Swire Bulk may terminate any ongoing contractual arrangement between parties, and Supplier shall indemnify Swire Bulk against any and all consequences suffered by Swire Bulk that arises out of or in connection with the Supplier's violation of and/or non-compliance with Sanctions Laws.

6. Governance

6.1 Policy Owner

The policy owner is stated at the beginning of this policy. If the policy owner changes, the policy must be re-issued to document this.

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6.2 Failure to Comply

Employees must always adhere to the conditions of this policy. Non-compliance must be escalated to policy owner immediately.

6.3 Exceptions

There might be scenarios where exceptions to this policy may be required. Any exception requests must be submitted to the policy owner for consideration and approval.

6.4 Changes to Policy

Swire Bulk reserves the right to amend this policy at its sole discretion. In case of amendments, the policy owner will inform staff appropriately.

7. Related Documents

Policies	SOP	Guidelines and Manuals
<ul style="list-style-type: none"> Data Protection & Privacy Policy Human Rights Policy 		

8. Policy History

Amendment Date	Section	Revision Number	Description
22-Oct-24	5.11, 5.12, 5.13, 5.14	3	<ul style="list-style-type: none"> Addition of 5.11 Cyber Security and Data Protection, 5.12 Supplier's Reporting on Sustainable Development and 5.14 Sanctions Addition of Suppliers allowing access and re-affirm compliance with the Code under 5.13.
1-Mar-23	All	2	<ul style="list-style-type: none"> Alignment with JS&S Policy
28-May-22	All	1	<ul style="list-style-type: none"> Initial Issue

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