

Supply Chain Sustainability Code of Conduct

PURPOSE

Swire Pacific Offshore (SPO) group has worked worldwide for over 40 years and is strongly committed to operating ethically, prudently, responsibly and safely. Our Sustainable Development Policy commits the Company to high standards on environmental, health & safety, human rights & labour policies, business ethics and community issues. It also commits us to preferring to work with suppliers who share the same standards and promote sustainable development.

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

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.

APPLICABILITY

SPO group is committed to selecting and retaining qualified suppliers that meet this Supply Chain Sustainability Code of Conduct.

MANDATORY RULES/COMPLIANCE

Legal and Regulatory Compliance

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

Forced Labour

Suppliers must not use forced, coerced, bonded or indentured, or involuntary prison labour in any form.

All work, including overtime work, shall be voluntary. Employees should be free to leave employment upon giving reasonable notice. Suppliers should not require employees to hand-over government-issued identification, passports or work permits as a condition of employment.

See Modern Slavery SOP.

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, and
- in any case employ any person below the age of 16 years on a full-time basis (unless part of a recognised professions apprenticeship programme).

Additionally, all young employees must be protected from performing any work that is likely to 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. This explicitly includes the requirements of [Minimum Age Convention, 1973 \(No. 138\)](#) and [Worst Forms of Child Labour Convention, 1999 \(No. 182\)](#) irrespective of whether they have been ratified by the local country of operation.

Compensation and Working Hours

All employees must have written contracts that comply with local laws. Suppliers must provide each employee at least the legal minimum wage (where applicable) and benefits and are encourages to follow voluntary codes. 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 and deduction should not be made from employees' pay for disciplinary reasons or to compensate the employer for providing safer work conditions. Working time periods must not exceed the legal

limit, and should be notified where relevant to reflect any particular hazards or risks of the work being done. Employees should be properly compensated for overtime according to the law and within legal working hour limits.

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 and local laws.

Discriminations and Rights

All conditions of employment must be based on an individual's ability to do the job, and never on the basis of personal characteristics or beliefs. Suppliers shall not discriminate on the basis of race, colour, national or ethnic origin, gender, sexual orientation, religion, disability, age, cultural background, social group, marital status, family status or political opinion, and other similar factors.

Employees shall be treated with dignity and respect. This should be achieved by providing a workplace in which 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.

See Human Rights Policy.

Industrial Relations

Suppliers will have in place communications mechanisms and grievance procedures that allow employees to raise concerns and complaints with management.

SPO group does not require suppliers' employees to be members of a worker's association or union, but does require that its suppliers shall respect employees' rights to choose whether to be represented by third parties and to bargain collectively in accordance with local law. Harassment, intimidation, penalties, interference or reprisal should not be used to interfere with such legitimate activities.

Environment

We all have a responsibility to look after the natural environment both for today and in the future. All stages in the Supplier's supply chain shall comply with, and preferably exceed, applicable national and legal environmental requirements.

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 precautionary approach to environmental matters such as by conserving natural resources and energy consumption and reducing waste.

We will have a strong preference to select suppliers whose goods or services can make a significant difference to helping to reduce SPO's environmental impacts towards our target of "net zero".

Chemical and other materials posing a hazard if released to the environment are to be avoided if possible. If this is not possible they 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.

See Environmental Policy.

Health and Safety

Suppliers must have in place, or agree to adopt in a reasonable timeframe, health and safety policies and management systems designed to reduce work-related injury and illness, and promote the general health of employees. Suppliers must ensure information regarding health and safety systems and standards are made readily available to employees in appropriate language(s).

Suppliers should 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 other employees.

Suppliers should provide for employees as 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 prevention and machine safeguarding. Suppliers will also ensure these same standards apply to any dormitory or canteen facilities.

Suppliers should have in place a policy, which should be in accordance with all national and other applicable laws and regulations, regarding alcohol and other drug abuse prevention, and testing for such, and should communicate this appropriately to employees.

See Health & Safety Policy.

Bribery and corruption

Suppliers must be committed to the highest standards of morals and ethical conduct in their business. All forms of corruption, extortion, fraud and bribery must be prohibited, including those for the Supplier's own benefit or the benefit of their relations, friends and associates.

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

Suppliers should disclose to use immediately any situation that may appear as a potential material conflict of interest. They are also expected to disclose if any of our officials or consultants working with Swire Pacific Offshore has material interest of any kind in the supplier's business or any kind of economic ties with the supplier.

See Anti-Bribery & Corruption Policy,

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 and/or have their own Supplier Code of Conduct. 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, in a timely manner and in accordance with contractual agreements.

See Procurement Policy,

Communication, Documentation and Inspection

Suppliers are responsible for communicating the requirements of these SPO group Supply Chain Sustainability Code of Conduct standards to their employees, and the Code should be made freely available to employees in their local language/s and in readily accessible places.

Suppliers must maintain records of all relevant documentation required to demonstrate compliance with this Code of Conduct and required laws, and where requested should agree to make these documents available for the SPO group or its designated auditor as evidence of compliance. Suppliers shall allow access to relevant documents necessary to demonstrate compliance with this code of conduct, and facilities and sites to conduct audits in line with this code of conduct.

Whistleblowing

All Relevant Persons and Suppliers personnel have a responsibility to raise concerns about potential violations of SPO's Code of Conduct, including possible improprieties in financial reporting, bribery, corruption, money laundering and sanctions regulations. Any such concerns can be raised by staff in accordance with SPO's Corporate Code of Conduct.

An outside party such as any Suppliers' personnel can report any concerns relating to possible improprieties in financial reporting, bribery, corruption, money laundering and sanctions regulations through:

- Confidential Whistle-blowing Hotline: (+65) 6309 3754
- Confidential e-mail address: Whistleblower@swirespo.com
- Using mail address:
Swire Pacific Offshore Operations (Pte) Ltd.
300 Beach Road, The Concourse
Singapore 199555
(Addressed to: "DPA", and clearly marked "Private and Confidential")

If a concern is received, an impartial review and prompt investigation will be undertaken by senior Directors/General Managers unrelated to the concern raised, where relevant. SPO will make every effort to keep the identity of the reporting person confidential. Information received will be used only for the purposes of investigating and resolving the complaint or concerns raised.

See Confidential Whistleblowing Procedure.

The SPO Supply Chain Code of Conduct may be amended from time to time. The most current version of the Code of Conduct and other relevant Policies are available on our website at www.swirespo.com.

DETAILS OF SERVICE LEVEL AGREEMENT

Our Supply Chain Sustainability Standards describe our minimum requirements for:

- Legal and regulatory compliance
- Not employing under-age 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 employee's rights and not discriminating against employees
- Sharing the Standards with sub-contracts
- Having high ethical standards
- Communicating openly and effectively with employees

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