



HONG LEONG ASIA LTD

SUPPLIER CODE OF CONDUCT

Hong Leong Asia Ltd. (“**HLA**”) and its subsidiaries (collectively, the “**HLA Group**” or each a “**HLA Group company**”) are committed to conducting our businesses ethically and responsibly. This Supplier Code of Conduct (the “**Supplier Code**”) applies to all current and future suppliers of the HLA Group, and sets out the standards of conduct to which they are expected to adhere. Our core values including doing the right things and creating an impact beyond our businesses are fundamental to the way we do our business.

1. PURPOSE

As an Asian multinational company working closely with our customers to develop and deliver sustainable and innovative urban solutions, ensuring sustainability in our supply chain is important to us. Our Supplier Code takes into account, amongst others, our Environmental, Social and Governance (**ESG**) Policy ([read here](#)) as we strive to work with our suppliers to positively produce an impact on their ESG performance.

A supplier refers to any individual, business or entity (as decided by HLA Group), that supplies goods or services to any part of the HLA Group’s businesses, and includes all persons employed by the supplier, as well as sub-contractors and service providers engaged by the supplier.

2. BUSINESS CONDUCT

We expect our suppliers to ensure their employees and representatives understand and comply with this Supplier Code. It is conditional to a contract/business relationship entered into between a HLA Group company and a supplier. Failure to adhere to this Supplier Code may be grounds for the relevant HLA Group company to review the business relationship, and take mitigating actions depending on the circumstances and the seriousness of the violation.

Suppliers are expected to actively monitor their day-to-day management processes with respect to this Supplier Code, as may be amended from time to time.



2.1 Compliance with Laws and Regulations

Suppliers undertake that they will comply with all the applicable laws and regulations in the countries that their operations are based, and where they provide goods and services to the HLA Group. Where the standards of this Supplier Code differ from national laws or other applicable regulations or standards, suppliers shall abide by the stricter requirements.

2.2 Anti-Bribery and Corruption Practices

The HLA Group adopts a zero tolerance approach to fraud, bribery and corruption of any form and our anti-bribery and anti-corruption policies are set out in our Anti-Fraud, Anti-Bribery & Anti-Corruption Policy (the "[FBC Policy](#)"). The FBC Policy applies even in circumstances and in countries where the giving and receiving of bribes or such corrupt payments may be common local practice or custom.

Suppliers must commit that all their business dealings are handled with transparency and honesty. They must not, directly or indirectly or through third parties, give, promise to give, or offer, any employee of the HLA Group any gifts, kickbacks, reward, or anything else of value, to be in exchange for business or which would influence or compromise the recipient's ability to make objective and fair business decision.

2.3 Conflicts of Interest

Any situation that has actual, perceived or potential conflicts of interest must be disclosed to the HLA Group.

Suppliers and those acting on their behalf will remain free from conflicts of interest that may adversely influence their business relationship with the HLA Group. Suppliers must commit to disclose any potential conflicts of interest promptly to the relevant HLA Group company.

No personal interest, relationship or activities are to be used to interfere or conflict with the objectivity in making any business decisions of a HLA Group employee or a supplier's employee.



2.4 Fair Competition

The HLA Group supports fair competition and fair dealing and the conduct of our businesses in accordance with the competition laws and regulations of each jurisdiction in which we operate. Suppliers commit to conduct their businesses applicable competition laws that apply to them and should ensure that the principles of fair competition are respected in their dealings with, or on behalf of, any HLA Group company.

2.5 Confidentiality

Suppliers must respect the HLA Group's intellectual property, trade secrets and all other confidential, proprietary or sensitive information and shall take appropriate steps to safeguard and maintain confidential and proprietary information of its business partners and use such information only for the purposes authorised for use, and for the benefit of the HLA Group or with the written consent of the relevant HLA Group company.

2.6 Record keeping

Suppliers shall maintain accurate financial and business records in accordance with applicable laws and regulations.

3. HUMAN RIGHTS

The HLA Group upholds the fundamental principles set out in the United Nations Universal Declaration of Human Rights and the International Labour Organisation's ("ILO") Declaration on Fundamental Principles and Rights at Work. We believe respect for human rights is a global standard of expected conduct.

We do not tolerate any use of forced, bonded or involuntary labour in any of our operations. Suppliers are expected to provide a fair working environment in which their employees are treated with dignity and respect. We oppose discrimination on any basis, including any bias on the basis of ethnicity, gender, religion, nationality, age, disability, sexual orientation, or any other reasons.

Suppliers shall comply with all national laws on wages and working hours as well as international standards regarding child labour and minimum age.

We expect our suppliers to respect and uphold these fundamental human rights in their operations.



4. HEALTH AND SAFETY

Suppliers are expected to provide a safe and healthy working environment for all their employees and are encouraged to have in place policies that are designed to promote the general health of employees and prevent work-related injuries and illness.

We expect suppliers to take ownership to strengthen their own safety culture and to continuously work at improving their health and safety performance. This includes complying with the relevant laws and regulations, ensuring necessary emergency preparedness and prevention measure are in place, improving overall workplace health and safety performance and providing the necessary safety and health training and equipment for their employees.

5. ENVIRONMENTAL AND CLIMATE CHANGE

The HLA Group is committed to conduct our businesses in an environmentally conscious manner. By maintaining an open and transparent communication with our suppliers, we encourage a close collaboration to manage environmental risks and impacts in our supply chains.

We expect our suppliers to comply with all applicable national laws and regulations, and all requirements for environmental licenses and permits.

Suppliers are also expected to manage their environmental impact on emissions, energy, water and waste to minimise pollution. Environmental management is a key parameter that the HLA Group looks at when selecting our suppliers. It is hence, also expected that suppliers monitor greenhouse gas emissions in their operations by establishing a baseline, develop programs to reduce emissions and mitigate future physical or transition risks arising from climate change that will impact their business.

6. MONITORING AND COMPLIANCE

We expect our suppliers to communicate the requirements of this Supplier Code to their own suppliers and subcontractors to ensure compliance. Suppliers should cooperate with us in an honest and transparent manner including any request for information for the purpose of risk evaluation and assessment on compliance. The Company will have the right, at any time during the tenure of the contract between the Supplier and the Company, to conduct an inspection/audit with prior notification to determine full adherence to all of the above Policy.

In the event of any non-compliance, suppliers are expected to implement appropriate corrective measures in accordance with the guidelines and requirements of the relevant HLA Group company.



7. REPORTING OF CONCERNS

Suppliers may contact our Head of Internal Audit via email at hla999@hla-grp.com to report any violations of, or to raise any concerns on, this Supplier Code in accordance with our Whistleblowing Policy ([read here](#)). All such correspondence will be treated on a confidential and anonymous (to the fullest extent possible) basis.