

Jardine Matheson

Supplier Code of Conduct

Jardine Matheson (Jardines) is an investment company dedicated to building a diverse portfolio of high-quality, scaled businesses in Asia Pacific. Jardines and our portfolio companies are committed to operating in a fair and responsible manner, reducing our environmental impact and making positive contributions to the communities where we operate. Our success is driven by our relationships with our suppliers, business partners and customers.

This Supplier Code of Conduct (the Code) sets out the minimum expectations for suppliers working with Jardines. Our portfolio companies, associated companies and joint venture partners are encouraged to adopt the Code or incorporate its principles into their own policies where appropriate.

Suppliers are expected to disseminate the requirements of this Code throughout their organisation including to their employees, own suppliers, subcontractors, and service providers where applicable, in addition to their own requirements. Suppliers' performance will be evaluated over time against this Code, consistently and fairly. Where appropriate, preference will be given to suppliers that demonstrate their alignment with our sustainability commitments and their compliance with this Code.

This Code should be read in conjunction with the [Jardine Matheson Human Rights Policy](#).

Legal and regulatory compliance

- Suppliers are expected to comply with all applicable national, regional and local laws and regulations in jurisdiction within where they operate.
- In the event that a supplier is unable to adhere to this Code, they are expected to promptly notify their contact person, providing clear reasons for their non-compliance.

Forced labour

- Suppliers should not use any form of forced labour including prison labour, coerced labour, bonded labour, trafficked labour or slave labour.
- Suppliers should not demand employees to hand over government-issued identification, passports or work permits as a condition of employment.
- All work, including overtime work must be done on a voluntary basis by employees.



- Suppliers should allow employees to be free to leave employment after giving reasonable notice.

Child labour

- Suppliers should not employ individuals below the legal minimum age of employment or the age of 15 (unless it is a recognised professional apprenticeship programme), whichever is higher.
- Young employees should not be engaged in any work that disrupts their compulsory education.

Responsible recruitment

- Suppliers should ensure worker recruitment is conducted ethically and legally, free from all forms of involuntary labour, slavery, trafficking and debt bondage.
- Suppliers should ensure that workers are not charged any recruitment fees or other related costs for their employment or right to work.

Working hours and compensation

- Suppliers should pay their employees at least the local statutory minimum wage and benefits, including statutory and contractual leave entitlements.
- Suppliers should ensure that the working hours of their employees do not exceed the limits set by local laws and that overtime work is consensual and compensated appropriately.
- Suppliers should pay their employees regularly and on time, providing each with clear, written evidence for every pay period.

Freedom of association and collective bargaining

- Suppliers should comply with applicable laws and regulations relating to freedom of association.
- Suppliers should respect and not interfere with their employees' right to form, join or not join labour unions and associations.
- Where employees of suppliers are represented by labour unions and/or associations, the suppliers should negotiate in good faith with their representatives.



Discrimination, harassment and disciplinary practices

- Suppliers are expected to cultivate an inclusive environment that encourages mutual respect, embraces diversity, and provides equal opportunities for employees.
- Suppliers should not discriminate amongst their employees on the basis of race, ethnicity, gender, age, sexual orientation, disability, background, religion, or any other personal characteristics.
- Suppliers should not tolerate any form of bullying or harassment of employees and are expected to maintain a workplace free of any form of intimidation including but not limited to physical, sexual, psychological or verbal abuse.
- Suppliers should not subject their employees to inhumane disciplinary practices including the physical abuse or physical discipline and the deduction of wages as a disciplinary measure.

Occupational health and safety

- Suppliers are expected to provide a clean, safe and healthy workplace for all their employees.
- Suppliers should ensure that they have the necessary measures, systems and training in place to identify and manage health hazards to minimise harm to employees.

Environmental stewardship

- Suppliers should have policies in place outlining their commitments to sustainability and environmental management, including:
 - greenhouse gas emissions and energy consumption;
 - pollution prevention;
 - waste and water management;
 - resource efficiency; and
 - biodiversity impact mitigation.
- Suppliers are expected to source materials responsibly. They should strive to reduce excessive packaging and single-use plastic packaging and provide reusable or recyclable packaging whenever possible.
- Suppliers are expected to track and monitor their environmental performance on a regular basis to drive ongoing improvement, including, but not limited to, energy consumption, water consumption, effluent management and raw materials consumption.



Privacy and data protection

- Suppliers should ensure that they have the appropriate technical and organisational measures in place to protect the security and confidentiality of personal data and confidential information they hold.
- Suppliers are expected to comply with relevant data protection laws and best practice principles when handling sensitive information.

Bribery and corruption

- Suppliers are expected to comply with all relevant anti-corruption and anti-money laundering laws.
- Suppliers are also expected to comply with all laws surrounding bribery related activities such as those governing lobbying, gifts, political campaign contributions and payments to public officials.
- Suppliers should also have their own policies in place that are effectively communicated throughout the organisation to combat bribery and corruption.

Conflicts of interest

Suppliers are informed that Jardines' employees must not participate in activities that could compromise their independence, integrity and impartiality. In this regard, we have the following policies and guidelines in place:

- Offering, soliciting or accepting bribes, illicit payment or inducement, or engaging in any form of cash transactions with a view to influencing any decision in business is strictly prohibited.
- Gifts and favours are permissible as long as they hold relatively small or insignificant value in accordance with local customs or generally accepted business practice.
- Entertainment and hospitality should be limited to reasonable and proportionate expenses aimed at establishing or nurturing business relationships.
- Suppliers are obligated to disclose any actual or potential conflicts of interest, where the suppliers' personal interests or personal relationships (or those of the suppliers' family or friends, whether within or outside the workplace) cause, or may cause, the suppliers to make act in any way which might compromise the good faith, commercially negotiated transactions between Jardines and the suppliers.

Anti-competitiveness

- Suppliers are expected to comply with relevant anti-competition laws and not engage in deceptive trade practices, regardless of the motive or the party involved. This includes activities such as bid rigging, price fixing, and sharing sensitive information (including price, cost, and technical data) with Jardines' competitors or competitors of the suppliers.



- Fair and ethical business practices should be consistently upheld, taking into account the price, quality, and performance standards of products and services.
- Suppliers are also expected to refrain from exploiting their market dominance, whether for personal gain or on behalf of others.

Reporting violations

In case of any potential breach of this Code, suppliers or their employees or representatives may make a confidential report via the Jardines Speak Out programme or portfolio companies' own whistleblowing mechanism:

- For the Chinese mainland, Hong Kong and Macau: <https://tip-offs.com.cn/JMSpeakOut>; and
- For all other locations: <https://tipoffs.asia/JMSpeakOut>

Speak Out is a confidential hotline service run by an independent third party who will ensure strict confidentiality. All reported content is kept by the third party and only reported to designated representatives of Jardines. Speak Out reports are treated seriously and will be investigated where necessary. Any retaliation against a person reporting a potential breach of this Code in good faith will not be tolerated.

Verification

Suppliers must, on request, provide Jardines with such information as it may reasonably request to assist in the monitoring of compliance with this Code.

This Policy has been endorsed by Executive Management and will be reviewed periodically and updated as required.