

HAECO Group
Supplier Code of
Conduct

1. General

We aim to be a leader in sustainable development in the industries in which we operate. We endeavour to work with our suppliers of goods and services (“suppliers”) to help ensure that our commercial need to purchase goods and services on competitive terms is not met at the expense of labour standards, health and safety or the environment.

We value suppliers who share our commitment to integrating principles of sustainable development into their businesses.

2. Application

This Supplier Code of Conduct (“Code”) outlines the minimum standards we expect from our suppliers, who are responsible for communicating the requirements of this Code to their employees and suppliers. This Code applies to suppliers of Swire Pacific Limited and its subsidiaries in a way that is relevant to their respective businesses, while suppliers of our associated and joint venture companies and those with whom we do business are encouraged to comply with it. For details on our procurement guidelines, please refer to our [Sustainable Procurement Policy](#).

3. Requirements

3.1 Legal and regulatory compliance

Suppliers shall comply with all applicable laws and regulations of the jurisdictions in which they operate.

3.2 Modern day slavery

Suppliers shall not engage in human trafficking or any other form of modern day slavery.

3.3 Child labour

The use of child labour is prohibited. Suppliers shall adhere to the minimum age provisions of International Labor Organization (ILO), unless otherwise conflicted with applicable laws and regulations.

3.4 Forced labour

Suppliers shall not employ any forms of forced labour. Physical punishment, threats of violence or other forms of physical, sexual or verbal abuse shall be prohibited.

All work, including overtime work, should be voluntary and employees should be free to leave employment in accordance with applicable labour laws and regulations.

3.5 Health and safety

Suppliers shall provide a safe working environment and identify and control hazards associated with their businesses. Suppliers shall operate in accordance with applicable health and safety laws and regulations.

Suppliers should have appropriate measures in place to monitor workplace health and safety performance, provide adequate health and safety training, and an effective reporting and communication protocol.

3.6 Compensation and working hours

Suppliers shall operate in accordance with applicable wages, work hours, overtime and benefits laws, and compensate employees with reference to applicable industry and local labour standards.

3.7 Discrimination, bullying and harassment

Suppliers shall not tolerate workplace discrimination, bullying or harassment of employees. The basis for recruitment, placement, training, compensation and advancement should be based on qualifications, skills, experience and performance.

3.8 Freedom of association and collective bargaining

Suppliers shall respect their employees' right to form, join or not to join labour unions in accordance with applicable laws without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognised union, suppliers should establish a constructive dialogue and bargain with the union in good faith with such representatives.

3.9 Sustainable development

Suppliers should have in place sustainability policies, which may cover climate, water, waste, people, communities and other sustainability matters relevant to their businesses.

Suppliers are expected to monitor and, where appropriate, report on their environmental impact, particularly greenhouse gas emissions and energy consumption, and to find opportunities to enhance areas of sustainable development.

3.10 Business ethics

Suppliers should have appropriate measures in place to prevent bribery, corruption, fraud and anti-competitive behaviour. Such behaviour may include, without limitation, the offer and receipt of advantages, facilitation and other payments to government officials, charitable contributions, entertainment and corporate hospitality.

Suppliers shall promptly notify us of any actual or potential conflict of interest or where any of our employees, directors, contractors or agents have any economic ties or interests of any kind in any of the supplier's business or operations.

Suppliers should provide workers with a mechanism to express grievances without fear of reprisal and ensure concerns are appropriately addressed in a timely manner.

Suppliers shall promptly provide us (including those authorised by us) with all reasonable assistance (including access to staff and documents) required in order to verify compliance with this Code.

3.11 Whistleblowing

Concerns about suspected or actual improprieties relating to this Code can be raised. Confidential reports can be submitted to the following channels:

- GIAD: group.audit@jsshk.com
- EthicsPoint: swire.ethicspoint.com