

## **Supplier Code of Conduct**

In line with its [Sustainable Development Policy](#), Swire Pacific Limited aims to be a leader in sustainable development in the industries in which it operates. We must ensure that our 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 favour suppliers who share our commitment to honesty and integrity and who seek to integrate principles of sustainable development into their own businesses.

### **APPLICATION**

This supplier code of conduct describes the minimum standards which Swire Pacific Limited and its subsidiary, associated and joint venture companies expect of their suppliers and which we expect such suppliers to expect of their own suppliers.

Suppliers are responsible for communicating the requirements of this code to their employees and their own suppliers, subcontractors and service providers, where necessary.

### **REQUIREMENTS**

#### **Legal and regulatory compliance**

Suppliers should ensure that their operations, products and services comply with applicable laws and regulations.

#### **Modern Day Slavery**

We do not tolerate any form of modern slavery (including human trafficking, forced labour and child labour).

#### **Child labour**

Suppliers should not use child labour.

Suppliers must not employ any person:

- in a manner which conflicts with completion of their compulsory schooling;
- below the age of 16 years on a full-time basis (unless part of a recognised professional apprenticeship programme), or below the legal age of employment in the countries in which they are employed, whichever is higher;
- below the age of 18 years for work at night (unless part of a recognised professional apprenticeship programme) or in hazardous conditions.

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

**Forced labour**

Suppliers should not employ forced labour, including prison, indentured, bonded, military or slave labour. Physical punishment, threats of violence or other forms of physical, sexual, psychological or verbal abuse as a means of enforcing discipline or control in the workplace should not be used.

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.

**Health and safety**

Suppliers should provide a safe working environment, incorporate health and safety in the planning and conduct of their businesses, comply with applicable health and safety laws and regulations, identify and control hazards associated with their businesses, monitor their health and safety performance, provide adequate health and safety funding, training, reporting and communications and promote a strong safety culture in their organisations.

**Compensation and working hours**

Suppliers should pay at least the local legal minimum wage and are encouraged to follow applicable voluntary codes relating to compensation. Employees should not be required to work for more than the number of hours permitted by law and should be appropriately compensated for overtime. All statutory (including maternity and paternity) and contractual leave entitlements should be honoured.

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 not in more than one month in arrears. Deductions from wages as a disciplinary measure shall not be permitted.

**Discrimination, bullying and harassment**

Suppliers should not discriminate among their employees on the basis of age, gender, gender orientation, sexual orientation, relationship, family status, disability, race, ethnicity, nationality or religious or political beliefs. Suppliers should not tolerate bullying or harassment (including sexual and racial harassment) of employees.

**Industry relations**

Suppliers should respect their employees' right to join, form or not join labour unions in accordance with local law without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognised union, suppliers should negotiate with the union in good faith. Suppliers should comply with applicable laws and regulations relating to freedom of association.

**Sustainable development**

Suppliers should have in place policies intended to ensure the sustainable development of their businesses. The policies should cover climate, water, waste, people, communities and other sustainability matters relevant to their businesses. Suppliers should measure and report on their impact on the environment (in particular their carbon emissions) and should seek to reduce that impact. They should seek to reduce (or eliminate) and should deal appropriately with all waste, in particular hazardous waste and wastewater generated within their own operations.

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

**Bribery and corruption**

Suppliers should not permit bribery and corruption. To this end, they should have in place policies covering the offer and receipt of advantages, payments to government officials, charitable contributions, entertainment and corporate hospitality and agents, consultants and joint venture partners.

Suppliers should disclose to Swire any situation that may appear as a material conflict of interest. They are also expected to disclose to Swire if any of Swire's officials or professionals 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.

**WHISTLEBLOWING**

Suppliers may raise concerns about suspected or actual improprieties relating to the Swire Pacific group. Confidential reports can be made to the group internal audit department (GIAD) of John Swire & Sons (H.K.) Limited or EthicsPoint, a third-party service provider.

- GIAD: [group.audit@jsshk.com](mailto:group.audit@jsshk.com)
- EthicsPoint: [swire.ethicspoint.com](http://swire.ethicspoint.com)

See [Whistleblowing Policy](#) for details.

**VERIFICATION**

Suppliers should be prepared to give to Swire Pacific Limited and those authorised by it all reasonable assistance (including access to people and documents) required in order to verify compliance with this supplier code of conduct.

**REVIEW**

We will review this policy as appropriate and, in any event, once every 3 years.

This Supplier Code of Conduct has been endorsed by the Group Risk Management Committee (GRMC), which is delegated with the responsibility to provide oversight of the Group's risks through the setting of risk management policies and strategies by the Swire Pacific Board.