



SUPPLIER CODE OF CONDUCT

Introduction

JJ-Lurgi's Supplier Code of Conduct (the "**Code**") sets out the principles and standards of business ethics and conduct expected by JJ-Lurgi Pte Ltd and its subsidiaries (collectively referred to as "**JJLE**") from its suppliers including their employees, personnel, agents, and subcontractors (collectively referred to as "**Supplier(s)**").

As Suppliers are a critical part of JJLE's network, it is essential that Suppliers conduct their business in an ethical, legal, and responsible manner and work. Suppliers are therefore expected to read and understand the Code, adapt their behaviour to the guidelines set out in it and to comply with the Code.

1. Laws and Ethical Standards

- a) JJLE requires that all business will be conducted in an ethical manner and in a manner adhering to all applicable laws and regulations including without limitation laws on:
 - i) Human, social and labour rights;
 - ii) Health and safety;
 - iii) The environment;
 - iv) Business ethics practices including antitrust, anti-corruption, free competition, international trade compliance;
 - v) Protection of data and information.

2. Human, social and labour rights

JJLE requires that all workers are treated with dignity and respect, and that their basic human rights are upheld. This includes the following:

a) Child & Forced Labour

- i) No one is employed under the legal age of employment in any country or local jurisdiction.
- ii) The minimum working age shall not be less than the legal minimum age, under applicable laws, or the age of 15 years, even where local legislation permits younger children to be employed.
- iii) Workers under the age of 18 shall only work in accordance with legal requirements of this country of employment (eg. With regards to working time and working conditions) and subject to any requirement regarding education or training.
- iv) Any forced, bonded, compulsory labour, child labour, modern forms of slavery and all kinds of slavery or practices akin to slavery or extreme economic exploitation are prohibited. All labours must be voluntary and fair compensation paid according to the local living conditions.

b) Compensation and Working Hours

All applicable local laws and mandatory industry standards regarding working hours, including overtime, rest breaks and paid vacation shall be complied.

c) Freedom of association and collective bargaining

- i) All workers receive compensations in accordance with local minimum wage legislation.

- ii) All workers are paid in a timely manner and clearly convey the basis on which workers are being paid. Deductions from wages as a disciplinary measure shall not be allowed, if not legally permitted.
- iii) The right of workers to form or join a union/employee representation of their choice, free from threat or intimidation, is respected, as well as ensuring effective recognition of the right to collective bargaining in accordance with applicable local laws.

d) Diversity and inclusion

- i) An inclusive work environment that values the diversity of its workers is promoted.
- ii) There are policies in place that prohibit discrimination of any kind, neither because of race, gender, disabilities or age, nor because of sexual orientation, religion or belief.

3. Health and Safety

JJLE requires that all workers have the right to a healthy, safe and secure work environment. This includes the following:

- i) The taking of necessary precautionary measures against accidents and damage to health that may arise in connection with the JJLE's and Suppliers' activities by establishing and applying appropriate occupational safety systems;
- ii) ensuring the health and safety towards internal and external workers; and
- iii) providing training and ensuring that all internal and external workers are knowledgeable on the topic of workplace safety.

4. Respect for the Environment

JJLE requires that the air, water, land and biodiversity are protected and not harmed. This includes the following:

- a) Compliance with all applicable environmental laws, regulations and standards as well as implement effective system to identify and eliminate potential hazards to the environment;
- b) Document adherence to environmental permits and compliance obligations;
- c) Reduce environmental impacts including the reduction of emissions to air, water, and land;
- d) Minimise impact of products and activities on biodiversity, climate change and water scarcity; and
- e) The prohibition of unlawful eviction and unlawful taking of land, forests and waters.

5. Business Ethics Practices

JJLE requires all Suppliers to conduct their business by adopting the highest standards of ethical behaviour.

a) Bribery and corruption

Suppliers should:

- i) Adhere to all applicable national and international anti-corruption laws and regulations;
- ii) Avoid (neither directly or indirectly) offer, provide or accept anything of value to improperly influence an official act or to secure an improper advantage in order to obtain or retain business. This includes so-called facilitation payments or other benefits provided to public officials for routine non-discretionary actions; and
- iii) Avoid participation in or knowingly benefit from, any kind of corruption, extortion or bribery.

b) Free competition

Suppliers

- i) Shall comply with all national and international laws and regulations applying to fair competition and antitrust; and

- ii) Are prohibited to engage in any anti-competitive practices, such as price fixing, sharing markets or customers, market collusion or bid rigging.

c) International Trade Compliance

Suppliers

- i) Shall comply with all applicable international trade regulations including export control, embargoes, sanctions, and customs laws and regulations; and
- ii) Ensure that it, its beneficial owner(s), all its agents and any other subcontractors used by Suppliers are not listed on any sanction lists as follows:

OFAC	https://home.treasury.gov/policy-issues/financial-sanctions/sanctions-programs-and-country-information
UN	https://www.un.org/securitycouncil/sanctions/information

d) Money laundering & financial records

Suppliers shall comply with all applicable laws and regulations designed to combat money laundering activities and shall also maintain financial records and reports according to applicable laws and regulations.

6. Data Protection and Information Security

JJLE requires Suppliers to comply with data protection and information security laws and official regulations when collecting, storing, processing, transmitting and disclosing personal data.

7. Application and Enforcement

This Code is applicable to all Suppliers of JJLE. Suppliers shall undertake to procure its own sub-contractors and its and its sub-contractors' employees, personnel, agents, principals, contractors and/or representatives (if any) comply with the principles of this Code.

In the event that this Code conflicts with the terms of any contract entered into by Supplier and JJLE and/or its subsidiaries, Supplier shall comply with this Code or the contract, whichever is more stringent.

Depending on the circumstances and the gravity of violation of this Code, failure to adhere to this Code may be a ground for JJLE and/or its subsidiaries to terminate the services of Supplier. JJLE and/or its subsidiaries may, at its sole discretion, give time to the Supplier to remedy its breach of this Code. If such breach cannot be remedied within thirty (30) days or such other period as agreed by JJLE and/or its subsidiaries, JJLE and/or its subsidiaries reserve the right to terminate the services of Supplier without liability and without prejudice to any rights or remedies that JJLE and/or its subsidiaries may have under law and/or equity.

8. Whistleblowing system

JJLE maintains a whistleblowing channel for the reporting of any reasonably suspected ethical violations or misconduct of the Code at right-to-speak@jjsea.com. The whistleblowing channel is available worldwide to all employees of JJLE, as well as to its Supplier(s) and their employee(s).



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Supplier's Declaration

Acknowledgement and Adherence to this Code

We acknowledge that we have read and understand, and agree to adhere to, the provisions of this Code. We further confirm it will apply to any existing and future contractual relationships with any JJLE entities and/or its subsidiaries.

Company Name (and seal, if applicable) : _____

Name of the Authorised Representative : _____

Position : _____

Signature : _____

Date : _____