



THE HONGKONG AND SHANGHAI HOTELS, LIMITED
香港上海大酒店有限公司

SUPPLIER CODE OF CONDUCT

**Compliance with Standards
and Legislation**

Supplier shall respect and comply with all national and local legislation applicable to the conduct of their businesses, including but not limited to corporate governance, anti-corruption practices, labour standards, environmental protection, health and safety standards and data privacy.

Where any infringement of the standards or laws may affect Supplier's ability to provide the products or services in accordance with this Code of Conduct, Supplier shall promptly inform The Hongkong and Shanghai Hotels, Limited ("HSH") of the relevant situation.

Supplier shall also strive to meet the principles set out in the United Nations Global Compact, the UN Universal Declaration of Human Rights, the Conventions of the International Labour Organisation and the OECD Guidelines for Multinational Companies.

Forced Labour

There shall not be any use of forced labour, whether in the form of prison labour, indentured labour, bonded labour or otherwise.

Child Labour and Exploitation

No person shall be employed under the age of 15, or under the minimum age of employment specified by the law of the country where Supplier is based, or in manner which conflicts with completion of compulsory education.

Supplier is responsible for verifying the age of their employees and maintains copies of their employee's proof of age. Supplier must ensure that young workers are not engaged in work that would cause physical or mental harm, and ensure that they are protected from any form of exploitation including sexual exploitation.

Anti-Slavery and Human Trafficking

Any form of slavery and/or human trafficking, or any contribution thereto, is strictly prohibited. Supplier shall comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force.

Freedom of Association

Where the right to freedom of association and collective bargaining is not restricted under law, employees of the Supplier shall have the right to join or form trade unions and to bargain collectively, and Supplier shall not interfere with, obstruct or prevent such activities.

Harassment or Abuse

Every employee of Supplier shall be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse.

Non-Discrimination

Supplier must ensure that no person shall be subject to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, or social or ethnic origin.

Health and Safety

Supplier shall provide a safe and healthy working environment in compliance with all applicable laws and regulations to prevent accidents and injury to health arising out of, linked with, or occurring in the course of, work or as a result of the operation of employer facilities. Supplier shall ensure that workers have access to clean drinking water, sanitary facilities, fire-extinguishers, and fire exits and that adequate lighting and ventilation are provided at the workplace. Employers shall ensure that the aforementioned standards are also met in any canteen and/or dormitory which are provided for workers.

Machinery and Equipment

All machinery and equipment used by the Supplier are properly owned or licensed, and are in good working order. Supplier must ensure that every employee will be properly trained before being asked to use any machinery or equipment.

Wages and Benefits

Supplier recognises that wages are essential to meeting employees' basic needs. Supplier shall pay employees at least the minimum wage required by local law and shall provide legally mandated benefits.

Hours of Work

Except in extraordinary business circumstances, working hours of employees of the Supplier shall not exceed the legal limit in the country of operation. Time off for rest days, public holidays and annual leave shall be granted.

Environmental Stewardship

Supplier shall conduct their operations in compliance with applicable local and national environmental laws and regulations. Supplier is encouraged to use machinery, equipment, vehicles, materials and processes which maximise energy and resource efficiency, in particular to reduce single use plastics and use sustainable alternatives and seek to continually reduce the environmental impact of their operations, services provided and products produced.



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Privacy, Data Protection and Confidentiality

Supplier is committed to protecting the privacy, confidentiality and security of the personal and confidential information they hold and to complying with the applicable data protection laws and principles of confidentiality with respect to the processing, use and management of personal data and the handling of confidential information.

Anti-Bribery and Corruption

Supplier has a zero-tolerance approach to any form of corruption (whether private, public, direct or indirect), fraud and money laundering, and is committed to complying with all applicable anti-bribery and money laundering legislation. Supplier shall not authorise, offer, give, solicit, accept or agree to do so, even if such conduct is legal or permitted under applicable law and local practice. Supplier will also implement and maintain adequate procedures designed to comply with this requirement.

Conflicts of Interest and Gifts & Hospitality

Supplier shall, to the best of its ability, avoid any conflicts of interest and avoid professional interests being influenced by personal interests. An appropriate system is set up to govern the offering and receipt of any gifts and hospitality, which are not used to gain undue influence and are suitable and proportionate.

Ethics

Supplier shall not employ anti-competitive practices, seek competitive advantage through illegal or unethical business practices, and shall at all times compete for business based on the price, quality and performance standard of their products and services.

Supply Chain Engagement

Supplier shall ensure that it conducts its business with its own suppliers and contractors in accordance with the standards and principles set out in this Code of Conduct. Supplier shall communicate this Code of Conduct or equivalent standards and principles to its suppliers and contractors and ensure that the relevant standards and principles are taken into account when selecting suppliers or contractors.

Monitoring of Compliance

Supplier shall ensure that it maintains a complete set of records to trace the supply chain of all goods and services provided. Supplier authorises HSH and its principals, as well as any duly qualified third party mandated by HSH, to conduct scheduled and unscheduled inspections of the Supplier's premises and records, and to meet the Supplier's personnel for the purpose of ensuring compliance with this Code of Conduct.

Corrective Action

When violations are found, HSH and Supplier will agree on a corrective action plan that eliminates the problem in a timely manner. If it is determined that Supplier is knowingly and/or repeatedly in violation of this Code of Conduct, HSH and its principals shall take appropriate corrective action, which may include cancellation of orders and/or termination of business with Supplier.

HSH Contact

Any actual or suspected breach or violation of this Code of Conduct shall be reported to HSH by contacting speakup@peninsula.com.