

SUPPLIER CODE OF CONDUCT



ComfortDelGro Group Procurement Policies & Procedure Manual



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ComfortDelGro and its subsidiaries worldwide (hereinafter collectively referred to as "ComfortDelGro") procures a wide range of goods or services from various businesses, companies, corporations, persons and entities, including their employees, agents and representatives (hereinafter collectively referred to as "Suppliers").

ComfortDelGro requires and expects its Suppliers to operate in accordance with the principles in this Supplier Code of Conduct ("Code") and in full compliance with all applicable laws and regulations.

Suppliers are required to adhere to all applicable laws (including but not limited to antitrust, anti-competition, anti-corruption and anti-fraud policies), maintain high ethical standards, have clear health and safety policies, strict environmental policies, and adopt fair employment practices.

It is the responsibility of Suppliers to ensure their employees and representatives understand, comply and act consistently with this Code. Failure to adhere to this Code may result in disqualification from consideration for business, and/or future business, with ComfortDelGro.

1. Compliance with Laws and Regulations

1.1. Abidance with the Law

Suppliers' business operations, as well as all goods and services supplied to [ComfortDelGro](#), must fully comply with the laws and regulations of the countries where Suppliers' operations are based as well as where goods and services are provided to [ComfortDelGro](#).

1.2. Use of Fair Business Practices

Suppliers must practise fair competition in accordance with local antitrust and competition laws. Activities that restrict competition must be avoided. Commercial decisions, including prices, terms of sale, division of markets and allocation of customers, must be made independent of understandings or agreements with competitors.

2. Ethics and Conflict of Interest

2.1. Anti-Corruption Stance

Suppliers must conduct their business with integrity, transparency and honesty. [ComfortDelGro](#) does not condone any corrupt practices such as bribery, extortion or embezzlement in all business interactions. Suppliers are prohibited from offering, paying, soliciting or receiving (whether directly or otherwise) any form of bribe as inducement or reward for any business transaction with or involving [ComfortDelGro](#). The term "bribe" broadly includes any illicit advantage such as (but is not limited to) cash, cash equivalents, property, loans, commissions, services, benefits in kind or other advantages.

2.2. Anti-Fraud Stance

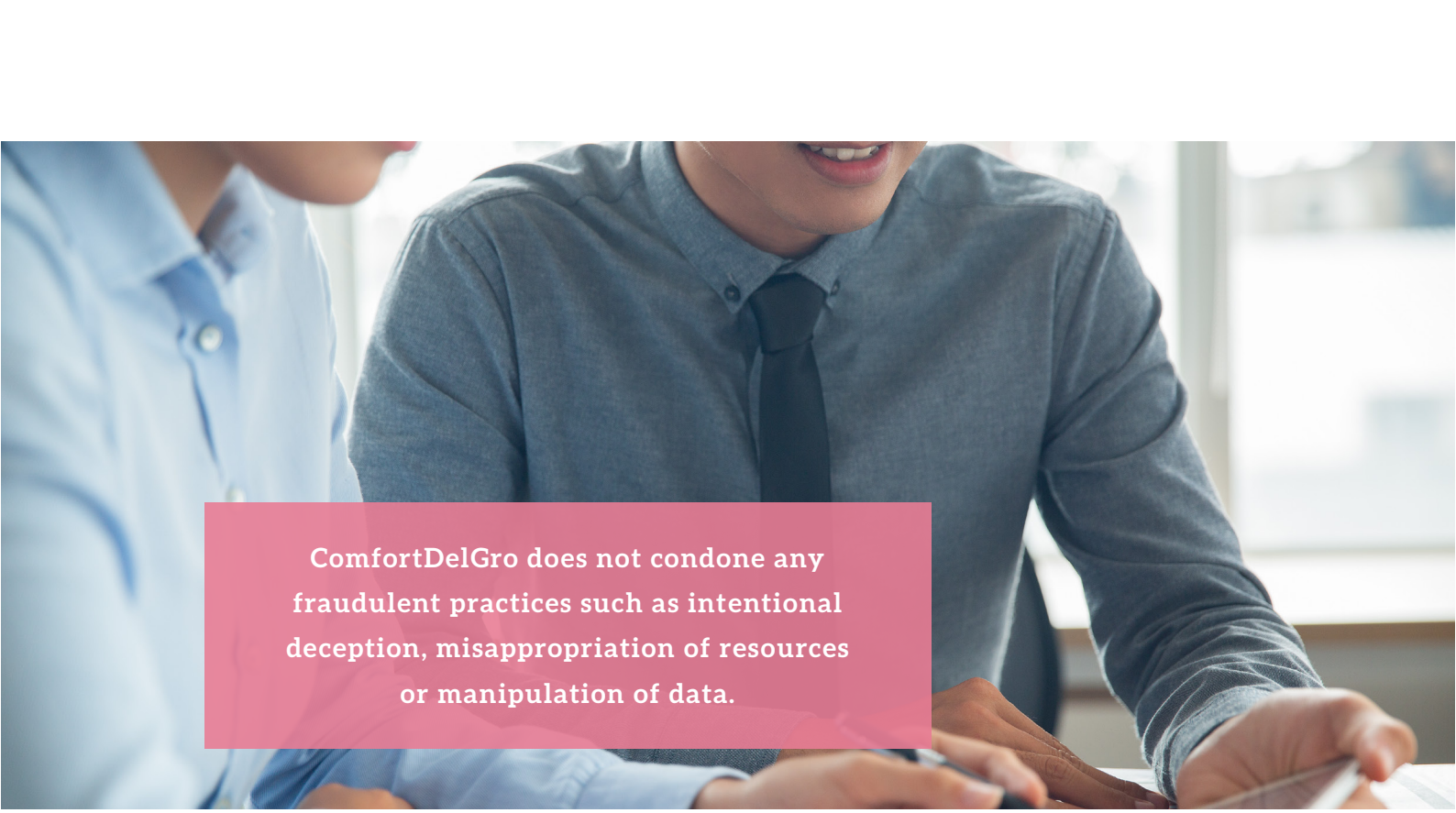
In the same vein, [ComfortDelGro](#) does not condone any fraudulent practices such as intentional deception, misappropriation of resources or manipulation of data. Suppliers are prohibited from altering or falsifying records, failing to account for monies received or knowingly providing false information for any business transaction with or involving [ComfortDelGro](#).

2.3. Gifts and Entertainment

[ComfortDelGro](#) is committed to conducting all business without undue influence. This requires it to exercise good judgment and practise moderation in receiving business gifts and entertainment.

Suppliers must not offer or give gifts or hospitality (including kickbacks, favours, cash, gratuity, entertainment or anything of value) to any [ComfortDelGro](#) employee that is intended as, or may be viewed as an attempt to improperly influence business decisions.

Employees will respectfully decline entertainment, gifts or other benefits that could in any way be construed as, or give the appearance of, attempting to influence business decisions in favour of any person or organisation with whom [ComfortDelGro](#) may have business dealings.



ComfortDelGro does not condone any fraudulent practices such as intentional deception, misappropriation of resources or manipulation of data.

2.4. Conflicts of Interest

Suppliers should avoid any conflicts of interest that may adversely influence their business relationship with [ComfortDelGro](#). Suppliers must disclose all actual, potential or perceived conflicts of interest situations and/or relationships promptly to [ComfortDelGro](#).

3. Human and Labour Rights

3.1. Human Rights

ComfortDelGro believes that it is our responsibility to respect the human rights of the people in all the locations that we operate in. ComfortDelGro's Human Rights Commitment is guided by the Universal Declaration of Human Rights, the United Nation's Global Compact's Principles on Human Rights and the International Labour Organization (ILO) Conventions on Labour Standards in aspects of our employment practices as well as Workplace Health and Safety. To learn more on ComfortDelGro's Human Rights Policy, please visit <https://www.comfordelgro.com/sustainability>.

Suppliers shall uphold and comply with the highest international standards on human and labour rights protection.

3.2. Anti-Harassment and Abuse

Suppliers shall ensure that all of their employees are humanely treated with respect and dignity. All forms of harassment and abuse, including but not limited to physical violence, sexual exploitations or abuse, verbal intimidation, psychological harassment, coercion and corporal punishments are not tolerated.

3.3. Non-Discriminatory Employment

Suppliers shall apply fair and ethical standards in their employment practices. This includes

non-discrimination in employment, recruitment, advertisements for employment, compensation, termination, upgrading, promotions, and other conditions of employment against any employee or job applicant on the bases of race, ethnicity, gender, national origin, age, religion, marital status, disability, sexual orientation or gender identity.

3.4. Ethical Employment

Suppliers must comply with all national laws on wages and working hours as well as local standards regarding child labour and minimum age.

3.5. Freedom of Association and Collective Bargaining

Suppliers shall recognize and respect its employees' freedom of association, collective bargaining and rights to representation through the appointed trade union.

4. Workplace Health, Safety and Quality

4.1. Healthy and Safe Working Environment

Suppliers must have in place health and safety protection policies and management systems to provide a secure working environment. They must be designed to promote the general health of employees and reduce work-related injury and illness. For example, protective equipment and tools must be provided and replaced/maintained regularly.

4.2. Safety

The safety of all goods and services supplied must be ensured through appropriate policies, implementation and monitoring.

4.3. Quality

Suppliers' policies and management systems must be developed to ensure that the quality of all goods and services are as specified in their contracts with [ComfortDelGro](#).

5. Corporate Social Responsibility and Environmental Sustainability

5.1. Corporate Social Responsibility

[ComfortDelGro](#) is committed to building positive relationships with the communities in which we live and work by showing our support and care for the poor, the sick, the underprivileged and the aged. Suppliers are encouraged to support us and also seek similar opportunities in area of Corporate Social Responsibility.

5.2. Environmental Sustainability

Suppliers must endeavour to minimise the impact of their operations on the environment, and are encouraged to adopt effective environmental management practices and standards. Local environmental laws and practices such as those pertaining to waste disposal (proper handling of toxic and hazardous waste, segregation where regulated, etc), air emissions and pollution must be complied with.

Suppliers are encouraged to identify, manage and reduce its greenhouse gas emissions from its operations. This includes adoption of eco-efficient practices, green technologies and transiting to cleaner energy.



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6. Use of Information

6.1. Insider Trading

Suppliers must not trade in the securities of [ComfortDelGro](#) either directly or through an intermediary while in possession of inside information (i.e. confidential material, non-public information) relating to [ComfortDelGro](#) nor should they pass such information on to others.

6.2. Proprietary Information

Any information used by Suppliers in their business relationship with [ComfortDelGro](#) that is either proprietary and/or not public must be protected against loss and infringement. Any disclosure or use of such information other than for the purposes of discharging its obligations to [ComfortDelGro](#) must first be authorised by [ComfortDelGro](#).

6.3. Personal Data

Supplier shall respect and comply with all applicable laws relating to the protection of personal data, have in place reasonable physical and electronic measures to ensure the security of personal data, and use any personal data disclosed by or collected on behalf of [ComfortDelGro](#) only for the purpose(s) for which the relevant personal data is disclosed or collected.

7. Communication

7.1. Training and Communication

Suppliers shall ensure adequate communication and compliance of this Code to their employees and supply chain. Where needed, suppliers shall ensure the right and adequate training is provided to employees in their supply chain.

8. Risk Management

8.1. Risk Management System

Suppliers are expected to put in place a risk management procedure that would allow it to identify and mitigate operational and legal compliance risks in all obligations stated in this Code. Suppliers are also encouraged to conduct regular assessment of its facilities and operations, and to extend such checks to its supply chain. It is the supplier's responsibility and obligation to inform [ComfortDelGro](#) timely in light of any alleged or actual breach of this Code.

8.2. Due Diligence

[ComfortDelGro](#) reserves the right to conduct due diligence check and audits on its suppliers for compliance with this Code. Suppliers may be requested to provide relevant policies and procedures, where necessary, access to employees and other personnel, as well as associated evidence to demonstrate adherence.

9. Ethical Concerns

If any Supplier has an actual or potential ethical concern related to the Code, they can make use of the [ComfortDelGro Alert Line](#).

ComfortDelGro Alert Line

The ComfortDelGro Alert Line comprising the following personnel has been set up to facilitate the reporting of incidents and the handling of information or evidence on matters that will give rise to whistle blowing:

Group Chief Internal Audit Officer

DID: +65 6383 7010

Email to: gciao@comfortdelgro.com

and/or the respective Chairmen of Audit & Risk Committee (ARC)

For [ComfortDelGro](#), email to: ARC_Chairman@comfortdelgro.com

For [SBS Transit Ltd](#), email to: ARC_Chairman@sbstransit.com.sg

For [Vicom Ltd](#), email to: ARC_Chairman@vicom.com.sg