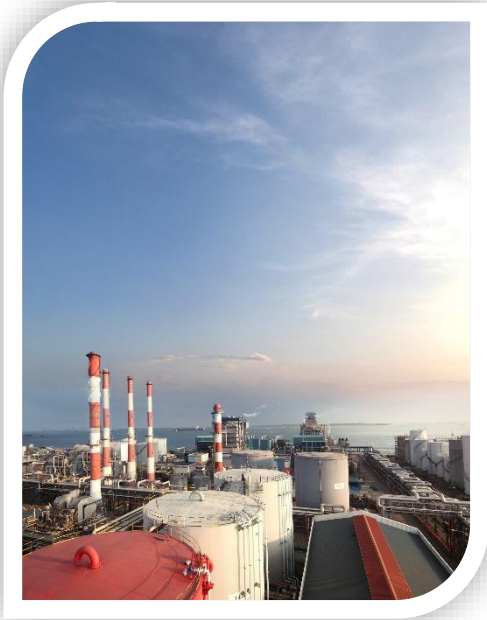




Supplier Code
of Conduct



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1. Policy Statement

At Sembcorp, we are committed to building sustainable businesses that create long-term value while upholding high standards of ethical conduct and sustainability. We seek to engage Suppliers who share these principles and to collaborate with them in maintaining a resilient and sustainable supply chain.

This Supplier Code of Conduct (“**Code**”) sets out the minimum standards expected of Suppliers when providing goods or services to Sembcorp. Suppliers are required to comply with this Code at all times when conducting business with Sembcorp.

2. Scope and Application

This Code applies to any individual or organisation that provides goods and/or services to Sembcorp, including vendors, contractors, consultants and other business partners under contract (“**Suppliers**”).

Sembcorp expects Suppliers to communicate and promote the principles of this Code to their subcontractors, agents and other third parties involved in delivering goods or services to Sembcorp, and to take reasonable steps to ensure that such parties uphold standards consistent with this Code.

Sembcorp reserves the right to conduct enquiries and audits to verify compliance with this Code. Suppliers shall cooperate fully with Sembcorp in connection with any such enquiry or audit, including by providing access to relevant information and records in a timely and transparent manner.

3. Our Expectations of Suppliers

3.1 Compliance with laws

Suppliers must comply with all applicable local laws in the countries in which they operate. Where the provisions of the law and this Code address the same subject, Suppliers are expected to adhere to the higher standard.

3.2 Business Ethics

Sembcorp expects its Suppliers to adhere to the following principles:

Anti-bribery and corruption

Suppliers must not engage in any form of corruption, collusion, kickbacks, bribery, facilitation payments or fraud. Suppliers shall not offer any gifts or other benefits to Sembcorp employees, or to anyone acting on Sembcorp’s behalf, that could improperly influence decisions or actions. Sembcorp also prohibits any party from engaging in bribery or corruption on its behalf.

Trade laws and sanctions

Suppliers must comply with all applicable trade sanctions and export controls laws.

Fair competition

Suppliers must compete fairly and in compliance with all applicable competition laws.

Non-public information and intellectual property

In conducting all activities, Suppliers are expected to use non-public information appropriately and to ensure that all intellectual property rights are respected.

Conflict of interest

Suppliers must avoid situations where a conflict of interest may arise. They must promptly disclose to Sembcorp any actual or potential conflict of interest. In exceptional circumstances, Suppliers must follow the agreed procedure for managing such conflicts. Conflicts of interest may include situations where a Supplier's employee or contracted professional has a personal interest or business relationship of any kind with Sembcorp's business, or where the Supplier is acting on behalf of Sembcorp or a competitor of Sembcorp.

Cybersecurity and data protection

Suppliers must implement appropriate measures to safeguard personal data, Sembcorp non-public information, and digital systems from unauthorised access, data leakage, misuse, or cyber threats. Suppliers are expected to comply with applicable data protection and cybersecurity laws and to notify Sembcorp promptly of any data breaches or cybersecurity incidents that may impact Sembcorp's operations or information.

3.3 Human Rights

Suppliers must comply with all applicable human rights and employment laws and regulations in the countries in which they operate. Suppliers are expected to uphold the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, which includes:

- freedom of association and the right to collective bargaining,
- elimination of forced or compulsory labour,
- abolition of child labour,
- elimination of discrimination in respect of employment and occupation, and
- provision of a safe and healthy working environment.

3.4 Health, Safety and Quality

Suppliers are required to manage all health and safety risks associated with their activities, products and services, in line with our Group Health, Safety, Security and Environment Policy Statement.

Workplace health and safety

Suppliers are required to implement and maintain effective safety management systems which comply with industry, national or international standards. Suppliers must also comply with Sembcorp's health and safety requirements. This includes taking reasonable care to ensure, through appropriate policies, procedures, risk assessments, training and supervision, that all workers are protected from unsafe work practices, unsafe plant and equipment, hazardous substances, and uncontrolled work conditions, and that safe methods of work are consistently implemented and monitored.

Work environment and housing facilities

Suppliers must provide a safe, clean, comfortable and hygienic working environment and, where applicable, residential or overnight facilities that meet the basic needs of workers.

Product safety and quality

Suppliers are required to deliver products and services that meet Sembcorp's requirements and comply with recognised and contractually agreed safety and quality requirements. At a minimum, Suppliers must comply with applicable local laws in the country in which the products or services are provided to Sembcorp.

3.5 Environment

We expect all Suppliers, across their operations, products and services, to minimise their environmental impact, in line with our Group Health, Safety, Security and Environment Policy Statement.

Resource consumption, pollution prevention and climate change mitigation

Suppliers should demonstrate that they are managing, measuring and minimising the environmental impact of their operations, including reductions in emissions (including greenhouse gas emissions), waste, energy consumption and water usage.

Environmental standards and regulations

Suppliers are required to comply with all applicable corporate and site-specific environmental standards when conducting work on Sembcorp sites.

4. Non-Compliance with this Code

Failure to comply with the requirements set out in this Code may adversely affect a Supplier's ability to commence or continue a business relationship with Sembcorp. Suppliers are required to promptly notify Sembcorp of any suspected or actual non-compliance with this Code.

Sembcorp is committed to working with Suppliers, where practicable, to address non-compliance through appropriate corrective and remedial actions and to implement measures to prevent recurrence. Notwithstanding this, Sembcorp reserves the right, at its discretion, to suspend or terminate its business relationship with any Supplier that fails to comply with this Code or does not take adequate steps to address identified non-compliance.

Any individual or entity with serious concerns about practices inconsistent with this Code may make a confidential report through the following channels:

- **Telephone:** (+65) 6723 3220
- **Email:** gia.cases@sembcorp.com
- **Whistleblowing portal:** <https://wbportal.sembcorp.com>

Sembcorp will handle all reports in an impartial, fair, and confidential manner. All reports will be taken seriously and investigated in accordance with Sembcorp's established processes. Suppliers are expected to cooperate fully in any such investigation. Where a breach is substantiated, Sembcorp will take appropriate remedial or corrective action.

5. Acknowledgement

Acknowledgement of this Code during our Supplier on-boarding process is a prerequisite for doing business with Sembcorp. By providing goods and services to Sembcorp, the Supplier confirms it has read, understood and agrees to comply with the Code.

6. Relationship with Other Documents

This Code is incorporated by reference into the contract entered into between Sembcorp and the Supplier, including Sembcorp's General Terms & Conditions (if applicable) (the "**Contract**"). Compliance with this Code is a contractual obligation of the Supplier. In the event of any inconsistency or conflict between the provisions of the Contract and this Code, the provisions of the Contract shall prevail.