

SUPPLIER CODE OF CONDUCT



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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 aims to deliver superior services to its customers and society as a whole, in collaboration with its Suppliers. To achieve this goal, ComfortDelGro requires its Suppliers to operate in

accordance with this Supplier Code of Conduct (“Code”) and in full compliance with all applicable laws and regulations, maintain high ethical standards, have clear health and safety policies and strict environmental policies, and adopt fair employment practices.

Suppliers are responsible for ensuring that their employees, representatives, contractors and other business partners understand, comply and act consistently with this Code. This Code sets out ComfortDelGro’s minimum expectations of its Suppliers, and their supply chain. Failure to comply with this Code may result in disqualification from consideration for business, and/or future business, with ComfortDelGro.



1. Compliance with Laws

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](#).

2. Business Practices and Ethics

2.1. Use of Fair Business Practices

Suppliers must practise fair competition in accordance with local antitrust and competition laws. Suppliers must not engage in any acts of collusion, price fixing, predatory pricing or other anti-competitive practices. Commercial decisions, including prices, terms of sale, division of markets and allocation of customers, must be made independently and without communication with competitors.

2.2. Anti-Corruption

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.

2.3. Anti-Fraud


Likewise, [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](#).

2.4. Tax Evasion

[ComfortDelGro](#) holds itself and its Suppliers to the highest ethical standards. We strictly prohibit any form of facilitation of tax evasion. We expect our Suppliers to comply with all applicable laws, regulations, codes, and sanctions relating to the prevention of tax evasion. Under no circumstances shall any Supplier or person associated with the Supplier's business knowingly become involved with, or take steps with a view to, assisting another person to fraudulently evade tax.

2.5. Gifts and Entertainment

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



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

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.

Suppliers must 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 [ComfortDelGro](#) or any person or organisation with whom [ComfortDelGro](#) may have business dealings.

2.6. Conflicts of Interest

Suppliers must 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](#).

2.7. Social Media

[ComfortDelGro](#) expects all Suppliers to use social media platforms in a responsible and professional manner that aligns with ethical standards and promotes positive engagement.

Suppliers shall take measures to protect the reputation and brand image of [ComfortDelGro](#) when engaging in social media activities and refrain from making false or misleading statements, defamatory comments, or engaging in any activity that may harm the reputation of [ComfortDelGro](#) or its stakeholders.

2.8. Record Keeping and Documentation

[ComfortDelGro](#) recognises the utmost importance of comprehensive and accurate record-keeping. Suppliers are expected to maintain true and accurate records of all financial transactions and information regarding their business in accordance with applicable laws, policies and procedures.

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 and the United Nations' Global Compact's Principles on Human Rights in aspects of our employment practices as well as Workplace Health and Safety. ComfortDelGro's Human Rights Policy is available [here](#).

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

3.2. Modern Slavery

ComfortDelGro has a zero-tolerance approach to modern slavery and is committed to implementing and enforcing effective systems and controls to comply with its commitments under modern slavery laws. Suppliers must implement measures to ensure there is no form of modern slavery, including forced labour, human trafficking, debt bondage, and child labour, within their operations and supply chains.

Suppliers shall comply with all applicable laws, regulations and international standards concerning modern slavery and/or human trafficking.

3.3. 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 exploitation or abuse, verbal intimidation, psychological harassment, coercion and corporal punishments are not tolerated.

Suppliers shall educate their employees on the types of behaviour that constitute harassment and abuse, the consequences of such behaviour and the channels available to report such incident.

3.4. Non-Discrimination

Suppliers shall commit to a workforce and workplace free of unlawful discrimination. 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 or health status of workers, culture, sexual orientation, gender identity, or other characteristics protected by applicable laws and regulations.

3.5. Ethical Employment

Suppliers must align their employment practices with all applicable laws, regulations and standards concerning recruitment and employment practices, including those relating to minimum wage, minimum age, working hours, overtime work, employment benefits and living conditions for employees. Suppliers' employees should not be compelled to work excessive overtime, and they must be provided with rest periods and days off as required by law.

Suppliers shall follow good recruitment practices such as establishing written employment contracts that clearly set out the employment terms, including no charging of recruitment fees and no deposit requirement for migrant workers.

3.6. Freedom of Association and Collective Bargaining

Suppliers shall recognise and respect their employees' freedom of association, including the right to join trade unions or employee associations of their choice. Suppliers shall not interfere with their employees' rights to collectively bargain or engage in peaceful assembly.

3.7. Freedom of Movement and Personal Freedom

Suppliers shall not unreasonably restrict the freedom of movement of their employees. Suppliers shall not use any coercive means to restrict the freedom of movement or personal freedom of their employees.

4. Workplace Health, Safety and Quality

4.1. Healthy and Safe Working Environment

At [ComfortDelGro](#), we recognise that a healthy and safe work environment is built upon a foundation of knowledge, awareness and continuous improvement. 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 prevent work-related accidents, injuries and occupational illnesses. For example, protective equipment and tools must be provided and replaced/maintained regularly.

Suppliers shall ensure that their employees are provided with health and safety trainings based on their roles and responsibilities. This includes training on safe work practices, proper use of equipment, emergency responses, hazard identification and regular refresher courses to keep their employees updated on the latest best practices and regulatory requirements.

4.2. Safety

The safety of all goods and services supplied must be ensured through appropriate policies, implementation and monitoring. Suppliers must ensure that their goods and services meet all necessary safety standards and regulations. The goods must be free from defects that could pose a risk to health or safety, and they must be designed, manufactured, labelled, and packaged in a manner that minimises potential hazards.

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](#). Suppliers shall put in place robust quality assurance and control processes to ensure the consistency, reliability, and performance of their goods and services. This includes implementing quality management systems, conducting regular inspections and testing, and implementing corrective and preventive actions to address any identified issues.

5. Corporate Social Responsibility and Environmental Management

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 the area of Corporate Social Responsibility.

5.2. Environmental Management

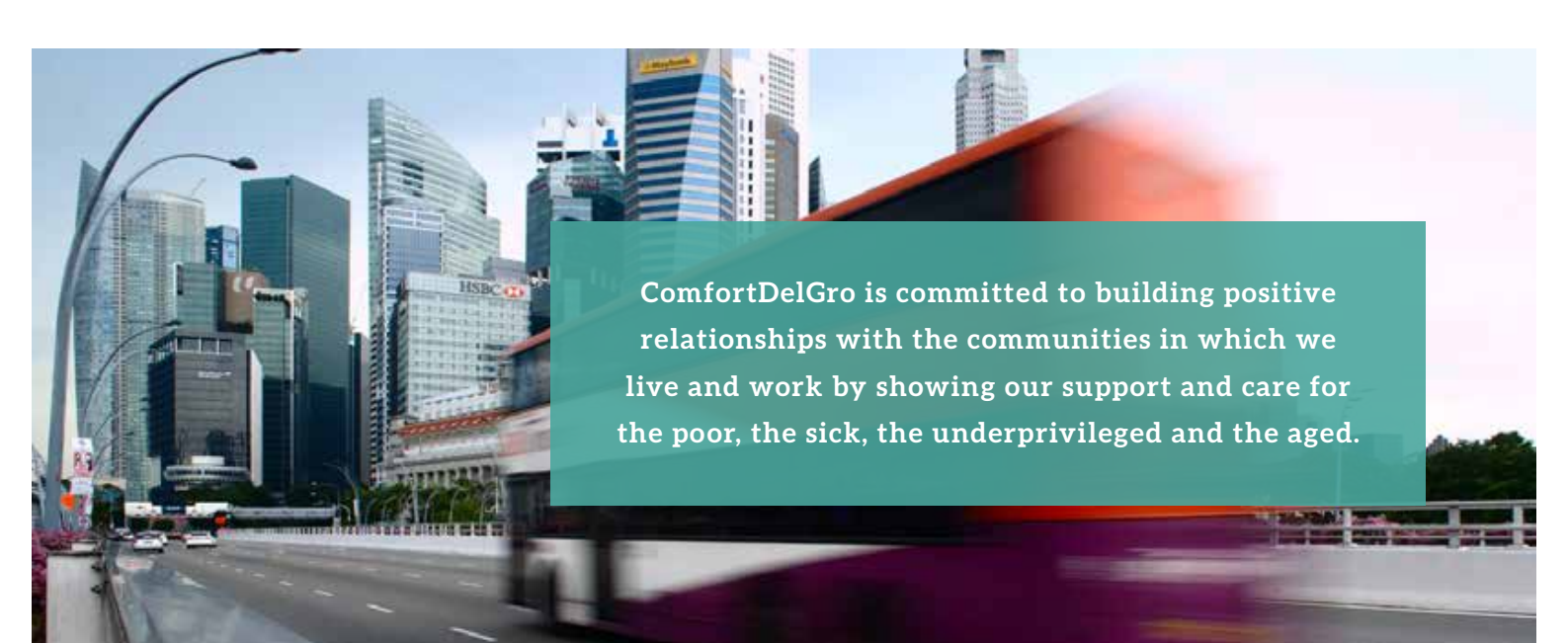
Suppliers must endeavour to minimise the impact of their operations on the environment, and are encouraged to adopt effective environmental management practices and standards. This includes striving for the responsible and efficient consumption of resources, avoidance of deforestation, and avoidance of biodiversity loss. [ComfortDelGro's Biodiversity Policy](#) is available [here](#). 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 their greenhouse gas emissions from their operations. This includes adoption of eco-efficient practices and green technologies and transitioning to cleaner energy.

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 are they allowed to pass such information to others.



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.

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 their obligations to [ComfortDelGro](#) must first be authorised by [ComfortDelGro](#).

6.3. Personal Data

Suppliers 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

Suppliers shall ensure adequate communication to and compliance of this Code by their employees and supply chain. Where needed, Suppliers shall ensure appropriate 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 them 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 their facilities and operations, and to extend such checks to their supply chain. It is the Suppliers' responsibility and obligation to inform [ComfortDelGro](#) in a timely manner of any alleged, threatened or actual breach of this Code.

8.2. Corrective Action Process

ComfortDelGro will, where appropriate, work with Suppliers to ensure they achieve an improved performance in each of the areas outlined in this Code. Suppliers are expected to self-assess their compliance with the Code and take timely action to address any non-compliance. A corrective action plan should be developed and promptly implemented to address the identified non-compliance and prevent reoccurrence. Suppliers shall monitor and evaluate the effectiveness of the corrective actions over time and make necessary adjustments or implement additional actions, if required, to prevent future reoccurrences.

8.3. Due Diligence

ComfortDelGro reserves the right to conduct due diligence checks and audits on Suppliers for compliance with this Code. Suppliers may be required to provide relevant policies and procedures, access to employees and other personnel, as well as associated evidence, to demonstrate compliance.

9. Reporting

9.1. Protection of Identity and Non-Retaliation

ComfortDelGro does not tolerate any retaliation or retribution for reporting any ethical concerns, under this Code or otherwise and expects the same of its Suppliers. Accordingly, Suppliers are expected to implement effective reporting mechanisms that ensure confidentiality and prohibit retaliation.

9.2. ComfortDelGro Alert Line

Suppliers are encouraged to raise any grievances or report any actual or suspected violations of the Code:

- (a) via the [ComfortDelGro Alert Line](#) listed in the [ComfortDelGro Whistle Blowing Policy](#) for countries other than Australia;
- (b) via the whistleblower hotline listed in the [ComfortDelGro Corporation Australia Whistleblower Policy](#) for Australia.

10. Further Information

For questions or concerns about this Code, please contact the [ComfortDelGro Procurement](#) representative in your respective country.