

## SUPPLIER CODE OF CONDUCT

### INTRODUCTION

Stamford Land Corporation Ltd ("**Stamford**") is Australasia's largest independent owner-operator of luxury hotels.

As the leading luxury hospitality provider and property developer in Australasia, Stamford (also referred to in this document as "*we*" or "*our*") aims to (i) have procurement practices that are ethical; (ii) be environmentally and socially responsible; and (iii) stand guard against corruption and fraud. As a purchaser of products and services, we also aim to reduce adverse impacts and identify opportunities within our supply chain to drive positive social and environmental change.

In all instances, we expect adherence to our Core Values, namely:

- Can-do Attitude
- Recognise and Respect
- Eye for Detail
- Discipline
- Ownership

Accordingly, we require all Suppliers (as defined below) to comply with this Supplier Code of Conduct ("**Code**") and all applicable laws, rules and regulations in all locations where they conduct business. We also expect that our Suppliers (i) communicate these principles to their own contractors and vendors; and (ii) encourage their own contractors and vendors to incorporate these principles into their business policies and practices.

For purposes of this Code, "**Supplier**" means any company, corporation, entity or individual - including their employees, subcontractors, agents, and other representatives - that sells, or seeks to sell, goods or services to or through Stamford or any of Stamford's subsidiaries, affiliates or associates, either directly or indirectly.

### 1. COMPLIANCE WITH LAWS AND REGULATIONS

Suppliers shall comply with applicable laws, rules and regulations relating to their activities in the countries in which they operate. Where there are differences or conflicts between this document and local law, the higher standard should prevail.

Suppliers shall notify Stamford immediately of any violation of applicable laws, rules and regulations that may affect their ability to supply products or services to the Stamford Group ("**Group**") in accordance with this Code.

### 2. ETHICAL BUSINESS PRACTICES

Stamford expects its Suppliers to conduct their business in a lawful, fair and ethical manner. Suppliers shall adhere to a high ethical standard, and ensure integrity, transparency and conformance with applicable laws and the standards of this Code.

Suppliers shall act in a manner that promotes trust by ensuring that their business conduct (including without limitation conduct related to the protection of trade secrets and intellectual property) contributes to credible, stable and sustainable business relationships.

### **3. ANTI-CORRUPTION AND ANTI-MONEY LAUNDERING (“AML”) COMPLIANCE**

Any and all forms of corruption and bribery are strictly prohibited. Suppliers must comply with all applicable anti-corruption laws, rules and regulations of the country where their businesses are being conducted.

Suppliers shall not engage in any form of corrupt practices, including but not limited to extortion, fraud, or bribery. Suppliers must not offer or accept bribes or other means of undue or improper advantage. Suppliers should observe local customs with respect to gifts, although the value of such gifts should not be material enough to influence business decisions or violate applicable laws, rules or regulations.

Suppliers will conduct their businesses without engaging in any corrupt practices, including giving, receiving, authorising or promising bribes or kickbacks.

Supplier shall commit to combatting money laundering and comply with all applicable laws, rules and regulations concerning AML efforts.

### **4. COMMUNITY INVOLVEMENT**

Stamford seeks to work with suppliers that partner with local governments and communities to improve the educational, cultural, economic and social well-being of the communities in which they live and serve.

Suppliers are encouraged to engage with, promote and contribute to the communities in which they operate to help foster social and economic development and sustainability.

### **5. ENVIRONMENTAL GUIDELINES**

Stamford seeks suppliers who share our commitment to protecting the environment. Suppliers shall adopt appropriate environmentally friendly practices to minimise negative environmental impacts of their operations, products and services through measures such as proper waste management, pollution control and recycling, while continually advancing the sustainability of the products and services provided to Stamford.

Stamford favours suppliers that work to sustain, protect and restore the environment, by means such as energy conservation, recycling and proper disposal of waste, as well as by environmental restoration.

We expect Suppliers to minimize waste and implement policies and procedures to properly dispose of all types of waste, including water, energy, raw materials and processed materials.

### **6. LABOUR STANDARDS AND PRACTICES**

Suppliers must comply with all applicable laws, rules and regulations relating to working hours, days of rest, overtime, wages, benefits, minimum age, working conditions, occupational health and safety, and industrial relations.

No Supplier shall engage in, permit or tolerate (i) the use of indentured, slave, or bonded labour; (ii) other forms of slavery; or (iii) other forced involuntary labour.

Stamford requires its Suppliers to uphold a commitment to basic principles of human rights. Suppliers must prohibit discrimination in hiring, promotion, salary, performance evaluation or any other term or condition of work, on the basis of race, colour, national origin, gender, gender identity, sexual orientation, religion, disability, or any other basis prohibited by law in the applicable jurisdiction.

We encourage Suppliers to demonstrate a commitment to diversity and inclusion, including in relation to gender, gender identity, sexual orientation, disability and cultural diversity.

Stamford firmly believes that everyone should be treated with dignity and respect. Suppliers shall treat each of its employees with respect and dignity, and shall not subject or threaten to subject any employee to physical, sexual, psychological or verbal harassment or abuse.

Suppliers must prohibit and not condone the use of physical, verbal, sexual or psychological harassment, abuse or other forms of intimidation of workers.

## **7. HEALTH AND SAFETY GUIDELINES**

Suppliers shall uphold a safe and healthy work environment. Suppliers shall comply with all laws, rules and regulations governing employee occupational health and safety in the jurisdiction where they operate.

Suppliers must-

- (i) comply with all applicable health and safety laws and regulations relating to their products, services and operations;
- (ii) provide workers and visitors with a safe and healthy working environment and maintain safe systems of work; and
- (iii) provide workers with appropriate tools, equipment and training to carry out their duties.

## **8. PRIVACY AND DATA PROTECTION**

Suppliers must comply with all relevant data protection, privacy, cybersecurity and information security laws, rules and regulations (collectively, “**Data Protection Laws**”) when dealing with any personal information relating to the Group or any of the Group’s customers, guests or employees.

Suppliers shall promptly notify us in the event of any unauthorised disclosure, leakage, or use of personal data (“**Data Incident**”) and work with us in good faith to mitigate the impact of any Data Incident on the Group and the Group’s customers, guests and employees, in compliance with applicable Data Protection Laws.

## **9. INTELLECTUAL PROPERTY RIGHTS**

Suppliers shall respect intellectual property rights and manage technology and know-how in a manner that protects intellectual property rights.

Suppliers shall recognise and respect the Group's intellectual property rights including the Group's trademarks, copyright, design rights and patents. Suppliers shall not engage in any activities that may infringe upon any of the Group's intellectual property rights or tarnish the Group's reputation.

#### **10. SECURITIES AND INSIDER TRADING**

If, during the course of its work for Stamford, a Supplier has access to material confidential information, it must not use or share that information in any way to trade or enable others to trade the securities of Stamford.

#### **11. TRADE AND EXPORT/IMPORT**

Suppliers must conduct their business in line with applicable (i) trade controls; and (ii) export, re-export and import laws and regulations.

#### **12. COMPLIANCE AND NOTIFICATION**

Suppliers should take appropriate steps to ensure that the principles of this Code are communicated to their employees and throughout their own supply chains. Suppliers should also take appropriate steps to ensure that the principles of this Code are adopted and applied by their employees, suppliers, contractors, subcontractors, agents and representatives to the extent applicable.

Suppliers must monitor compliance with this Code and notify us as soon as reasonably practicable of any actual or suspected breach. Suppliers must take prompt and reasonable steps to address, remedy and prevent repetition of any breach.

Stamford holds each of its Suppliers accountable for ensuring compliance with this Code, and may request that a Supplier demonstrate such compliance to the satisfaction of Stamford.

We reserve the right to:

- (i) verify compliance with this Code and require Suppliers to cooperate and provide reasonable supporting evidence. This may include (a) Supplier's completion of self-assessment questionnaires, fulfilling requests for further information and documentation; and/or (b) site visits or audits by us or our agents; and/or
- (ii) terminate our business relationship with the Supplier in the event of ongoing or repeated breaches.

Suppliers must ensure that there is no sub-contracting of material obligations, unless approved by us.

We may amend this Code from time to time for any reason, including to reflect legal and regulatory changes or changes in industry best practice.

If a Supplier has any concerns regarding the ethics of its relationship with Stamford or any actual or suspected breach of this Code, it should contact us at [Whistleblower@stamfordland.com](mailto:Whistleblower@stamfordland.com).

*[As of 9 May 2023]*