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## VENDOR CODE OF CONDUCT

### STATEMENT OF POLICY

This Vendor Code of Conduct (“**VCOC**”) describes the standard of business practice that applies to all Vendors of APL Logistics Ltd and its subsidiaries (collectively referred to herein as “**APLL**”). APLL sources products and services on a worldwide basis, and we recognize that doing so responsibly can positively influence not just our own operations but also those of our customers and vendors. We appreciate that regulations and best practices vary across the globe, but there are a number of minimum standards of conduct and integrity that we expect to be achieved by all Vendors as further described in this Policy. By “**Vendor**”, APLL means any company, corporation, firm or individual that provides products or services to, or acts on behalf of, APLL and/or APLL’s customers. This includes, without limitation, the Vendor’s employees, agents and sub-contractors.

### GENERAL PRINCIPLES AND STANDARDS OF CONDUCT

Our business success and relationships are built upon a culture of excellence and commitment, which in turn rest on the foundations of integrity, trust and respect for individuals and the law. APLL’s policy is to select Vendors that can supply the products and services we need while not exposing our employees, their employees or the local environment to undue risks. The principles of conduct which we expect of our Vendors are further explained below:

#### (I) COMPLIANCE WITH LAWS

All Vendors shall conduct their business activities in full compliance with the applicable laws, international conventions and/or regulations of their respective countries and operating locations.

- 1. Competition & Antitrust Laws** Vendors shall conduct business in full compliance with applicable antitrust and fair competition laws. Vendors shall not engage in unlawful agreements or understandings that improperly limit the supply or affect the price of goods or services provided to, or offered by, APLL.
- 2. Anti-Corruption, Anti-Bribery** Vendors shall comply with all applicable anti-corruption and anti-bribery laws and APLL’s [Anti-Bribery Policy](#). Vendors and their employees and other representatives must not give or offer to give, anything of value, or make any improper payments, directly or indirectly, to any government official, employee of a government-controlled company, or political party, customer or private third party, in order to obtain any improper benefit or advantage.
- 3. Gifts & Entertainment** Vendors acknowledge that APLL’s internal policies prohibit employees from accepting anything more than occasional and modest gifts from Vendors, including meals and entertainment. Vendors are not authorized to give or receive gifts, hospitality or entertainment on APLL’s behalf.
- 4. Data Protection** Vendors shall comply with all applicable data privacy laws and regulations. Vendors who are engaged in collecting, processing or controlling personal data on behalf of APLL must comply with APLL’s corporate rules and policies relating to such services and shall prevent the improper and unauthorized use or dissemination of such data.



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- 5. International Trade Controls & Trade Sanctions** International trade control (“ITC”) laws and regulations and country-specific trade sanctions affect international transactions involving goods, services, technology and financial transactions. Vendors shall operate in full compliance with all applicable ITC laws and regulations, including but not limited to regulations issued by the United States’ Office of Foreign Assets Control. Vendors must have full and up-to-date knowledge about restrictive laws and regulations adopted against certain countries, governments, organizations, entities, companies, individuals or assets and shall not engage in business with them, where doing so is prohibited by applicable laws and regulations.
- 6. Anti-Money laundering & Counter Terrorism Financing** Vendors shall comply with all applicable Anti-Money Laundering and Counter Terrorism Financing laws and regulations. Vendors shall not knowingly participate in a scheme to launder money related to criminal or terrorist activity. Vendors shall not directly or indirectly do business with any person included on any lists of terrorists or terrorist organizations compiled by the United States or any other national or international organization. Vendors are committed to conduct business with customers and suppliers involved in legitimate business activities and whose funds are derived from legitimate sources.
- 7. Insider Trading** Vendors may not use or pass on non-published confidential information received from or obtained in connection with the work undertaken for or on behalf of APLL to buy, sell, or exercise options of shares or similar securities or to get a third party to do any of these things.

## (II) BUSINESS PRACTICES

Vendors must be committed to the highest standards of legal and business conduct when dealing with their employees, suppliers, and customers, including APLL.

- 1. APLL Property** Vendors will not convert and/or unlawfully appropriate the property of APLL, property bailed or sub-bailed to APLL and/or property belonging to APLL’s customers and/or sub-contractors.
- 2. Accurate Business Records** Vendors shall maintain accurate and timely financial and accounting records of all transactions related to their business with APLL and retain them as required by applicable law, but in no case less than 5 years. No accounting or financial entry shall be made, and no invoice or receipt shall be issued, that conceals or disguises the true nature of any transaction or record.
- 3. Confidential Information** Vendors shall protect APLL’s confidential information (including information stored in physical and online or electronic formats) and shall not share them with any third party unless authorized to do so in writing by APLL.
- 4. Intellectual Property** Vendors shall protect APLL intellectual property in a manner consistent with the law and respect valid trademarks and patents.
- 5. Honest & Legal Conduct** Vendors undertake not to engage in any conduct which would, under any applicable law, constitute willful misconduct, a criminal offence and/or tortious deceit.

## (III) ETHICAL PRINCIPLES AND CONFLICT OF INTEREST

Vendors shall conduct their business in a manner to conform to the highest level of ethical business behavior. Vendors will not engage in any unfair practices or any conflict of interest or appearance of conflict of interest in all their dealings. Vendors shall promptly disclose any potential or actual conflict of interest to APLL in writing; to the extent that no declaration is made, Vendors will be deemed to have confirmed that no such conflict exists.



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#### **(IV) HEALTH AND SAFETY**

APLL prioritizes zero harm to people and the environment. Vendors shall provide a safe and healthy working environment for their employees. Vendors shall maintain and enforce anti-drugs and alcohol policies.

#### **(V) LABOUR**

Vendors shall comply with (and shall strive to exceed) all applicable labor laws, including but not limited to those relating to wages, working hours, and conditions. Vendors will not use labor derived from slavery, servitude, forced, bonded, involuntary prison, human trafficking or child labor. Vendors shall respect all applicable laws, regulations, and international standards related to the protection of human rights and will ensure fair treatment. Vendors shall commit to a workplace free of harassment and abuse.

Vendors shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring or other employment practices such as promotions, rewards, and access to training.

#### **(VI) ENVIRONMENTAL COMPLIANCE**

Vendors shall operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment and shall comply with all applicable environmental regulations. Vendors shall obtain and maintain all necessary environmental permits, approvals, and registrations and shall commit to proactively undertake initiatives to protect the environment from harm and degradation in relation to their operations.

Vendors shall strive to set 2025 and 2030 absolute emissions reduction targets by the end of 2023 to aid in APLL's Scope 3 data collection and baselining. Vendors shall seek to align these emissions reduction goals with those approved by the Science Based Targets initiative. Vendors shall innovate and provide suggestions in order to support APLL's commitment to utilizing renewable energy, alternative fuel, and emerging sustainable technology to minimize emissions and to meet stated targets.

Vendors commit to supporting APLL in local outreach programs that benefit the ecosystems and communities in which APLL operates. Vendors will properly segregate, manage, transport, and dispose of all waste and hazardous materials in compliance with applicable laws and regulations. Vendors will demonstrate a consistent, effective, and legally compliant approach for chemicals management.

#### **(VII) VENDOR MANAGEMENT**

All Vendors shall maintain appropriate and meaningful compliance policies and programs consistent with this VCOC, including but not limited to policies relating to data privacy, antitrust, anti-bribery and anti-money laundering. Vendors will be required to acknowledge in writing that they understand and will comply with this VCOC, and upon request will certify in writing that they have so complied.

Where appropriate APLL is prepared to work with Vendors to achieve collaborative relationships for the benefit of both businesses. We welcome, rather than penalize, Vendors who strive to identify areas of non-conformance and develop proactive plans to achieve compliance, APLL shall have the right to audit Vendors' compliance upon reasonable notice, and Vendors shall extend full cooperation to APLL in such event.

#### **(VIII) APLL ETHICS REPORTING RESOURCE**

If you wish to report questionable behavior or a possible violation of this VCOC, you are encouraged to work with your primary APLL contact to resolve your concern. If that is not feasible, please contact APLL by sending a letter to the General Counsel, APL Logistics Ltd, 128 Beach Road, #08-02 Guoco Midtown, Singapore 189773.



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APLL will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation against any individual who has, in good faith, sought out advice, reported questionable behavior, or reported a possible violation of this VCOC.

**(IX) CONSEQUENCES OF BREACH**

In the event that the Vendor is in breach of any term of this VCOC, APLL shall have, at its sole option, and without prejudice to APLL's other rights and remedies of law and of equity, the right to terminate the contract(s) with the Vendor upon written notice to the Vendor.

**(X) TRANSLATION**

This VCOC may be translated into other languages to facilitate familiarization and understanding by Vendors worldwide. In the event of any discrepancy between the original English version and any translation, this English version shall prevail.