

Hutchison Ports (UK) Limited ("HPUK" or the "Group") SUPPLIER CODE OF CONDUCT (the "Code")

Introduction to HPUK

HPUK combines The Felixstowe Dock and Railway Company (trading as Port of Felixstowe), Harwich International Port Limited, Thamesport (London) Limited (trading as London Thamesport) and other related companies of Hutchison Ports in the UK. It strongly encourages sound environmental standards, social well-being and governance practices amongst its business partners and suppliers. This Code sets out the expectations HPUK has of its business partners and suppliers on compliance with the law, labour and human rights, ethics, health and safety, and the environment.

The Group's business partners and suppliers are expected to disseminate the requirements of this Code to their employees, agents, sub-contractors and suppliers and hold them accountable for any non-conformance.

Compliance with Law

The supplier's activities and its employees shall operate in full compliance with the laws of their respective countries. In addition to this the supplier when conducting business with HPUK shall comply with all relevant aspects of English Law.

The supplier shall ensure that all products, services and shipments adhere to all applicable international trade compliance laws, rules and regulations.

Labour and human rights

Human rights are at the centre of HPUK's business and it does not undertake business activities with any supplier that violates the standards and principles of basic human rights. HPUK expects its suppliers to uphold the human rights of employees and treat them with respect and dignity at all times and provide them with a fair and ethical workplace. Suppliers shall have established and enforced policies, standards and conditions to ensure a fair and equitable workplace environment that is free from harassment or discrimination as set out below:

- **Anti-discrimination:** a supplier shall recruit an employee on their ability to complete the work and shall not discriminate against any employee based on age, gender, disability, ethnicity, marital status, national origin, political affiliation, race, religion or other characteristic.
- **Anti-harassment and abuse:** a supplier shall provide a working environment that is free from harassment and abuse. The supplier shall not threaten an employee with verbal abuse and harassment, psychological harassment, mental or physical coercion or sexual harassment. Acts of harassment between employees shall be dealt with by the supplier in a professional and appropriate manner.
- **Human rights:** respect for human rights is a fundamental part of HPUK's business practice and it does not undertake business with suppliers that do not apply standards and principles of basic human rights.

- **Child labour:** a supplier shall not use child labour and shall respect laws around minimum age of its employees.
Young employees: HPUK encourages suppliers to participate in legitimate workplace apprenticeship programmes that comply with all applicable laws and regulations. Young employees must be protected from work which is likely to be hazardous or harmful to their health, physical or mental development.
- **Forced labour:** a supplier shall not use any involuntary or forced labour including indentured, bonded, slave or human trafficked labour.
Employees shall be free to terminate their employment in accordance with applicable laws, rules and regulations. A supplier shall not hold employee's original government issued identification and travel documents. The supplier shall request copies of such documents. A supplier shall ensure that the conditions of employment are issued under a written employment contract. Provision of such must be in a language that can be read and understood by the employee. A supplier shall ensure that any third party recruitment or other agency that it uses in provision of the goods or services supplied to HPUK are compliant with the provisions of the law and this code. Suppliers recruiting foreign contract employees either directly or through an agency shall be responsible for payment of all applicable fees.
- **Wages and Benefits:** a supplier shall communicate a pay structure and pay periods to all employees, pay accurate amounts in a timely manner and wage deductions shall not be used as a disciplinary measure. A supplier shall pay all employees at least the minimum legal wage (and where appropriate the national living wage) and provide all legally mandated benefits. In addition to regular paid hours, a supplier must pay employees for all additional overtime hours at such a rate as agreed in their contract of employment or minimum legal premium rate. A supplier shall offer annual leave (holiday), leave periods and time off for legally recognised holidays.
- **Working Hours:** a supplier shall set out the working times within the employment contract, where an appropriate number of rest days are provided. Suppliers shall comply with all applicable laws, rules and regulations in respect of working hours and overtime must be voluntary.
- **Freedom of association and collective bargaining:** HPUK recognises the importance of open communication and direct engagement between employees and management and expects its suppliers to do the same. A supplier shall allow its employees to associate with others, form and join organisations, including trade unions, work councils or health and safety committees of their choice and bargain collectively without interference, discrimination, retaliation or harassment. In the absence of formal representation, a supplier shall ensure that an employee has the mechanism to report grievances and facilitates open communications.

Ethics

Business integrity: any supplier providing goods or services to HPUK shall abide by all anti-bribery and anti-corruption laws and regulations of the countries in which it operates. It shall have established and enforced written policies, procedures and systems to avoid any form of corruption and bribery and to promote ethical standards. It shall ensure that training is provided to its employees and updated at regular intervals. HPUK will never offer, give or receive bribes, improper payments or participate in any kind of corrupt activity and shall expect any supplier it engages with to act in the same manner.

HPUK provides clear guidance to its employees through internal policy and training materials. Engaging in bribery and corruption and making facilitation payments can seriously damage reputations and our business relationships. Hospitality in the normal course of business is acceptable.

- **Conflicts of interest:** these occur when private interests interfere, or appear to interfere, with the best interest between HPUK and the supplier. Where a family or friendship relationship is present between employees of HPUK and the supplier they shall disclose this fact to HPUK.
- **Disclosure of information:** the supplier shall accurately record its business activities and when required to do so provide access to the appropriate authorities.
- **Whistle blower protection:** the supplier shall provide a confidential, safe and secure process within its business to provide its employees or its suppliers the mechanism to report workplace grievances and shall prohibit retaliation.
- **Community engagement:** HPUK supports and contributes to the social and economic wellbeing of the communities it works in, it liaises with the local community, addresses concerns and when possible mitigates these. The supplier is encouraged to help nurture social and economic development and contribute to the sustainability of the communities in which it operates.
- **Responsible sourcing:** HPUK is aware of its responsibilities to carry out its procurement activities in an environmentally and socially responsible manner. In accordance with its Environmental Policy, Energy Policy and Purchasing Policy HPUK strives to incorporate environmental and social considerations into its services. HPUK encourages our suppliers and contractors to act in an environmental and socially responsible manner.
- **Confidential information and records:** any information in relation to HPUK's business activities or its employees afforded to a supplier shall be marked as strictly confidential if it is not already publicly available. Where HPUK and a supplier hold a contractual agreement, the terms of such shall be adhered to.
- **Selection of suppliers and service providers:** HPUK operates an approved supplier database whereby supplier selection is based on a set of predetermined criteria, this criteria includes but is not limited to company information, financial information, statements in relation to anti-bribery and anti-corruption, accreditations and qualifications. Supplier information is requested and must be completed in full.

Health and Safety

HPUK operations are never so urgent that time cannot be taken to conduct them safely. The health, safety and welfare of our employees, visitors and contactors is paramount and the provision of an adequate risk management system and compliance with the Health and Safety at Work Act 1974, its Regulations and associated guidance is essential. Suppliers are expected to provide and maintain a safe working environment and integrate health and safety management practices into its business, reinforcing those practices through adequate supervision, information, instruction and training of its employees and others who may be affected by their work activities. The supplier must acknowledge that an employee has the right to refuse to work in unsafe conditions.

- **Occupational Health and Safety Risk Management :** a supplier shall identify, evaluate and manage occupational health and safety risks by undertaking adequate risk assessments which identify control measures that eliminate and where this is not possible control, so far as is reasonably practicable, those risks. Control measures should be implemented according

to the hierarchy of controls i.e. elimination, engineering controls, administrative measures and finally Personal Protective Equipment (“PPE”). Where it is not possible to control the risk by other means the supplier shall provide an employee with the necessary PPE and instruction on its proper use. The supplier shall ensure that PPE is worn by providing refresher training and undertaking periodic checks to ensure compliance.

- **Risk control measures:** a supplier must ensure that they have an adequate system to monitor the effectiveness of their risk control measures and where necessary take steps to ensure that they continue to control risk to an adequate standard.
- **Emergency response:** a supplier shall ensure that they have adequate emergency plans and response procedures that minimise harm to employees, third parties, the environment and property should an incident occur.
- **Incident Management:** a supplier shall have a reporting system so that employees can report health and safety incidents, as well as a system to investigate, track and manage such incidents. Where an investigation indicates that there are shortcomings in a supplier’s risk control measures that supplier shall implement corrective actions that mitigate the risk. Where injury has occurred a supplier shall provide access to all necessary medical treatment and facilitate the employee’s return to work.
- **Ergonomics:** a supplier shall identify, evaluate and mitigate risk and exposure when an employee’s job role or individual tasks poses an ergonomic risk. The supplier shall ensure that workstations, environments, manual handling tasks, tools or any such related equipment are assessed and corrective action taken where necessary. The supplier shall provide training where necessary.
- **Communications:** All health and safety communications and training shall be provided to employees in their primary language. Health and safety communications shall be verbally communicated (as deemed necessary) as well as visually displayed.

Environment

HPUK is committed to protecting the environment and works with its stakeholders to continuously assess and reduce its environmental impact. Environmental considerations are an integral part of our business practices. HPUK aims to reduce environmental damage within its control and minimise its use of energy and resources. A supplier shall develop, implement and maintain environmentally sustainable business practices, have established and enforced written policies, practices and procedures for its operations and products used which commit to minimise the consumption of energy and its carbon footprint and consider the risks posed by its activities. The supplier shall remain compliant to all HPUK policies and procedures, laws, rules and regulations and assess the value brought to its business in terms of more efficient resource consumptions and monitoring of wastage.

- **Waste management:** a supplier shall ensure the application of the waste management hierarchy as defined in the EU Waste Framework Directive recycle (where practical) to all resources including but not limited to;
 - a) Hazardous goods
 - b) Non-hazardous goods
 - c) Wastewater

Waste Management Stages	Include
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Prevention:	using less material in design and manufacture, keeping products for longer, re-use, using less hazardous materials
Preparing for re-use:	checking, cleaning, repairing, refurbishing, whole items or spare parts
Recycling:	turning waste into a new substance or product, includes composting if it meets quality protocols
Other recovery:	includes anaerobic digestion, incineration with energy recovery, gasification and pyrolysis which produce energy (fuels, heat and power) and materials from waste, some backfilling
Disposal:	landfill and incineration without energy recovery

- **Air emissions:** should be identified and controlled to reduce at source (by design) and control the impact on human or environmental health.
- **Noise Management:** should be reduced at source (by design) and noise controlled to avoid harm to health or nuisance noise to local communities.
- **Resource reduction:** the supplier should limit resource use in all aspects of their business by eliminating use where possible and avoiding the use of unsustainable resources.
- **Pollution prevention:** the supplier should ensure they eliminate pollution through good design and practices and have sufficient expertise and resource to control any unplanned releases.
- **Environmental reporting:** a supplier shall obtain, keep current and comply with all required environmental permits and registrations, regulated substance specifications and restricting the use or handling of such and remain compliant with all relevant laws, rules and regulations.

The supplier shall ensure that any person(s) working for or on its behalf are aware of:

- the importance of conformity good environmental practices.
- their roles, responsibilities and authorities in achieving the requirements of HPUK Policies and procedures.
- the benefits of improved energy and resource performance.
- the impact, actual or potential, with respect to energy use and consumption, of their activities and how their activities and behaviour contribute to the achievement of energy objectives and targets, and the potential consequences of departure from specified procedures.

Questions on this Code shall be directed in writing to the Head of Procurement, Hutchison Ports UK Limited, The Port of Felixstowe, Tomline House, Felixstowe, Suffolk, IP11 3SY