

SUPPLIER ETHICS POLICY



ComfortDelGro Group Procurement Policies & Procedure Manual



ComfortDelGro is committed to the highest standards of ethical conduct, social and environmental responsibility.

ComfortDelGro Corporation Limited and its subsidiaries worldwide (hereinafter collectively referred to as “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”), in the course of its business operations.

As such, ComfortDelGro requires its Suppliers to operate in accordance with the principles in this Supplier Ethics Policy (“Policy”) and in full compliance with all applicable laws and regulations.

Suppliers are required to adhere to all local laws (including antitrust, anti-competition, anti-corruption and anti-fraud policies), maintain high ethical standards, have clear health and safety policies, strict environmental policies, and adopt fair employment practices.

It is the responsibility of Suppliers to ensure their employees and representatives understand, comply and act consistently with this Policy. Failure to adhere to this Policy may result in disqualification from consideration for business, and/or future business, with ComfortDelGro.

1. Compliance with Laws and Regulations

1.1. Abidance with the Law

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](#).

1.2. Use of Fair Business Practices

Suppliers must practise fair competition in accordance with local antitrust and competition laws. Activities that restrict competition must be avoided. Commercial decisions, including prices, terms of sale, division of markets and allocation of customers, must be made independent of understandings or agreements with competitors.

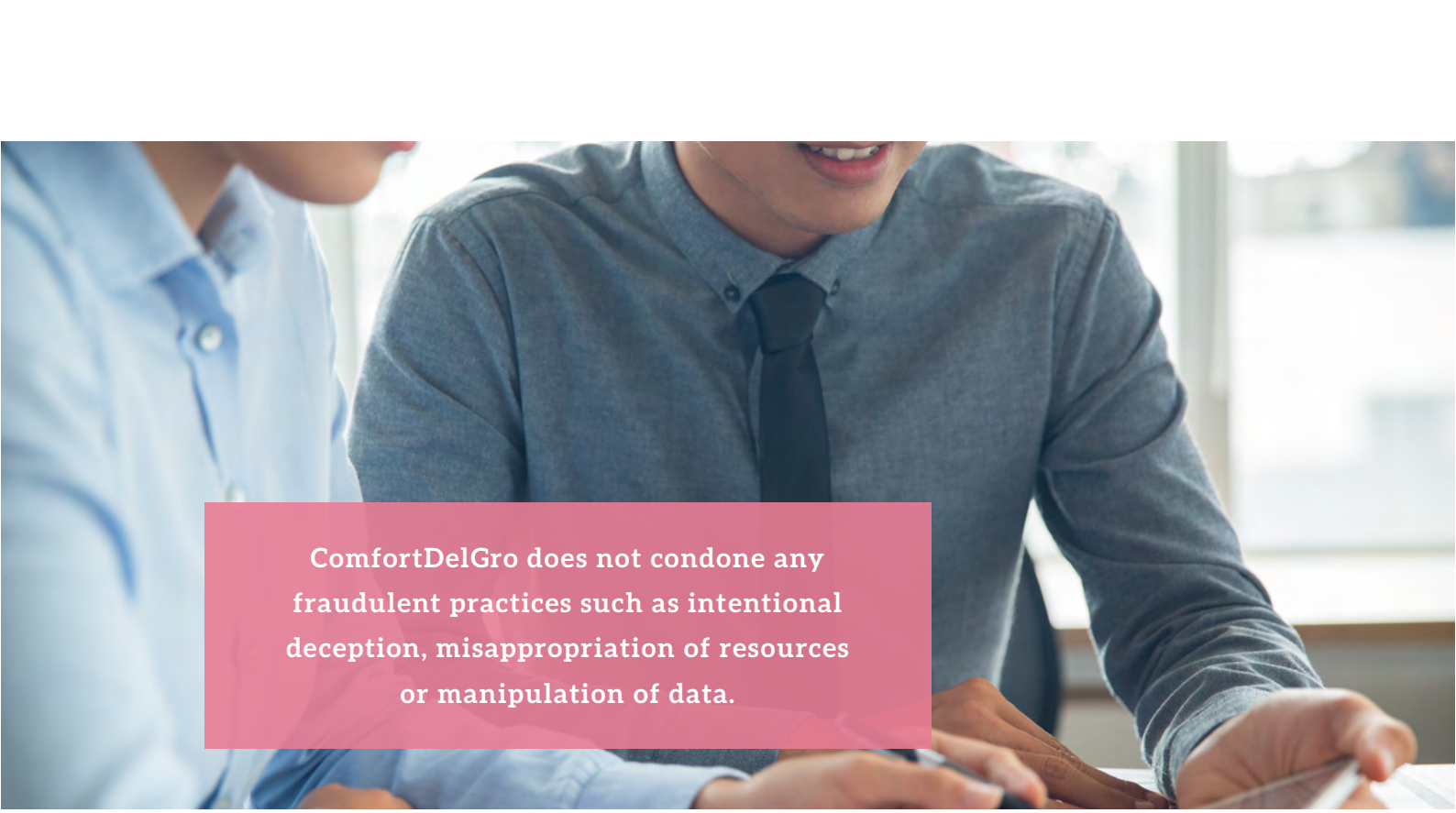
2. Ethics and Conflict of Interest

2.1. Anti-Corruption Stance

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.

2.2. Anti-Fraud Stance

In the same vein, [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](#).



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

2.3. Gifts and Entertainment

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

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. In addition, [ComfortDelGro](#) employees are prohibited from accepting initial public offering (IPO) stock from any Supplier.

Employees will respectfully 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 any person or organisation with whom [ComfortDelGro](#) may have business dealings.

2.4. Conflicts of Interest

Suppliers should seek to 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](#).

3. Workplace Health, Safety and Quality

3.1. Healthy and Safe Working Environment


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 reduce work-related injury and illness. For example, protective equipment and tools must be provided and replaced/maintained regularly.

3.2. Safety

The safety of all goods and services supplied must be ensured through appropriate policies, implementation and monitoring.

3.3. 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](#).



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.

4. Corporate Social and Environmental Responsibility

4.1. 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 area of Corporate Social Responsibility.

4.2. Environmental Responsibility

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 must endeavour to minimise the impact of their operations on the environment.

5. Non-Discriminatory & Ethical Employment

5.1. Non-Discriminatory Employment

Suppliers shall apply fair and ethical standards in their employment practices. 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, sexual orientation or gender identity.

5.2. Ethical Employment

Suppliers will comply with all national laws on wages and working hours as well as local standards regarding child labour and minimum age.

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 should they pass such information on to others.

6.2. Proprietary Information

Any information used by Suppliers in their business relationship with [ComfortDelGro](#) that is either not public and/or proprietary must be protected against loss and infringement. Any disclosure or use of such information other than for officially stated purposes must first be authorised by [ComfortDelGro](#).

7. Ethical Concerns

If any Supplier has an actual or potential ethical concern related to the Policy, they can make use of the [ComfortDelGro](#) Alert Line.

ComfortDelGro Alert Line

The ComfortDelGro Alert Line comprising the following personnel has been set up to facilitate the reporting of incidents and the handling of information or evidence on matters that will give rise to whistle blowing. You may contact:

Group Chief Internal Audit Officer

DID: +65 6383 7010

Email to: gcao@comfortdelgro.com

and/or the respective Chairmen of Audit & Risk Committee (ARC)

For ComfortDelGro Corp, email to: ARC_Chairman@comfortdelgro.com

For SBS Transit Ltd, email to: ARC_Chairman@sbstransit.com.sg

For Vicom Ltd, email to: ARC_Chairman@vicom.com.sg