



Supplier Code of Conduct

In order to achieve its social and environmental responsibilities, the Great Eagle Group of Companies (“**the Group**”) understands that it cannot rely solely on itself but must also seek the partnership and cooperation of its partners in the supply chain. As such, the Group has established the following Code of Conduct, which outlines the Group’s expectations for its suppliers. The Group will continuously review this Code of Conduct and reserves the right to add or amend requirements from time to time.

I. Ethics

A. Business Integrity

- Corruption, extortion, and embezzlement, in any form, are strictly prohibited.
- Bribes or other means to obtain an undue or improper advantage shall not be offered or accepted.
- Any international anti-corruption conventions, and applicable anti-corruption laws and regulations of the countries in which they operate shall not be violated.

B. Intellectual Property

- Intellectual property rights including but not limited to copyrights, patents, trademarks, trade secrets, technology and know-how shall be respected.

II. Labour Practices

A. Child Labour

- Child labour is strictly prohibited. No employee shall be less than the minimum age as required by the applicable law (if any).

B. Involuntary Labour

- Involuntary labour shall not be used. “Involuntary labour” is defined as work or service extracted from any person under threat, corporal punishment or penalty for its non-performance.

C. Working Hours

- Workers shall not be required to work more than the maximum number of working hours (including overtime) as permitted under the applicable law (if any).

D. Wages and Benefits

- All workers shall be provided with at least the minimum wage and benefits as required by the applicable law (if any).

E. Humane Treatment

- Corporal punishment or any other form of physical or psychological coercion or intimidation against workers shall not be used.

F. Freedom of Association

- The right of workers to associate, organise and bargain collectively in a legal and peaceful manner shall be respected.

G. Non-discrimination

- Workers shall be employed solely on the basis of their ability to do the job. They shall not be discriminated on the basis of sex, pregnancy, disability, marital status or family status.
- Workers shall not be discriminated on the above bases in relation to any hiring or employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline, and termination.

H. Workplace Health & Safety

- A safe and healthy work environment shall be provided. All applicable laws and regulations shall be fully complied with. Adequate steps shall be taken to minimise the causes of hazards inherent in the working environment.

III. Environmental Protection

A. Environmental Permits and Reporting

- All applicable laws and regulations with respect to environmental protection shall be complied with.
- Procedures for notifying local authorities in the event of an environmental accident resulting from a Supplier's operations shall be maintained.

B. Pollution Prevention

- Chemicals and other materials posing a hazard if released into the environment shall be identified and managed. Safe handling, movement, storage, recycling or reuse, and disposal of such materials shall be ensured.
- Wastewater and solid waste generated from operations, processes and sanitation facilities shall be monitored. Prior to discharge or disposal, such substances shall be controlled and treated.
- Air emissions of volatile organic chemicals, corrosives, particulates, and combustion byproducts generated from operations prior to discharge shall be characterised, monitored, controlled and treated.

C. Resource Reduction and Recycling

- The amount of natural resources (such as fuels) consumed shall be reduced.
- Processes to recycle or re-use materials wherever possible shall be identified and implemented.

IV. Management Practices

A. Monitoring of Compliance

- The Group reserves the right to conduct scheduled and unscheduled inspections of Suppliers' facilities to ensure compliance with this Code of Conduct. If requested by the Group during these visits, records for the Group's review shall be provided. If requested by the Group, interview with workers shall be allowed.

B. Corrective Action

- When violations are found, the Group and the Supplier in question will agree on a corrective action plan that eliminates the problem in a timely fashion. If it is determined that Suppliers knowingly and/or repeatedly violate this Code of Conduct, the Group reserves the right to take appropriate corrective action, including the cancellation of orders and/or termination of business with the Supplier in question.

The Group is committed to full and complete compliance with all applicable laws and regulations, and where necessary or appropriate, certain requirements beyond those mandated by local laws and regulations. The Group expects the same from all its Suppliers.