

# **UOL Group Supplier Code of Conduct**

## **1. PURPOSE**

UOL Group Limited (UOL) and its subsidiaries including Pan Pacific Hotels Group Limited and Singapore Land Group Limited and their respective subsidiaries\* (collectively referred to as the “Group”) are committed to conducting business with ethical and responsible practices. The Supplier Code of Conduct (“Code”) outlines the Group’s guiding principles for ethical and sustainable practices, reflecting the expectations it holds for its suppliers, service providers, and main contractors.

The Code aims to foster a mutually beneficial relationship that supports our environmental and social practices while generating economic value. We seek to work with suppliers who share our values, embrace the spirit and intent of our principles, and comply with all applicable laws and regulations.

## **2. SCOPE**

The Code applies to all suppliers, service providers, and main contractors involved in UOL’s value chain (the “Suppliers”) regardless of their location, volume of business with UOL, and the type of solutions they provide.

This Code formalises the commitments expected by UOL from its suppliers, service providers and main contractors in terms of business ethics and integrity, respect for human rights, environmental management, data protection and privacy, and compliance with applicable laws and regulations.

UOL will communicate this Code to all current and prospective suppliers. Where clarification is needed, we will provide additional guidance. Non-compliance with this Code may result in a review of the suppliers’ ability to continue business with UOL.

UOL will periodically review and update the Code as necessary. Any revisions will be communicated to suppliers to ensure alignment with our principles.

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\* The Code shall, where appropriate, apply to hotels owned and/or managed by the Group.

### 3. REPORTING CONCERNS

UOL welcomes feedback from any individual or organisation wishing to raise a query, report a concern, or disclose a potential breach of this Code. Suppliers are required to ensure that employees or subcontractors who report concerns in good faith are protected from any form of retaliation. You may write to us at the following address:

**UOL Group Limited (Corporate Office)**

101 Thomson Road,

#33-00 United Square,

Singapore 307591

Attention: Head, Internal Audit

(Private and Confidential)

### 4. OUR PRINCIPLES

UOL Group adheres to the following principles and expects our suppliers to do the same:

- **Business Ethics and Integrity** – Conduct all business activities lawfully, maintaining high ethical standards and avoiding bribery, corruption, or any form of fraudulent conduct.
- **Human Rights** – Promote fair treatment, create inclusive workplace, and work to prevent any form of exploitation.
- **Health and Safety** – Ensure a safe workplace for everyone, including our suppliers.
- **Environmental Management** – Act responsibly to minimise the environmental impact of our business and supply chain.
- **Data Privacy and Protection** – Ensure the secure handling of data and compliance with all relevant data privacy laws and regulations.

## **5. GUIDELINES FOR SUPPLIERS**

Suppliers to UOL Group are required to have read, understood, and comply with this Code. Suppliers must also communicate the expectations outlined in this Code to their own supply chain when delivering products or providing services to the Group.

In addition, suppliers are obligated to comply with all applicable laws and regulations concerning environmental compliance, human rights, labour practices, health and safety, business integrity, anti-corruption, and anti-bribery in the jurisdictions where they operate.

For the avoidance of doubt, the applicable laws and regulations and/or terms and conditions stipulated in the contract agreement will take precedence over this Code.

The guidelines cover five principles with further details outlined as follows:

### **5.1 Business Ethics and Integrity**

- 5.1.1** Adhere to the strict prohibition of bribery and corruption in any form; shall not request or accept, whether directly or indirectly, any gratification including any commission, discount allowances, advantage, gift, gratuity, reward, or bribe offered or promised, or consideration of any kind.
- 5.1.2** Compete fairly and in accordance with all applicable competition laws.
- 5.1.3** Safeguard and respect the intellectual property rights of UOL. Ensure any materials or documents developed for UOL are appropriately transferred, licensed, or used in accordance with all applicable legal and regulatory requirements.
- 5.1.4** Avoid actual or perceived conflicts of interest; disclose any conflict of interest to UOL immediately upon discovery.
- 5.1.5** Report any misconduct, breaches or concealment of any forbidden acts, including but not limited to fraud, corruption, bribery, data privacy, and anti-competitive behaviour to UOL Group.

- 5.1.6** Prohibit insider trading by buying or selling UOL Group or its subsidiaries shares when in possession of market sensitive information which is not publicly available.

## **5.2 Human Rights**

- 5.2.1** Integrate internationally recognised principles on human rights and labour into policies and practices, in alignment with global best practices and standards.
- 5.2.2** Comply with all applicable laws that ensure fair treatment of workers and the provision of a safe and healthy work environment.
- 5.2.3** Shall not engage in any form of modern slavery, including forced or compulsory labour, bonded labour, human trafficking, or practices that restrict freedom of movement and communication.
- 5.2.4** Adhere to all relevant local laws and regulations concerning wages and benefits in the countries of operation.
- 5.2.5** Strive to maintain an inclusive workplace free from harassment and discrimination based on characteristics such as gender, race, religion, age, or other statuses protected by local laws.

## **5.3 Health and Safety**

- 5.3.1** Comply with all applicable laws and regulations relating to health and safety.
- 5.3.2** Adhere to local and international standards, including ISO 45001 Occupational Health and Safety (OH&S) Management Systems, and ensure compliance by having applicable health and safety policies and procedures in place, where relevant and if required by UOL.
- 5.3.3** Implement measures to eliminate or reduce risks from identified hazards, fostering healthier workplaces.
- 5.3.4** Allocate adequate and appropriate resources to support safe work practices and processes.

- 5.3.5** Continually review and improve system and operations to enhance Health and Safety performance.

## **5.4 Environmental Management**

- 5.4.1** Comply with all applicable environmental laws and regulations established by local authorities.
- 5.4.2** Mitigate environmental risks and impacts associated with business operations with various methods such as encouraging sustainable resource use, implementing climate mitigation and adaptation measures, conserving biodiversity and ecosystems, and preventing pollution.
- 5.4.3** Ensure implementation with certifications such as ISO 14001 Environmental Management Systems, if required by UOL.

## **5.5 Data Privacy and Protection**

- 5.5.1** Comply with UOL's Data Protection Policy, PDPA, Acceptable Use Policy and relevant local laws and regulations, ensuring transparency in the collection, storage, processing, and sharing of data.
- 5.5.2** Implement robust measures to ensure the confidentiality, integrity, and security of confidential information shared.
- 5.5.3** Ensure implementation with certifications such as ISO 27001 Information Security Management Systems, if required by UOL
- 5.5.4** Immediately notify UOL in writing of any actual, imminent, or potential breach of obligations, including incidents of theft, loss, unauthorised access, or cybersecurity threats that could compromise UOL's proprietary information. Provide relevant details and promptly take necessary actions as required by UOL to address or prevent the breach.
- 5.5.5** Safeguard UOL proprietary and sensitive information accessed during work, ensuring all data stored on electronic or computing devices, whether owned by

UOL or the supplier, is secured and protected according to applicable data protection standards.

- 5.5.6** Restrict access to UOL's proprietary information to authorised personnel solely for contractual purposes; ensure access credentials are secured, devices used to access UOL information have password protection and security measures, and devices are locked or logged off when unattended to prevent unauthorised access.

## **6. COMPLIANCE**

- Suppliers acknowledge their acceptance of this Code and are required to convey its requirements to the companies in their value chain and ensure its compliance.
- Suppliers should strive for continuous improvement in their operations and supply chain processes.
- Suppliers grant the Group with the authority to conduct audits, with prior notification, at their premises.
- In the event of non-compliance, suppliers must implement the necessary corrective actions in a timely manner.
- Suppliers are expected to cooperate and provide necessary information regarding the sustainability aspects of their operations.
- For the avoidance of doubt, the terms and conditions stipulated in the contract agreement will take precedence over this Code.

## 7. ACKNOWLEDGEMENT

### Acknowledgement Form

We have read and acknowledge this Supplier Code of Conduct and shall apply in all dealings with UOL Group and/or its subsidiaries including Pan Pacific Hotels Group Limited and Singapore Land Group Limited and their respective subsidiaries\*. We understand that failure to sign and return this Supplier Code of Conduct Acknowledgement Form may hinder our ability to work with UOL Group and/or its subsidiaries. We will strive to ensure that our suppliers involved in any dealings with UOL Group and/or its subsidiaries will act consistently with this Supplier Code of Conduct. Should there be any concerns of non-compliance, we will highlight the concerns for discussion with UOL Group and/or its subsidiaries.

We have read and understood the expectations stipulated in the Supplier Code of Conduct and accept them:

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Designation: \_\_\_\_\_

Company: \_\_\_\_\_

Company Registration No.: \_\_\_\_\_

Date: \_\_\_\_\_

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