

## Supplier Code of Conduct

This Supplier Code of Conduct (the “Code”) outlines an ethical and behavioral framework for our suppliers/Vendors/contractors/Service Providers (herein collectively called “Suppliers”) in Pakistan and overseas. All Suppliers are required to comply with these guidelines when doing business with South Asia Pakistan Terminals Limited or its affiliates. Suppliers are expected to develop a corrective plan to bring its operations into conformance with the Code, failure to do so could result in SAPT terminating the business relationship.

### 1. Legal Requirement

Suppliers shall comply with all applicable laws and regulations of Country, which is fundamental basis of our business relationship.

### 2. Environmental Protection

- a) Suppliers shall establish an appropriate management system for Environment, Health and Safety which should also cover:
  - Abiding with all local and national environmental legislation and in a manner that ensures environmental preservation.
  - Minimization of consumption of energy and carbon footprint from operations through implementation of environmental policies and environmental systems.
  - Encouraging the use of environmentally friendly technology that can reduce energy consumption, minimize the need for business travel and reduce reliance on resources such as paper.
  - Expanding the use of environmentally friendly, recycled and / or sustainably forested products in operations.
  - Promoting the recycling of waste while taking necessary precautions and ensure compliance with legislation on the handling or disposal of any hazardous materials in operations.
- b) Suppliers shall (i) consider the risks posed to their operations from climate change (ii) actively mitigate their environmental impacts and (iii) consider the value brought to business in terms of more efficient resource consumption and monitoring of wastage.
- c) Suppliers shall periodically assess themselves and their suppliers for conformance and communicate their conformance status to SAPT when requested.
- d) Suppliers shall protect the health, safety, and the welfare of their employees, contractors, visitors, and others who may be affected by their activities.

### 3. Ethical Standards

- a) SAPTL has a ‘zero tolerance’ policy when it comes to unethical business behavior, such as bribery, corruption and forced labor.
- b) Suppliers shall act in accordance with the highest standards of ethical conduct, professionalism and being compliant with all local and national legislation to avoid all forms of corruption and bribery.
- c) Suppliers shall implement anti-corruption policies and programs, and to verify that such policies and programs are complied with.
- d) Suppliers will also establish policies, systems and practices to ensure the promotion and dissemination of with their own codes of conduct within their operations.

### 4. Labour and Human Rights

- a) Suppliers shall abide by the standards and conditions detailed below
  - Ensure a fair and equitable workplace environment that is free from any form harassment or discrimination based on but not limited to age, race or ethnic origin, disability, gender, nationality, marital status, sexual orientation, political convictions, or union affiliation.
  - Provide a work environment that pays due consideration to safety and minimizes any health hazards or harm to employees
  - Prohibit the use of forced, prison, bonded and child labour as well as any form of slavery or human trafficking and remain in compliance with all applicable minimum age legislation
  - Abide by any legislation governing minimum wage payments and where none is available ensure

that salaries are commensurate with experience and industry standards

- Comply with regulation or legislation, where applicable, on maximum working hours
- Implement clear, uniformly applied disciplinary practices and grievance procedures that include provisions prohibiting corporal punishments including mental, physical or verbal abuse
- Ensure that employees are provided with freedom of association and the right to collective bargaining. Appropriate channels shall be made available for discussion and recourse on labour related issues.
- Ensure that persons are not made to work under duress, undue influence or under any other forced conditions. SAPTL does not tolerate forced or compulsory labor and human trafficking in its supply chain. Bonded, indentured, or involuntary prison labor is not accepted as well, and suppliers must undertake comprehensive background checks on their employees to ensure compliance with applicable labor laws.

**5. Health & Safety**

- a) Suppliers shall maintain a clean, safe and healthy workplace.
- b) Suppliers should protect the health, safety, and the welfare of their employees, contractors, visitors and others who may be affected by their activities.

**6. Counterfeit Parts**

Suppliers are expected to develop, implement, and maintain effective methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products.

**7. Use of SAPTL's Name and Confidentiality**

- a) Suppliers shall undertake not to use or make any reference to SAPTL's name, directly or indirectly, in any product, Website, document, media, publication or publicity material of any kind without the prior written consent of SAPTL.
- b) Suppliers shall further undertake not to disclose or make available in any form to any third party or to use any confidential or proprietary information or trade secrets and/or materials concerning the business of SAPTL or any of its dealings, transactions or affairs or those of any holding company, subsidiary or associated company of SAPTL (other than such information and/or materials which become part of the public domain by lawful means).

**8. Contractors & Suppliers**

Suppliers shall ensure that their employees, contractors, suppliers and other business partners adhere to this Code of Conduct.

**9. Monitoring of Compliance**

SAPTL reserves the right, upon reasonable notice, to conduct a compliance audit with Suppliers on the Code. Any violation of the Code shall be considered as a material breach of the contract/order by the Suppliers.

**Acknowledgement**

To: South Asia Pakistan Terminals Limited ("SAPTL")  
we, (Supplier's Company Name) \_\_\_\_\_ are fully aware of and  
willing to comply with the Supplier Code of Conduct of SAPTL.

\_\_\_\_\_  
Authorized Signature with Company

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

Position: \_\_\_\_\_

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

**SAFETY AND SECURITY POLICY**

SAPTL takes the matter of safety and security very seriously and has formulated the following rules, which are applicable to all persons, whether employees, visitors, Contractors or Contractors' workmen. All persons visiting or working at the Terminal are subject to these rules and are required to abide by them.

- a) It must be understood that the Terminal is a hazardous place by the very nature of its operations. Cranes, trucks, trailers, and other heavy lifting machinery is always in operation. Therefore, all persons, irrespective of their purpose in entering the Terminal, must be aware of the risks involved in entering such an area; and must proceed with utmost caution, and must always remain alert for their own personal safety. All Supplier staff must take safety induction session prior to being assigned on any jobs.
- b) Persons entering and working at the Terminal should pay particular attention to all Safety Signs and Cautionary Notices posted at various locations at the Terminal.
- c) Use of bicycles and motor bikes is forbidden inside the Terminal.
- d) All Persons on foot are advised to use the Pedestrian Walkways, which are clearly indicated with painted zebra crossing sign on the pavement.
- e) Safety Helmets must be worn by all persons entering Hard Hat areas. All areas in the vicinity of cranes, RTGs and other machinery are hard hat areas. Any person entering in terminal yard area must wear Basic PPE's i.e. hard hat, safety shoes & Hi visibility vests.
- f) Smoking or chewing pan/Gutka/Naswar, spitting and use of naked lights is strictly forbidden at the Terminal. Any person violating this rule will be summarily removed from the Terminal. A fine may also be imposed on any such person.
- g) A fine of PKR 500/- per day/person would be levied if any Supplier staff is found not wearing PPE's item that is hi visibility vests, hard hat or safety shoes. The amount will be deducted from annual fees of contractors. Staff consistent in violation will be banned from entry into the terminal.
- h) Any vehicles used by the Supplier in the port area shall be equipped with a flashing orange light (to be provided by the Supplier). The Supplier shall note that only plant and work vehicles on legitimate business shall be permitted to enter the port area. Personal vehicles owned by Supplier's operatives shall be left in the Terminal's vehicle parking area. Security identification badges shall be issued by the purchaser and are to be always worn by the entire Supplier's staff and operatives.
- i) Additional responsibility rests on Contractors providing services or undertaking any repair services at the Terminal, whether Civil, Electrical or others. Contractors undertaking any such work at the Company site shall ensure that all their workmen, engaged to work at the Terminal, are duly instructed, in the interest of their own personal safety, in safety rules in force at SAPTL.
- j) All staff engaged in any hot/height/confined space or high voltage work must obtain a permit to work & sign the form which the department responsible person will issue.
- k) Before commencement of any repair work at the terminal, the Supplier must mark and isolate the work area using Traffic Cones, which will be provided by the Terminal authorities on demand, and yellow tape to ensure safety of his

workmen. If the work area falls in way of vehicular traffic, the Supplier must ask the terminal authorities for empty containers to provide a safety barrier.

- l) Under no circumstances shall the Supplier deploy his workmen and proceed with any work before the required safety measures have been put in place.
- m) No Supplier shall resort to any short cuts in violation of established Safe Practices and Methods, or use improper / makeshift tools, protective gear or clothing to the detriment of his workmen's safety.
- n) Any person found in willful violation of the above rules shall be removed from the terminal forthwith.
- o) In the event of any injury, sustained by any contract worker, while at work at the Terminal, it shall be the responsibility of the respective Supplier to provide the necessary medical help to the injured person, including first aid and/or hospitalization.
- p) The company shall accept no liability or responsibility for any injury or fatality of any of Supplier's workmen.

### **ANTI-CORRUPTION AND ANTI-BRIBERY**

The Supplier represents and warrants that:

- I. It is not subject to any claim or litigation under the Anti Bribery Laws; and
- II. It has in place (and has had in place at all relevant times) adequate procedures designed to prevent any officer, agent or employee of the Service Provider, or any other person who performs the Services for or on behalf of the Service Provider, from undertaking any conduct which could result in the Supplier committing an offence under Anti-Bribery Laws, and to the best of its knowledge such procedures have been complied with.

For the purposes of this Clause, "**Anti-Bribery Laws**" means all applicable laws relating to anti-bribery or anti-corruption.

The Supplier shall ensure that it shall not (and its employees, agents and other officers involved in the provision of the Services shall not):

- a) Offer, promise, give or authorize, directly or indirectly, any bribe or kickback to or for the benefit of any person (whether in private or public office) in order to obtain any improper business or other improper advantage for the Company;
- b) Solicit, accept or receive (whether for the Company's benefit, the Supplier's benefit, their own benefit or that of their family, friends, associates or acquaintances) any bribe or kickback from any person (whether in private or public office) in return for providing any improper business or other improper advantage in relation to the Company's business;
- c) Otherwise use illegal or improper means (including bribes, favors, blackmail, financial payments, inducements, secret commissions or other rewards) to influence the actions of others; or
- d) Act as an intermediary for a third party in the solicitation, acceptance, payments or offer of a bribe or kickback.
- e) The Supplier shall ensure that its employees, agents and officers shall exercise common sense and judgment in assessing whether any arrangement could be perceived as inappropriate or corrupt.