



KUOK GROUP SINGAPORE

Kuok Group Singapore Supplier Code of Conduct



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1. Purpose

Kuok (Singapore) Limited (KSL), its subsidiaries, and its affiliates over which KSL has operational control (collectively, “Kuok Group Singapore”, “KGSg”, or the “Group”) are committed to fostering a sustainable and responsible business ecosystem that reflects our core values of Integrity, Effort, Unity, Compassion, and Gratitude. Our Supplier Code of Conduct (SCoC) seeks to fulfil this commitment by outlining the same expectations we hold for our suppliers and partners, as we do for ourselves.

Recognising the critical role supply chains play in achieving our sustainability goals, this Code of Conduct establishes the principles which we expect our suppliers to uphold. These principles are informed by relevant international conventions, industry best practices, and the laws and regulations of the jurisdictions in which we operate.

2. Scope

This Code of Conduct outlines our expectations for all suppliers engaged in business with KGSg, including the following business units: Allgreen Properties, K2 Strategic, PaxOcean Group, Pacific Carriers Limited (PCL), and PACC Offshore Services Holdings (POSH). Suppliers are responsible for communicating this Code of Conduct to their employees, subcontractors and other relevant third parties—in the local language and in a manner that is easy to understand—and ensuring their compliance with it.

The SCoC is divided into several main categories, each with minimum requirements set forth:

- a. Environment
- b. Human Rights and Labour Practices
- c. Workplace Health and Safety
- d. Business Conduct
- e. Cybersecurity and Data Protection

We will work with our suppliers to ensure adherence across each of the categories outlined below.

3. Environment

KGSg expects its suppliers to adopt effective environmental management practices and ensure compliance with all applicable environmental laws and regulations relevant to their operations.

3.1 Energy Management

Suppliers are encouraged to implement effective energy management practices that aim to reduce overall energy consumption and improve efficiency across their operations, aligning with our commitment to sustainable business practices.



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3.2 Carbon Management

Suppliers are encouraged to calculate their carbon footprint, including Scope 1 and Scope 2 emissions. In accordance with ISSB and broader regulatory reporting requirements, suppliers may be required to provide their emissions data as part of our Scope 3 inventory. KGSg further encourages suppliers to take proactive measures to reduce their carbon footprint, such as by optimizing operations, improving energy efficiency, and adopting low-emission technologies, where feasible. We value collaboration in working towards our shared emissions reduction goals.

3.3 Water Management

Suppliers are encouraged to adopt practices to minimise water consumption, thereby supporting responsible and sustainable water resource management.

3.4 Waste Management and Pollution Control

Suppliers are expected to adopt practices that minimize waste generation, promote recycling and reuse where possible, and ensure the safe and responsible disposal of all waste materials. Additionally, suppliers are expected to implement appropriate pollution control measures to prevent air, water, and soil contamination.

4. Human Rights & Labour Practices

KGSg seeks to ensure respect for human rights throughout its supply chain. In this regard, it expects its suppliers to adopt fair labour practices, to ensure safe and healthy working conditions, and to prohibit all forms of forced or child labour, in line with the United Nations (UN) Declaration of Human Rights and UN Guiding Principles on Business and Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, as well as local laws and regulations.

4.1 Forced Labour

Suppliers must ensure that all work is freely chosen and that no form of forced, bonded, indentured, or involuntary labour is used. Suppliers are required to respect workers' rights to freely enter into and terminate employment and to comply with all applicable laws and international standards prohibiting forced labour.

4.2 Child labour

KGSg prohibits the use of child labour in any form within our supply chain. Suppliers must refrain from any practices that violate the principles established in the ILO Minimum Age Convention or the minimum working age as defined by applicable local laws. Suppliers are expected to implement age-verification processes to ensure compliance and must provide a safe, non-exploitative work environment for all employees.



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4.3 Fair Compensation

Suppliers are expected to adhere to all relevant local laws concerning wages, benefits, and working hours in the countries in which they operate. This includes timely payment, transparent wage structures, and appropriate benefits, fostering dignified livelihoods.

4.4 Non-discrimination

We expect our suppliers to foster equitable workplaces, ensuring fair treatment and opportunities for all employees regardless of race, gender, ethnicity, religion, sexual orientation, or other protected characteristics.

5. Workplace Health and Safety

We believe that protecting the health, safety, and well-being of all individuals involved in our operations is a shared responsibility. Our suppliers play a vital role in ensuring that safe working conditions are upheld throughout our supply chain. Suppliers must ensure a safe and healthy working environment for all employees and are expected to proactively improve occupational health and safety, ensure that risks are effectively managed to prevent work-related accidents and injuries, in alignment with KGSg's target of zero workplace fatalities.

To help us achieve these targets, we expect suppliers to comply with the following as applicable to the scope of work and operations:

- **Comply with Legal Requirements**
Meet or exceed all applicable health and safety laws, regulations, and standards in the jurisdictions where they operate.
- **Implement a Structured Safety Management System**
Develop, implement, and maintain a health and safety management system that includes risk assessments, training, monitoring, and continuous improvement processes. While alignment with recognized standards (e.g., ISO 45001) is encouraged, the focus is on a robust and effective system tailored to operations.
- **Identify and Control Hazards**
Identify workplace hazards and implement effective control measures, particularly in high-risk activities such as working at height, confined space entry, electrical work, lifting operations, and chemical handling. This includes establishing health and safety policies, identifying and mitigating workplace hazards, providing appropriate personal protective equipment (PPE), and conducting regular safety training.
- **Provide Training and Competency**
Ensure that all workers are trained, competent, and informed about the risks associated with their work and the measures in place to protect them.



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- **Promote a Safety Culture**
Foster a culture of safety where all personnel are encouraged to report unsafe conditions, near misses, and incidents without fear of retaliation.
- **Maintain Incident and Emergency Preparedness**
Have procedures in place to respond effectively to emergencies and incidents, and maintain appropriate first aid, fire safety, and evacuation measures.
- **Monitor and Continually Improve**
Regularly review health and safety performance, investigate incidents, and implement corrective actions to prevent recurrence.

6. Business Conduct

Suppliers are required to uphold the same standards of ethics as KGSg, conducting business with integrity and in strict adherence with applicable laws and regulations.

6.1 Anti-Bribery and Corruption

We require all suppliers to maintain the highest standards of integrity by strictly prohibiting any form of bribery or corruption. Suppliers are expected to abide by KGSg's Anti-Corruption and Bribery Policy or their own equivalent, clear anti-corruption policies, and they must have practices in place to ensure that compliance.

6.2 Anti-Competition

Suppliers must conduct business in compliance with all applicable competition and antitrust laws, avoiding practices such as price-fixing, market manipulation, or unfair trade.

6.3 Conflict of Interest

Suppliers are required to identify and manage conflicts of interest to maintain impartiality and trust in our business relationships. Suppliers must disclose any situations in which personal, financial, or other interests could potentially influence their dealings with KGSg or its related parties. Suppliers are expected to implement measures to prevent or mitigate such conflicts, ensuring decisions are made in the best interest of ethical collaboration.

6.4 Sanctions and Anti-Money Laundering

Suppliers must ensure that their business dealings follow all applicable economic and trade sanctions programmes, laws, and regulations as well as anti-money laundering requirements in the jurisdictions in which they operate. Suppliers are expected to have procedures in place to prevent a breach of any such obligation.



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7. Cybersecurity and Data Protection

Where KGSg data and information are exchanged or stored by the supplier, the supplier is expected to implement appropriate administrative, physical, and technical controls to help safeguard the data—whether electronic or otherwise—from misuse or unauthorized access. Suppliers are expected to comply with applicable data protection and cybersecurity laws.

Suppliers must promptly and transparently report any cybersecurity incidents or breaches that may affect KGSg.

8. Compliance with Supplier Code of Conduct

We seek to build strong, sustainable partnerships with our suppliers and to ensure adherence to this Code of Conduct. As part of this commitment, we may periodically engage in discussions, request relevant information, and conduct pre-notified assessments or audits at supplier facilities. This approach helps us collectively identify areas for improvement and ensures alignment with our shared sustainability objectives.

Should non-compliance with the Code of Conduct be identified, we are committed to collaborating with our suppliers to address these issues. However, we reserve the right, at our discretion, to suspend or terminate any association where a resolution cannot be achieved or persistent non-compliance undermines our shared values.

9. Reporting Violations of the Supplier Code of Conduct

KGSg is committed to fostering an environment of transparency and accountability within our supply chain. Suppliers are expected to establish and maintain effective whistleblowing mechanisms that allow employees, subcontractors, and other stakeholders to report any suspected violations of this Code of Conduct, including unethical behaviour, breaches of labour standards, or environmental concerns, without fear of retaliation. Such mechanisms should ensure confidentiality and provide clear, accessible channels for raising concerns.

Any reports or concerns related to this Code of Conduct should be addressed directly to the supplier's relevant contact person(s) to ensure prompt investigation and resolution in line with our commitment to ethical business practices.

In addition, KGSg and each of its business units maintain whistleblower channels (which can be found on their websites) via which any concerns or incidents regarding compliance with this Code of Conduct may be reported.



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10. Review of Supplier Code of Conduct

This Code of Conduct will be reviewed periodically, and in any event at least once every three years, to ensure alignment with our material priorities, evolving sustainability standards and regulations, stakeholder expectations, emerging best practices, and business needs.