 <p>فصوباك هورايزون الفجيرة المحدودة <b>Vopak Horizon Fujairah Limited</b></p>	<p>DEPT Finance &amp; Control</p>	<p>Doc # PRO.08.12</p>	<p>Page 1 of 3</p>
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## 1.0 INTRODUCTION

VHFL select and retain suppliers, (sub) contractors and consultants (collectively called as Suppliers) on the basis of the qualifications and abilities needed for the work to be performed, including their reputation, safety performance and reliability, and to see to it that these Suppliers apply the same ethical business principles as applied by VHFL. We expect our Suppliers with whom we do business to uphold the same standards and we use our best endeavors to ensure compliance with these standards, which are reflected in this Code of Conduct (referred as Code), our Sustainability Policy and our Values.

VHFL has implemented this Supplier Code of Conduct to effectively meet industry challenges and ensure that Suppliers maintain highest ethical practices in carrying out their business activities with us. VHFL recognizes the importance of strengthening the relationship with Suppliers who are committed to the principles set out in this Code, thereby providing a solid foundation for a strategic partnership for future growth. If VHFL's policies are in direct conflict with applicable local laws, then the local law shall prevail.

The rights of a Supplier as well as VHFL's rights as a customer are governed by the terms and conditions stipulated in their contractual agreement and this Code is not intended to modify said terms and conditions.

VHFL retains the right to amend this Code at its sole discretion. Our Suppliers are responsible for ensuring that their employees interacting with VHFL are familiar with the Code and any applicable requirements for doing business with us. The most current version of the Code is available on VHFL website.

## 2.0 SCOPE

We trust this Code of Conduct provides through a set of policies and guidelines to all Suppliers working with VHFL with an understandable framework they should adhere to.

## 3.0 DEFINITION


VHFL	- Vopak Horizon Fujairah Limited
Suppliers	- Suppliers, (sub) contractors and consultants
Code	- Code of conduct

## 4.0 THE CODE ELEMENTS

- **People**
  - Tolerance
  - Fair labour practices
  - Safety health and environment
- **Integrity**
  - Conflict of interest
  - Business courtesies, gifts and entertainment
  - Bribery and corruption
  - Fraud and deception
  - Record keeping
- **Third party relations**
  - Vendor selection
  - Information management
- **Trust and Compliance**
  - Anti-corruption compliance
  - Trade compliance
  - Anti-trust and competition

### 4.1 PEOPLE

- 4.1.1 **Tolerance:** Suppliers are expected to support and respect each employee's right to his or her personal beliefs and values. Discrimination, harassment, intimidation, abuse, violence and any other disrespectful or offensive behaviour to individuals is not permitted in our workplace.
- 4.1.2 **Fair labour practices:** Suppliers are expected to treat people with respect and dignity. Suppliers need to follow the labour laws and other such laws and regulation in regard to working hours and overtime. Workers shall be treated consistent with applicable laws and regulations. Likewise, we

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expect the Suppliers to pay the wage in a timely manner and compensate their workers for any overtime work as required by the applicable laws and regulations.

Suppliers are not expected to use, employ, or seek to exploit in anyway the services of child, under-aged, slave or trafficked labour.

- 4.1.3 **Safety health and environment:** Suppliers are expected to establish an appropriate management system for Environment, Health and Safety. Suppliers are further expected to operate in a manner that actively manages risk, conserves natural resources and protects the environment in the communities within which they operate.

Suppliers need to protect the health, safety, and the welfare of their employees, contractors, visitors and others who may be affected by their activities. Suppliers shall comply with all applicable environmental, health and workplace safety laws and regulations.

## 4.2 INTEGRITY

- 4.2.1 **Conflict of interest:** VHFL requires that its Suppliers not engage in, or give the appearance of engaging in, any activity involving any conflict or reasonably foreseeable conflict between their personal interests and the interests of VHFL.

If a Supplier is in doubt on whether a situation is considered a conflict of interest, then he/she has the obligation to raise the matter to VHFL representative to clarify any doubt and ensure transparency.

If a Supplier has any other relationship with any VHFL personnel that might represent a conflict of interests, our Suppliers should disclose this fact to VHFL.

- 4.2.2 **Business courtesies, gifts and entertainment:** A business courtesy is anything of value that is provided to or received from a third party in the context of a business interaction. It might be a gift, an offer of hospitality, or something else. Business courtesy that compromise, or even appear to compromise, our ability to make objective and fair business decisions are inappropriate. Suppliers are expected to compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage or preferential treatment.

- 4.2.3 **Bribery and corruption:** Suppliers must not offer, solicit, give or accept any form of bribe or kickback or participate in other illegal inducements in business or such relationships with VHFL. Compliance with all applicable anti-bribery, corruption and money-laundering laws at all times is required. We expect our Suppliers to take steps to ensure that their personnel and any sub-contractors, agents or representatives engaged to act in business relation to VHFL also meet these expectations.


- 4.2.4 **Fraud and deception:** Suppliers must not seek to gain any advantage of any kind by acting fraudulently, deceiving people or making false claims, or allow anyone else to do so. This includes defrauding or stealing from the company, a customer or any third party, and any kind of misappropriation of property.

- 4.2.5 **Record keeping:** The Supplier will keep accurate, complete and reliable books and records prepared and maintained in accordance with applicable laws and regulations.

## 4.3 THIRD PARTY RELATIONS

- 4.3.1 **Vendor selection:** Suppliers must carefully select and monitor the third parties they use to perform work or to supply materials for VHFL. Suppliers are expected to conduct contextually appropriate due diligence and background checks. We reiterate that Suppliers are responsible for ensuring their third party contractors comply with this Code when they are utilized in the service intended for VHFL.

- 4.3.2 **Information management:** Suppliers shall adhere to the highest standards of honesty and integrity. Suppliers must prevent inappropriate or unauthorized access to, use or disclosure of any confidential information belonging to VHFL or its clients, both during the course of and after completion of work and business activities with VHFL. Similarly, the Supplier must never access, use or distribute any confidential information belonging to clients, competitors, business partners etc.

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Suppliers shall properly handle sensitive information, including confidential, proprietary, and personal information. Information should not be used for any purpose (e.g. advertisement, publicity, and the like) other than the business purpose for which it was provided, unless there is prior authorization from VHFL of the information.

**Handling and protection of personal data:** VHFL respects any individual's general right to privacy of their personal data and adheres to applicable local laws on the use of personal data. VHFL is committed to securing customer, supplier and personal data against (personal) data breaches (e.g. cybersecurity). All personal data must be treated as confidential data.

#### 4.4 TRUST AND COMPLIANCE

- 4.4.1 **Compliance with Laws and Regulations:** Supplier must conduct business in compliance with all applicable laws and regulations, including but not limited to those relating to corruption, bribery, money laundering, competition, terrorism, occupational health and safety as well as environment controls.
- 4.4.2 **Trade Compliance:** The Supplier's activities must be fully compliant with all applicable international trade sanctions, export controls, customs and anti-boycott laws and regulations. Our Suppliers shall not be affiliated to, and shall not be acting for the benefit of any sanctioned parties/ countries.
- 4.4.3 **Anti-Trust and Competition:** Suppliers shall not enter into any agreement that might restrain business which includes price fixing, dividing or manipulating the market, colluding in bids or unlawfully restricting competition.

#### 5.0 COMMUNICATION

- 5.1 **Reporting misconduct (Whistleblowing):** Depending on the circumstances of who is thought to be involved in the suspected fraud, Supplier(s) can approach top management of VHFL as per the details given below:

General Manager	Mr. Say Huat Law	say.huat.law@vopak.com
Finance Manager	Mr. Srinivasan M.P.	sri.padmanabhan@vopak.com

If any Supplier prefer to report anonymously they can do so by sending an email to the confidential email account [whistleblower@vopak.com](mailto:whistleblower@vopak.com), which is monitored by the Director Global Internal Audit. Concerns raised will be treated confidentially and, if necessary anonymously. Suppliers will not be retaliated against or suffer negative consequences for raising concerns in good faith about suspected misconduct.

- 5.2 **Consequences:** In the event that the expectations of this Code are not met, the business relationship may be reviewed and corrective action pursued subject to the terms of the related procurement contract(s.)

#### 6.0 RECORDS

Nil

#### 7.0 REFERENCES

Nil

Revision #	Date:	Brief of revision
0	21.02.2019	First release