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KWEHK Supplier Code of Conduct

1.0 Introduction

1.1 Code of Conduct for Suppliers of KWEHK

Kintetsu World Express, Inc. and its affiliates like Kintetsu World Express (HK) Limited (“KWEHK”) throughout the world are engaged in business in compliance with the laws and regulations of each respective country. As a global and size company, KWEHK expects its suppliers to observe high ethical standards and to comply with all laws and regulations when conducting their businesses. Therefore, a set of effective ethical standards for suppliers is very important. This Supplier Code of Conduct is to set the ethical standards for doing businesses with KWEHK.

KWEHK believes that this Supplier Code of Conduct would establish and maintain the long-term business relationships between KWEHK and its suppliers.

1.2 Scope

This Supplier Code of Conduct is applicable to all business partners with whom we may be conducting business. These includes but not limited to suppliers, agents and contractors (“Suppliers”). The Suppliers shall ensure that its suppliers, agents and sub-contractors comply with this Supplier Code of Conduct.

2.0 Compliance with Laws

The Suppliers are expected to comply with all international and local laws and regulations as well as a variety of licenses, permits, approvals and governmental authorizations to conduct its normal daily activities. In additional to the laws and regulations, the Suppliers must act in accordance with such other related rules and regulations **as prescribed by organizations such as The International Air Transport Association (IATA) and The International Civil Aviation Organization (ICAO) customs authorities, etc.** The Suppliers must comply with not only the letter of the law but also the spirit of the law that governs our actions as individuals and as a company.



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3.0 Anti-Corruption

KWEHK endeavors to conduct its business according to the highest ethical standard. All behaviors regarding bribery will be strictly prohibited, thus the Suppliers are expected not to accept or offer bribes.

KWEHK's employees do not seek any advantage, whether for itself or its customers, through the use of improper inducements, and KWEHK strictly prohibits its directors, managers, officers, employees and others acting on its behalf, directly or indirectly, from providing, attempting to provide, or offering funds, assets, or other things of value in the form of bribes, kickbacks, or other payoffs to any actual or prospective customers, suppliers, logistics service providers, and government officials.

The Suppliers must comply with the Prevention of Bribery Ordinance (Cap 201). KWEHK has prohibited all employees to solicit any advantage from clients, suppliers, contractors, or any person in connection with company business.

KWEHK does not agree Suppliers to offer favors, including but not limited to money, services and entertainment, to a civil servant or other government employee. This holds true for inappropriate payments made through agents and third parties as well.

4.0 Gifts and Entertainment

Giving seasonal gifts to valuable customers is an accepted way of showing appreciation in doing business in Hong Kong. However, it is the policies of KWEHK that employees or their family members must not receive from Suppliers any goods or services or discounts that are offered in exchange for our business.

4.1 Gifts of nominal value

It should be acceptable to receive a gift of nominal value as long as it is offered out of courtesy and the recipient does not believe that any special reciprocation or consideration will be expected in exchange for such action.

4.2 Business Meal and Entertainment

The business meal and entertainment are conducive to developing good relationship and carrying on informal business discussion with a customer. Such an entertainment must not be so extravagant as to influence the party's decision making in business with KWEHK or make other party feels the obligation to do something in return or make a concession. The purpose of business entertainment is to enhance relationships and understanding with our business partners and should not be



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excessively targeted to an individual. It is important that our act be justified in the eye of our customers, partners and the competitors.

5.0 Antitrust Laws

KWEHK Ethical Code of Conduct for its employee prohibits the non-compliance with Antitrust Laws; hence the Suppliers shall strictly comply with the international antitrust laws and Competition Ordinance (Cap 619) in Hong Kong. These laws govern our conduct and transactions when dealing with customers, suppliers, and competitors.

Such prohibited activities and arrangements include but not limited to:

- a) agreements with competitors to fix or control pricing,
- b) agreements with competitors to allocate services, products, markets or territories,
- c) agreements with competitors to boycott certain customers or suppliers,
- d) agreements to refrain from or limit the manufacture, sale, or production of any products, and
- e) agreements regarding reciprocal purchase arrangements or tie-ins.

In particular, the antitrust laws are designed to protect consumers by prohibiting certain activities and arrangements that may have the effect of reducing competition. It is KWE Group's policy that our employees shall not enter into any agreement, understanding, plan or scheme with any competitor regarding prices or pricing policies, allocation of services, business markets or territories, selection of customers or suppliers or any other similar competitive information. Just as important, our employees shall not knowingly participate in any information meetings, exchange information, correspond directly or indirectly or even discuss any of the above with any competitor.

The Suppliers shall observe these antitrust laws and are encouraged to implement the compliance program in order to prevent their employees to receive or disclose the information on price-fixing or other terms and conditions to or from the unrelated third parties including competitors and business partners.

6.0 Human Rights

KWEHK strictly prohibits any forced, bonded or compulsory labor, any employment of workers under the minimum legal employment age and all other abuses of labor standards. All rights and remedies available under applicable labor and employment



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laws will be available to all employees. The Suppliers are expected to comply with the same ethical principle.

7.0 Harassment

The Company is firmly committed to maintaining a work environment free of harassment based upon race, skin color, religion, sex, age, national origin, citizenship, disability, marital status, veteran status, sexual orientation, genetic information or any other characteristics protected by applicable laws.

Accordingly, sexual harassment (behavior, conversation and act) is not allowed. Statement slandering other's ethnic background or religious faith is prohibited. Other inappropriate acts prohibited include (1) physical or psychological (2) violent behavior, (3) possession of arms and weapons, (4) possession or sale of narcotics and other illegal substance except prescribed drugs.

If a person is found under the influence of narcotics or alcohol, for example, the person cannot enter KWE's premises. The Supplier's employees shall comply with this regulation and is prohibited from harassing KWEHK employees. The Suppliers shall take preventive actions to avoid harassment and inappropriate acts in the workplace.

8.0 Health and Safety

KWEHK encourages Suppliers to share in the commitment to a safe and healthy work environment. Each employee of the Suppliers is responsible for immediately reporting any accidents, injuries and/or unsafe working conditions and maintaining a safe and healthy work environment. Workplace violence, any threatening behavior and all forms of unlawful conduct will not be tolerated.

KWEHK has obtained the certificate of Occupational Health & Safety Management System (OHSAS 18001) since 2009 and adopted ISO 45001 since May 2020. Thus, the Suppliers' employees shall comply with policies and procedures of ISO 45001 in our premises.



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9.0 Environmental Protection

It is the duty of all of us to preserve the environment for future generations. We are faced with environmental issues in the society, including industrial waste, water sewage pollution, air pollution and noise from exhaust gas, etc. Those issues are becoming international or borderless with emphasis on global warming, destruction of ozone layers and tropical forests, green land lost to desert, acid rain, and protection of endangered species. KWEHK and its affiliates recognized to essential needs for tackling the environment issues as part of our corporate activities and voluntarily aim at involvement in protection of the environment.

KWEHK promotes the full utilization of all material available. We believe in efficiently using material, resources and energy and avoid wasting them as much as possible. The Suppliers shall comply with all laws and regulations on the environment protection and are encouraged to minimize the environmental impact.

KWEHK has obtained the certificate of Environmental Management System (ISO 14001) since 2006. KWEHK maintains effective management system to monitor our daily activities and ensure that continuous improvements are made to our efforts. The Suppliers shall ensure their employee to follow the procedures of ISO 14001 when they assist to handle our operations.

10.0 Compliance with the Supplier Code of Conduct

Suppliers must comply with KWEHK Supplier Code of Conduct and to comply with principles in their choice of business partners and when conducting their businesses. Thus, Suppliers are required to familiarize this Supplier Code of Conduct even they have not received the copy of Supplier Code of Conduct. KWEHK reserves the right to verify that its Suppliers meet the standards of the Supplier Code of Conduct.

All reported non-compliance with the Supplier Code of Conduct will be promptly investigated by KWEHK and will be treated confidentially to the extent consistent with KWEHK's interests and its legal obligations. If the result of the investigation indicates that corrective action is required, the Board of Directors will decide what steps should be taken to rectify the problem and avoid the likelihood of its recurrence.

KWEHK reserve the right without liability to terminate the business relationship with immediate effective if the reported violations of the Supplier Code of Conduct is serious and repeated.



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11.0 Monitoring and Reporting

The Suppliers shall have responsibility to disclose / report the suspected violation of non-compliance behaviour.

- a) The Ethics and Compliance Reporting Hotline is a telephone line that is available to all suppliers and employees and the third parties 24 hours a day. (Reporting Hotline Telephone Number: 852-6291 8060)
- b) The Suppliers can submit the Supplier Ethics and Compliance Reporting Form (Appendix 1) to the GRC Committee by e-mail at kwehk-compliance@kwe.com or the **EAHQ** by e-mail at ea.hk.hotline@kwe.com (please refer to KWEHK Ethics and Compliance Reporting Policy)

The Company prohibits any form of retaliation against the person for reporting in good faith a potential violation of any anti-corruption laws or for assisting in an investigation.

12.0 Review of Supplier Code

This code will be reviewed from time to time.



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Appendix 1

SUPPLIER ETHICS AND COMPLIANCE REPORTING FORM **CONFIDENTIAL**

When you know or suspect the compliance violations, please use the report form below. Once completed, this report becomes confidential. The supplier may send the report, marked confidential and addressed to the GRC Committee <kwehk-compliance@kwe.com> or the **EAHQ** <ea.hk.hotline@kwe.com> by email.

Your Name/Contact Telephone Number and Email *please fill the mandatory items. Concerns expressed anonymously will not be considered.	*Name:
	Address:
	*Tel No:
	*Email:
	Date:
The names of those involved (if known):	
Details of concerns: Please provide full details of your concerns: names, dates and places and the reasons for the concerns (continue on separate sheet if necessary) together with any supporting evidence / documents.	

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供應商關注不當行為舉報表格
機密

當任何供應商、代理人、外判商及業務合作伙伴遇到本公司內任何懷疑不當行為或舞弊情況時，應挺身而出表達關注。請使用本舉報表格以書面形式向企業管治委員會舉報。本表格一經填妥，即成為機密文件。請於電郵主題列明”機密”並電郵至：kwehk-compliance@kwe.com，企業管治委員會或 ea.hk.hotline@kwe.com，東亞總部立即跟進處理，並會合理地盡力避免披露該名人士的身份。

閣下姓名/聯絡電話號碼及 電郵地址： * 必須填寫項目。本公司鼓 勵你在本表格內填寫你的姓 名。以匿名方式舉報，一律 不予以理會。	*姓名:
	地址:
	*電話號碼:
	*電郵:
	日期:
涉及人士的姓名（如知悉）：	
舉報詳情： 請提供舉報的詳細資料：有關人士的姓名、事件日期或時期及地點，關注原因（如有需要，請另紙填寫），連同任何證據／證明文件。	

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