

Supplier Code of Conduct 2024 - Tourism Holdings Limited (thl)
thlsustainability.com

I. Purpose

thl is committed to being a future-fit business. This means we use the Future-Fit Business Benchmark to help us become environmentally restorative, socially just and economically inclusive. We recognise the importance of minimising the impact of our operations on our surroundings by operating in a sustainable manner.

The Future-Fit Business Benchmark is a science-based methodology that is aligned with the UN Sustainable Development Goals. It uses a self-assessment approach that equips companies to manage and improve their social and environmental performance while creating value over the long term. We encourage our suppliers to start on their own future-fit journey.

At *thl*, we are also on the journey to improve our sustainability performance. As our 'tier one' supplier, your performance is directly linked to our performance. So, when you do better, we do better. We have a long way to go, but by working in partnership with our suppliers and moving forward together, we believe we can contribute to a future-fit society.

We seek to engage and collaborate with suppliers who share our commitment and approach to conducting business. The *thl* Supplier Code of Conduct ("Code") supports the continued application of our commitment to advance social and environmental responsibility beyond our own operations to our supply chain. We expect *thl* suppliers to meet the minimum standards defined by this Code and fully comply with all applicable laws and regulations when conducting business with *thl*.

II. Scope

This Code outlines minimum standards and expectations applicable to all suppliers, including their parent, subsidiaries, affiliates, and sub-contractors ("suppliers") providing goods or services to the *thl* Group. Suppliers will be responsible for all activities associated with disseminating and educating its employees, agents and suppliers on this Code, verifying compliance with this Code and taking action in response to non-compliance.

III. Code Standards

1. Labour and human rights

thl supports the protection of human rights and is guided by principles such as those in the UN Global Compact, the United Nations Universal Declaration of Human Rights, UN Convention on the Rights of the Child, and the International Labour Organisation (ILO) Core Conventions and the UK Modern Slavery Act 2015, California Transparency in Supply Chain Act, Australian Modern Slavery Act 2018 and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act. The development of this Code of Conduct has taken into consideration the Custom Tariff Regulations in Canada and the United States to prevent the importation of goods produced by forced labour and child labour.

We encourage our suppliers to embrace international standards relating to human rights. Suppliers must respect the labour rights of their employees in the workplace and monitor human rights within their supply chain.

Our minimum standards are:

- a. Employees are not subjected to discrimination based on race, national origin, ethnicity, religion, gender, age, marital status, sexual orientation, disability or any other reason
- b. All products and services supplied to the *thl* group are manufactured or provided under safe and healthy conditions
- c. Only employees who are legally authorised to work in their facilities are. Suppliers shall be responsible for validating their employees' eligibility to work through appropriate documentation
- d. All employees meet the local legal minimum labour age permitted by the law of the country or countries where the performance, in whole or in part of the contract, takes place. Child labour is strictly prohibited
- e. Employees engaged in the manufacture and supply of products and services are voluntarily employed, and under no circumstances is any form of forced, coerced, bonded, indentured or involuntary labour or otherwise used. *thl* prohibits the procurement of any goods produced or manufactured in China's Xinjiang Uyghur Autonomous Region as this carries a risk of forced labour.
- f. All employees are paid a proper and competitive wage which meets their basic needs and provides discretionary income and is no less than the standards specified by local laws, where applicable

- g. Employee working hours, including voluntary overtime work, and the granting of leave of any form, are in accordance with applicable local and/or national laws. Workers shall not work more hours in one week than allowable under local laws. Overtime is expected to be voluntary, compensated at a legal rate and is to be provided under safe and healthy work conditions
- h. Employees are not exploited or subjected to abuse of any kind, including psychological, physical, sexual or verbal abuse. Intimidation, threat or harassment is not tolerated
- i. Employees' right to freedom of association and collective bargaining is acknowledged. Where these rights are restricted by law, suppliers will not hinder the development of alternative means of independent and free association and bargaining the privacy rights of all employees will be respected whenever private information is gathered or employee monitoring practices are in place.
- j. Employees are paid a wage that is enough to meet their basic needs and secure essential services for themselves and their families.

Where possible, we encourage our suppliers to: pay their employees a living wage which meets their basic needs and secure essential services for themselves and their families. Paying a living wage allows employees and their families to have the means to afford health coverage, eat a nutritious diet and be free of concerns about meeting basic needs.

2. Health and Safety

thl takes the health, safety, and wellbeing of our crew seriously. Suppliers are responsible for safeguarding the physical and mental wellbeing of everyone in their organisation and for compliance with all regulatory and statutory health and safety requirements. We encourage suppliers to integrate sound health and safety management policies, practices, and systems into their businesses, aimed at promoting the general health of employees, reducing work-related injuries and illness, and maintaining the safety and quality of all products and services as specified in the supply agreement.

Our minimum standards:

- a. Suppliers to make a copy of their health and safety policy available to all their staff and provide employees with appropriate workplace health and safety training
- b. While at any **thl** Group premises, all supplier personnel are expected to comply with **thl**'s health, safety and wellbeing policies, and to provide safe working methodologies for any high-risk works.

3. Environmental sustainability

thl is striving to become future-fit, and this includes being environmentally restorative and continuously improving our processes to minimise the negative impacts of our operations on the environment. We will conduct business with suppliers who share our commitment to establish environmentally responsible business practices and proactively improve our environmental performance.

Our minimum standards are that suppliers:

- a. Conduct their business in accordance with all applicable laws and regulations regarding the protection and preservation of the environment
- b. Endeavour to do no harm to the environment
- c. Endeavour to measure and minimise operational environmental impacts such as those pertaining to waste disposal, greenhouse gas emissions and pollution, and endeavour their subcontractors and suppliers to do the same
- d. Actively support **thl**'s goal to establish transparency and traceability within all levels of our supply chain and be willing to share information on the origin of where products and sub-components are produced (we note this may be challenging)
- e. Provide relevant environmental data to **thl** on request.

We encourage suppliers to seek continuous improvement in their sustainability performance, through actions which could include:

- Taking back their products for reuse, repurposing or recycling at end-of-life
- Offering **thl** sustainable or circular options
- Identifying risks to, and opportunities for, their business from climate change or the transition to a low-carbon future
- Publishing a sustainability or environmental policy that is proportionate to the environmental risk of their business operations, and which is signed by an Executive or Senior Manager.

4. Ethical business

thl recognises its responsibilities as a good corporate citizen. We adhere to a Code of Ethics that outlines the standards of behaviour that the community, including our employees and shareholders can expect from us. We ask that business dealings are handled with integrity, transparency and honesty.

All **thl** suppliers are expected to adhere to high standards of moral and ethical conduct, comply with all applicable laws and regulations and refrain from engaging in any form of corrupt practices, including anti-competitive activity.

Our minimum standards are that suppliers:

- a. Conduct their business in full compliance with all applicable competition and fair-trading laws at all times.
- b. Comply with 'insider trading' laws when in possession of information about the Tourism Holdings Group (or any member thereof) or another company that is not available to the investing public and that could influence an investor's decision to buy or sell stock
- c. Comply with all applicable environmental laws and regulations, including those relating to hazardous materials, air emissions, waste and wastewater discharges
- d. Comply with anti-corruption and anti-bribery laws of the countries in which it does business, and not make any direct or indirect payments, including bribes, kickbacks, or other promises of payments to foreign government officials or other third parties for the purpose of inducing the individual to misuse their position to obtain or retain business, receive improper benefits or other unfair or improper advantage
- e. Disclose any actual, perceived, or potential conflict of interest to thl, including any employee or contractor of **thl** who may have an interest or economic tie of any kind in the supplier's business
- f. Maintain transparent and accurate financial and business records to demonstrate compliance with applicable laws and regulations, as well as generally accepted accounting principles. It is expected that such information be disclosed without falsification or misrepresentation to appropriate parties as required.

5. Information security

Our minimum standards are that suppliers:

- a. Comply with *thl*'s requirements relating to personal information, confidentiality, security, data privacy and intellectual property protection
- b. See that appropriate controls are in place to protect brand and intellectual property against unauthorised use and damage. Any information used in the business relationship with *thl* that is non-public and proprietary must be protected against loss and infringement. Any disclosure or use of such information is only for the purposes authorised by the contractual agreement. In the case of sub-contracting, sharing of confidential information must be made with the prior consent of *thl*.

6. Emergency prevention, preparedness, response, and business continuity

Our minimum standards are that suppliers:

- a. Shall identify and assess potential emergency situations and develop appropriate risk management controls, business continuity and emergency response plans to minimise harm and damage to property. These are expected to be made available on request by *thl*.

7. Commercial sustainability

thl values suppliers who contribute to our development of a sustainable supply chain. Our suppliers should actively pursue opportunities for continuous improvement and development of process efficiencies in product and service delivery. This may include minimisation of waste and emissions, collaboration, ongoing innovation and market developments and total cost reduction. We expect our suppliers to be transparent about their social, environmental, and economic sustainability practices.

IV. Application of the Code

Supplier written acknowledgement of this Code is a prerequisite for key or tier one suppliers in every *thl* agreement to supply (verbal or written). The standards of this Code are in addition to, and not in lieu of, provisions of any legal agreement or contract between suppliers and Tourism Holdings Ltd.

thl recognises that achieving these standards will involve a dynamic process and encourages suppliers as a minimum to:

- a. Meet the standards set forth in this Code, or, where any standards are not met, establish clear goals toward meeting the standards set forth in this Code within an agreed time period, and
- b. Actively review, monitor and modify their management processes and business operations to see that they facilitate continuous improvement
- c. Notify **thl** of any material breaches to the Code.

thl reserves the right to undertake the following inspections as part of its ongoing monitoring of compliance:

- a. Monitor that milestones have been set and management systems have been put in place to see that the principles set out in this Code have been met, and
- b. Verify compliance with the Code through site and facility audits. Suppliers are expected to maintain and be able to provide **thl** with documentation that demonstrates compliance with this Code on request. This Supplier Code of Conduct does not create any binding obligations on **thl**.

At **thl**, we recognise the importance of observing the conduct, standards and behaviours described in this Supplier Code of Conduct and we will undertake our best endeavours to observing, as a minimum, the standards defined by this Code when conducting business; and transparently sharing where we cannot do so and are on the journey to improve our performance.

To support the application of this Supplier Code of Conduct, **thl** has a 'SpeakUp' Policy and processes to maintain whistle-blower confidentiality and protection. We would welcome any concerns about our businesses or our suppliers to be reported (confidentially if required) to: <https://ethicspro.reportitnow-global.com/THL>

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