

## SUPPLIER CODE OF CONDUCT

### INTRODUCTION

Stamford Land Corporation Ltd ("**Stamford**") is Australasia's largest independent owner-operator of luxury hotels.

As the leading luxury hospitality provider and property developer in Australasia, Stamford (also referred to in this document as "*we*" or "*our*") aims to (i) have procurement practices that are ethical; (ii) be environmentally and socially responsible; and (iii) stand guard against corruption and fraud. As a purchaser of products and services, we also aim to reduce adverse impacts and identify opportunities within our supply chain to drive positive social and environmental change.

In all instances, we expect adherence to our Core Values, namely:

- Can-do Attitude
- Recognise and Respect
- Eye for Detail
- Discipline
- Ownership

Accordingly, we require all Suppliers (as defined below) to comply with this Supplier Code of Conduct ("**Code**") and all applicable laws, rules and regulations in all locations where they conduct business. We also expect that our Suppliers (i) communicate these principles to their own contractors and vendors; and (ii) encourage their own contractors and vendors to incorporate these principles into their business policies and practices.

For purposes of this Code, "**Supplier**" means any company, corporation, entity or individual - including their employees, subcontractors, agents, and other representatives - that sells, or seeks to sell, goods or services to or through Stamford or any of Stamford's subsidiaries, affiliates or associates, either directly or indirectly.

### 1. COMPLIANCE WITH LAWS AND REGULATIONS

Suppliers shall comply with applicable laws, rules and regulations relating to their activities in the countries in which they operate. Where there are differences or conflicts between this document and local law, the higher standard should prevail.

Suppliers shall notify Stamford immediately of any violation of applicable laws, rules and regulations that may affect their ability to supply products or services to the Stamford Group ("**Group**") in accordance with this Code.

### 2. ETHICAL BUSINESS PRACTICES

Stamford expects its Suppliers to conduct their business in a lawful, fair and ethical manner. Suppliers shall adhere to a high ethical standard, and ensure integrity, transparency and conformance with applicable laws and the standards of this Code.





Suppliers shall recognise and respect the Group's intellectual property rights including the Group's trademarks, copyright, design rights and patents. Suppliers shall not engage in any activities that may infringe upon any of the Group's intellectual property rights or tarnish the Group's reputation.

#### **10. SECURITIES AND INSIDER TRADING**

If, during the course of its work for Stamford, a Supplier has access to material confidential information, it must not use or share that information in any way to trade or enable others to trade the securities of Stamford.

#### **11. TRADE AND EXPORT/IMPORT**

Suppliers must conduct their business in line with applicable (i) trade controls; and (ii) export, re-export and import laws and regulations.

#### **12. COMPLIANCE AND NOTIFICATION**

Suppliers should take appropriate steps to ensure that the principles of this Code are communicated to their employees and throughout their own supply chains. Suppliers should also take appropriate steps to ensure that the principles of this Code are adopted and applied by their employees, suppliers, contractors, subcontractors, agents and representatives to the extent applicable.

Suppliers must monitor compliance with this Code and notify us as soon as reasonably practicable of any actual or suspected breach. Suppliers must take prompt and reasonable steps to address, remedy and prevent repetition of any breach.

Stamford holds each of its Suppliers accountable for ensuring compliance with this Code, and may request that a Supplier demonstrate such compliance to the satisfaction of Stamford.

We reserve the right to:

- (i) verify compliance with this Code and require Suppliers to cooperate and provide reasonable supporting evidence. This may include (a) Supplier's completion of self-assessment questionnaires, fulfilling requests for further information and documentation; and/or (b) site visits or audits by us or our agents; and/or
- (ii) terminate our business relationship with the Supplier in the event of ongoing or repeated breaches.

Suppliers must ensure that there is no sub-contracting of material obligations, unless approved by us.

We may amend this Code from time to time for any reason, including to reflect legal and regulatory changes or changes in industry best practice.

If a Supplier has any concerns regarding the ethics of its relationship with Stamford or any actual or suspected breach of this Code, it should contact us at [Whistleblower@stamfordland.com](mailto:Whistleblower@stamfordland.com).

*[As of 9 May 2023]*