

SUPPLIER CODE OF CONDUCT

1. Purpose

- 1.1. ARC MARINE PTE LTD and ARC MARINE ENGINEERING PTE. LTD. (hereinafter collectively referred to as "ARC Marine"), affirm a steadfast commitment to conducting business with ethical and responsible practices. Our foundational principles of integrity and accountability serve as the cornerstone of our business operations, guiding not only how we manage our supply chain but also influencing the broader impact of our business activities beyond our immediate operations.

2. Scope

- 2.1. The Suppliers Code of Conduct (referred to as "the Code") delineates the standards of conduct expected from ARC Marine's suppliers and their parent entities, subsidiaries, affiliates, and employees.
- 2.2. The term "Suppliers" encompasses any individual or entity, as determined by ARC Marine, and includes:
 - i. Contractors of ARC Marine;
 - ii. Direct suppliers to ARC Marine; and
 - iii. Selected sub-suppliers and third party service providers.
- 2.3. Suppliers bear the responsibility of disseminating the Supplier Code of Conduct to all their employees, subcontractors, and pertinent third parties. When deemed necessary, suppliers must conduct training in the local language to guarantee a comprehensive understanding of the principles outlined in this SCOC among all individuals, including employees and third parties engaged in projects associated with ARC Marine.
- 2.4. In the event of a supplier violating any provisions outlined in this Code, ARC Marine retains the exclusive right to cease business with said supplier, which may include the termination of any existing contracts. ARC Marine assumes no liability for claims arising from losses or damages resulting from such actions.

3. Compliance with Company Values, Laws, Rules, and Regulations

- 3.1. Suppliers will operate its business in accordance with all applicable safety, environmental and safety laws, and regulations to ensure the protection of the environment and the Company's personnel and property. The Company shall conduct its business in a socially, environmentally, and economically responsible manner, which fosters safe and ethical behaviour, both in the office and on-board ships so that life, environment, and property are not subjected to undue risks at any time.

- 3.2. Supplier's employees, as applicable to their roles and responsibilities, should familiarise themselves with the company's values, policies, and procedures. Upholding these should guide their actions both within and outside the workplace. Employees shall always follow safe work practices and procedures. Employees are responsible for complying with the various laws, rules and regulations of the countries and regulatory authorities that affect the Company's business. This includes, and is not limited to, safety and working environment of employees; protection of the environment; anti-bribery and corruption; anti-money-laundering; data protection; tax and public duties and ensure fair competition. Suppliers are required to maintain precise and comprehensive company records, reports, accounts, and documentation in strict adherence to applicable laws and regulations. Intentional creation or inclusion of inaccurate or misleading statements in any record, report, or document is strictly prohibited. Suppliers must not engage in, or assist in, the falsification of any document or record, whether financial or otherwise.
- 3.3. In certain areas, such as sanctions and anti-corruption, the suppliers may adopt stricter policies than required by national laws.

4. Human Rights and Modern Slavery

- 4.1. Suppliers shall prohibits forced labour, child labour (Suppliers shall not employ children below the age of 15 or the minimum age for employment according to applicable local laws), human trafficking, or any other form of modern slavery whatsoever throughout the organisation. We conduct our businesses through our code of conduct and in compliance with human rights, labour rights and modern slavery (LRMS) principles.
- 4.2. Supplier shall be committed to protecting the fundamental human rights of anyone affected by our operations. We recognise that the respect for human rights is a global standard and that upholding such rights is a responsibility to be expected of all businesses wherever we operate. We do not tolerate any form of slavery or human trafficking in our organisation. We expect the same high standards from all our business partners.

5. Harmony, Respect, Equality and Diversity Policy

- 5.1. Suppliers shall be committed to foster an inclusive work environment that promotes equality and diversity. All employees shall be treated equally and without discrimination. Employees are to work in harmony and treat one another with respect without any racial or religious conflicts and be collaborative to achieve the company's common goal to provide a harmonious and healthy working environment in which all employees onboard and ashore can work free of victimization, harassment, and bullying. Suppliers should adopt 'Zero tolerance' approach to any kind of abuse.
- 5.2. Every Supplier's employee shall adhere to ethical and professional conduct and to a strict policy of non-discrimination. Suppliers must prohibits discrimination against any Employee or prospective Employee based on gender, race, colour,

age, religion, sexual orientation, marital status, national origin, disability, ancestry, political opinion, rank, hierarchy, or any other basis prohibited by the laws that govern its operations. Suppliers must prohibits victimization, harassment, and bullying, includes any conduct likely to cause offense or humiliation to any person or that might, on reasonable grounds, be perceived by a reasonable person to place a condition on employment or on any opportunity for training or promotion.

- 5.3. ARC Marine also expect our suppliers to aspire to similar standards of fair treatment and equal opportunities for their employees.
- 5.4. ARC Marine employees are expected to report concerns to the manager, head of department or management.

6. Honest and Fair Dealing

- 6.1. We expect our suppliers to deal honestly, ethically, and fairly with the Company's clients/ customers, vendors, competitors, stakeholders, and employees. No Employee should take unfair advantage of anyone through manipulation, concealment, abuse of privilege information, misrepresentation of material facts, or any other unfair-dealing practice.
- 6.2. Suppliers shall not engage directly or indirectly in any act of corruption, fraud, money laundering, bribery and/ or any other illegal payment. All shore-based and onboard personnel shall carry out their duties in an ethical and honest manner ensuring that they always exhibit the highest standards of integrity and righteousness.
- 6.3. Suppliers should never solicit a gift or favour from those with whom we do business. Providing or receiving gifts or entertainment of moderate value (not exceeding S\$500 of value, otherwise, declare to Finance Department) motivated by commonly accepted business courtesies is permissible, but not if such gifts or entertainment would reasonably be expected to cause favouritism or a sense of obligation. In situations of uncertainty or if there are questions regarding this matter, clarification should be sought from the Finance Department.
- 6.4. Bribes, gifts, favours or other similar payments and improper benefits are strictly forbidden.

7. Conflict of Interest

- 7.1. Suppliers are prohibited from participating in or attempting to influence any decision in the presence of an actual or perceived conflict of interest. Such conflicts may arise from business interests or personal interests in the subject matter, whether economic or otherwise, either directly or through closely related individuals. It is strictly forbidden to exploit family or personal relationships to unduly influence the business judgment of either an ARC Marine employee or a Suppliers employee. In the event of awareness of a potential conflict of interest, Suppliers are required to promptly notify ARC Marine's Management.

8. Confidentiality

- 8.1. Suppliers are obligated to implement suitable measures to protect and uphold the confidentiality and proprietary nature of information belonging to their business partners. Such information should only be utilized for purposes explicitly authorized under the governing contractual agreement or, in the absence of a contractual agreement, in accordance with the understanding established for the intended purpose. In cases of subcontracting, any sharing of information with third parties must receive the explicit approval of ARC Marine, and non-disclosure agreements should be provided by the third parties involved.
- 8.2. All Supplier's employees should clearly understand that breaches could lead to disciplinary actions.

9. Safety and Health Management

- 9.1. Commitment to Health and Safety: Suppliers should be committed to providing a healthy, safe and secure environment for its employees and others (contractors, visitors and the public) that may be affected by its works and business activities without risk of injury or illness. Suppliers are obligated to comply with all statutory health, safety and environmental statutory requirements. Additionally, suppliers must employ all reasonably practicable measures to minimize or eliminate threats of terrorism, hazards, and the risk of injury to their employees, subcontractors, and other pertinent third parties, as well as the risk of damage to their property.
- 9.2. Health and Safety Management System: Suppliers are required to possess, or actively strive to establish, an effective health and safety management system that enables them to:
 - i. Identify and manage health and safety risks effectively to minimize the likelihood of accidents, injuries, or illnesses.
 - ii. Ensure adherence to regulatory requirements related to health and safety.
 - iii. Integrate health and safety considerations into the company's management structures, systems, and strategies.
 - iv. Pursue ongoing enhancements to the standards of health and safety within the workplace.
- 9.3. Safety Data Sheet and Compliance: Suppliers are required to provide the most recent Safety Data Sheet (SDS) in the 16-section format, product and warning labels following the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), loss control information, and specifications/certificates, along with details of hazardous substances and chemicals during the delivery when relevant. All goods and services supplied by the Suppliers must adhere to the latest Health, Safety, and Environmental statutory requirements. Additionally, products must display an expiry date if applicable.

10. Environmental Management

- 10.1. Compliance with Laws and Regulations: Suppliers should be dedicated to conducting its business operations in an environmentally sustainable manner, recognizing the significance of close collaboration with suppliers in effectively managing environmental risks and impacts across our supply chain. We expect our suppliers to adhere to all relevant national laws, regulations, and requirements for environmental licenses and permits.
- 10.2. Suppliers are required to establish or work towards having an effective environmental management system. This system must facilitate the oversight and control of greenhouse gas emissions, pollution prevention, energy and water efficiency, as well as responsible waste management and recycling.
- 10.3. Avoidance of harmful substances: Suppliers must not provide raw materials, parts, or products containing unsustainable substances, such as asbestos or other harmful materials that pose environmental risks or health concerns over time. Suppliers are obligated to conduct due diligence to ensure that sub-suppliers also refrain from using harmful materials in the production of supplied materials, parts, and products.
- 10.4. Promotion of Environmental-Friendly Products: Whenever feasible, suppliers are encouraged to offer environmentally-friendly products. Preference should be given to the use of environmentally-friendly packing materials.

11. Reporting of Violations of the Code

- 11.1. It is every Supplier's employee responsibility to report any suspicions or concerns about unethical, illegal, or fraudulent activities related to ARC Marine's business or its employee.
- 11.2. Any person wishes to submit a complaint, may do so via email to whistleblower@arcmarine.com.