



AS Watson

**AS Watson Group
Supplier Code of Conduct**



ASW GROUP SUPPLIER CODE OF CONDUCT

PURPOSE AND SCOPE

This Code of Conduct (“**Code**”) sets out the minimum standards for all suppliers, consultants and counterparties who supply or provide goods and services (the “**Supplier**”) to any of the AS Watson Group of companies (the “**Group**”). It is designed to promote honest and ethical conduct and to encourage trust, fair dealing and integrity in all interactions with customers, suppliers, colleagues and stakeholders.

In the conduct of its activities, the Group is committed to complying with all applicable laws, regulations, national and international conventions and undertaking best practices in the areas of ethical behaviour, social responsibility, modern slavery, responsible operations and environmental protection. The Group requires that its Suppliers do the same and respect the principles set out in this Code and ensure that their own suppliers and subcontractors do the same. References in this Code to Supplier will include the Supplier’s own suppliers and subcontractors.

The Code covers 5 key policy areas:

1. Ethical Behaviour;
2. Anti-bribery and Corruption;
3. Observance of the BSCI Code of Conduct and the Mekong Club Business Pledge;
4. Sustainability; and
5. Social Media and Public Statements.

NON-COMPLIANCE WITH THE CODE

Non-compliance with this Code by the Supplier may result in the Group reviewing the business relationship. The Group may decline to start or continue any relationship if it believes this Code has not been adhered to or will not be adhered to. Any non-compliance with this Code by a subcontractor of a Supplier or by Supplier’s own suppliers will be considered as a non-compliance by the Supplier.

If you wish to report any non-compliance under this Code, you can contact your usual business contact at the Group. Alternatively, you may contact the General Manager, GMS, CKHH at report@chk.com.hk or at 48/F, Cheung Kong Centre, 2 Queen’s Road Central, Hong Kong.



1. ETHICAL BEHAVIOUR

Dealing fairly, honestly and with integrity, with employees, customers, suppliers, competitors and governmental authorities is fundamental to the Group's principles and values. The Group requires that its Suppliers act with utmost integrity in the conduct of their business.

1.1 Confidentiality

The Group's Suppliers must undertake all necessary measures to protect the confidentiality of business sensitive information (such as financial data, sales data, marketing and strategic plans) and other non-public information that they receive in the course of their business relationship with the Group. This information is confidential and Suppliers must not:

- divulge it to anyone outside the Group (except as required by law or as expressly agreed in advance by the Group);
- use it for personal or financial gain or to compete with the Group;
- use it to engage in inside trading activities.

1.2 Accurate and Honest Reporting

The Group requires its Suppliers to provide honest and accurate information regarding: the goods and services provided to it, production methods, resources used or production facilities, traceability of products (and their ingredients), labelling and descriptions of products. Suppliers must not make any misleading statements to the Group.

1.3 Conflict of Interest

The Group requires its Suppliers to make every effort to prevent the occurrence of situations that create a conflict between its interests and those of the Group.

1.4 Group Intellectual Property Rights

The Group requires that its Suppliers undertake all necessary measures to protect the resources and assets of the Group, in particular its intellectual property rights and is committed to fighting counterfeiting by:

- cooperating with law enforcement and intellectual property administration departments;
- undertaking preventive measures such as requiring its Suppliers to destroy all counterfeited products seized by it or by law enforcement departments or as directed by the Group.



1.5 Data Privacy

The Group respects the privacy rights of the Group's employees, customers and other stakeholders. The Group requires its Suppliers to comply with all applicable laws and regulations concerning the protection of personal data, to safeguard any personal data entrusted to it and to implement technical and organisational measures including appropriate security for hardware and software systems to ensure such personal data is secured from unauthorised or unlawful disclosure.

1.6 Competing Fairly

The Group's customers, Suppliers and stakeholders expect us to compete fairly and independently and to promote fair competition. Accordingly, Suppliers should not engage in anti-competitive practices such as price fixing, market sharing, bid-rigging, output restriction, group boycott, information sharing and/or abuse of a dominant market position to reduce competition.

1.7 Proceeds of crime and trade restrictions

The Group requires its Suppliers to take all reasonable measures to follow internationally recognised principles relating to anti-money laundering, trading restrictions, export control, and not dealing with sanctioned countries, companies and individuals.

2. ANTI-BRIBERY AND ANTI-CORRUPTION

2.1 Prohibition of all forms of corruption and bribery

The Group operates a zero-tolerance policy which strictly prohibits any form of bribery or corruption. The Group requires its Suppliers to adopt the same policy concerning bribery, corruption or trading in influence and to take appropriate measures to prevent, detect and sanction any corruption, bribery or trading in influence, either directly or indirectly, in their business activities. The Group promotes fair and transparent procurement practices and will not deal with Suppliers known to be paying bribes and/or engaging in corrupt activity and requires its Suppliers to adopt the same approach.

2.2 Business Courtesies

The Group acknowledges that the giving and receiving of modest gifts, entertainment, hospitality, or other business courtesies is an important part of building relationships with other parties in certain territories. However, any business courtesies that might be perceived to unfairly influence a business relationship should be avoided.



3. BSCI CODE OF CONDUCT AND MEKONG CLUB MODERN DAY SLAVERY BUSINESS PLEDGE

The Group is committed to observing the principles as set out in the BSCI Code of Conduct and is a member of the Mekong Club Business Pledge against modern slavery. The principles under the BSCI Code of Conduct are found under the link (<https://www.amfori.org/content/bsci-code-conduct>) and the Business Pledge against Modern Slavery as set out by the Mekong Club are found under the link (<https://themekongclub.org>).

The Group requires its Suppliers to observe and comply with the principles as set out in the BSCI Code of Conduct and the Mekong Club Business Pledge.

4. SUSTAINABILITY

4.1 ASW Sustainability Programme

The Group is strongly committed to supporting its environmental, social and governance (together, “**Sustainability**”) programme, not just to its shareholders, but also to a wide range of stakeholders including customers, suppliers, employees, creditors, regulators and the wider community. Taking a proactive approach to Sustainability is not only a part of the Group’s long and distinguished heritage, inherent in the corporate strategy of the Group, and crucial to the Group’s long term success. The Group believes that a strong Sustainability programme contributes positively to the development of the employees, customers, environmental protection and the communities in which the Group operates.

4.2 Sustainability Practices and Principles

The Group expects its Suppliers to take an equally responsible approach to Sustainability and as a minimum to adopt the following practices and principles:

Environmental

- Abide by all relevant local and national legislation and in a manner that ensures environmental preservation and human rights compliance.
- Minimise the consumption of energy and the carbon footprint of operations through the implementation of environmental policies and environmental management systems.
- Develop a climate action strategy, by setting science-based targets and implementing the required interventions to meet such targets.
- Encourage the use of environmentally friendly technology that can reduce energy consumption minimise the need for business travel, and reduce reliance on non-renewable resources such as virgin plastic.



- Expand the development of more environmentally friendly products, minimising the use of natural resources and helping customers to lead a more sustainable lifestyle.
- Promote the recycling of waste, whilst taking the responsible precautions on the handling or disposal of any hazardous materials in operations.

Social

- Undertake a range of philanthropic efforts that are catered to the needs and benefits of the communities where it operates, through for example employee volunteerism, education, medical support, health and elderly care, and disaster relief.
- Create a safe, healthy, supportive, diverse and discrimination-free working environment.
- Encourage its employees to play a positive and active role in the communities where they live and work.

Governance

- Ensure a strong Board oversight on the company's sustainability targets and performance.
- Establish policies covering key Sustainability requirements.
- Share progress on Sustainability priorities as set by the company.

5. SOCIAL MEDIA AND PUBLIC STATEMENTS

5.1 Public Statements

To protect the Group's image and effectively manage communications, any public statement by a Supplier which is attributed to the Group or discloses the Group's involvement in any dealings with the Supplier, must be approved by the Group prior to its release to the public.

5.2 Use of Social Media

The Group requires its Suppliers to be measured in their social media usage and statements so as to ensure that any such use or statements are not attributable to the Group, unless the Group has provided its express prior written consent.