



**Policy**

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**Supplier Code of Conduct**

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## A. Objective

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- Link Asset Management Limited (“**Link**”) commits to, amongst other good corporate practices upholding ethical business conduct, compliance with applicable laws, regulations and policies in all jurisdictions of our operations, as well as contributing to our environment, communities, and staff with positive impact.
- This Supplier Code of Conduct (“**Code**”) should be adopted in conjunction with our Procurement Policy and Procurement Standard Operating Procedures.

## B. Policy Scope

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- This Code sets out the standards of conduct expected to be followed and adopted by all suppliers, contractors, subcontractors, and consultants (**collectively, “Suppliers”**) who provide goods and/or services for Link.
- Suppliers should use reasonable endeavours including but not limited to policy and procedures implementation, training programmes, as well as publications in local language to ensure the provisions of this Code are communicated and kept accessible to their staff, directors, and Suppliers where applicable.

## C. Policy Content

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### 1. Legal and Regulatory Requirements

- Suppliers shall operate their business activities in full compliance with all applicable laws, regulations, and statutory codes in Hong Kong and/or other jurisdictions of their operations.

### 2. Corporate Governance and Social Integrity

#### Bribery & Corruption

- Suppliers are prohibited from any form of bribery, corruption, fraud, extortion, kickbacks, and grease payments.
- Suppliers shall not solicit or accept advantages such as gift, loan, money, employment, and contract, whether financial or non-financial, that may or appear to influence decisions in business dealings.

#### Money Laundering & Terrorist Financing

- Suppliers must not engage in any activities that may involve Link in money laundering and terrorist financing.

#### Conflict of Interest

- Suppliers shall report to Link promptly for any actual, potential, or perceived conflict of interest where it may affect the transaction.

#### Whistleblowing

- Suppliers shall ensure effective communication mechanisms for staff, including grievance and whistleblowing procedures to handle workplace complaints and concerns.
- Suppliers shall protect staff who report in good faith from retaliation.

#### Privacy & Confidentiality

- Suppliers shall protect privacy of any personal data, and confidential information assets they obtain in the course of business relationship with Link in respect of processing, storage, transfer, disclosure, and destruction.

#### Forced & Child Labour

- Suppliers are prohibited from forced, coerced, bonded, indentured, trafficked labour, or any other forms of modern slavery.
- Suppliers must not employ staff who are younger than the minimum legal working age. Where youth apprenticeships are relevant, Suppliers shall ensure such programmes are recognised as legitimate.

#### Compensation & Working Hours

- Suppliers must enter into written employment contracts with their staff and Suppliers. Wages, benefits, pay structures, and pay periods shall be communicated clearly and executed promptly.
- Suppliers must provide at least statutory minimum wages and any legally entitled benefits to staff.
- Suppliers are encouraged to compensate staff for overtime hours at a rate required legally at minimum. All overtime must be voluntary and does not exceed the legal working hour limits.
- Suppliers shall grant staff mandatory rest days, annual leaves, sick leaves, and maternity or paternity leaves as stipulated by local laws without any form of repercussions.

#### Workplace Health and Safety

- Suppliers must apply and obtain all necessary occupational health and safety permits/licenses that remain valid during operations.
- Suppliers shall provide facilities and amenities such as potable water, sanitary facilities, fire safety, ventilation, and lighting that meet the legal requirements of a healthy and safe workplace.
- Suppliers shall ensure their staff understand obligations of safeguarding wellbeing and safety for themselves and other related parties during work. Regular training and adequate resources shall be provided along when Suppliers communicate their own health and safety policies and management systems to staff.
- Suppliers shall identify, monitor, and minimise occupational risks resulting from their operations and adopt follow-up actions after accident/incident investigation where needed.

#### Diversity and Inclusion

- Suppliers must treat all staff with respect and dignity where physical, sexual, verbal, psychological harassment and threats shall be prohibited.
- Suppliers shall not tolerate any form of discrimination in hiring and employment practices on the basis of gender, race, nationality, age, sexual orientation, marital/family status, pregnancy, religion, disability, political opinions, or similar. Suppliers are encouraged to embrace diversity and nurture upward social mobility among vulnerable groups.

#### Freedom of Association and Collective Bargaining

- Suppliers shall respect the rights of staff to form and join (or refrain from joining) trade unions and associations of their choice in compliance with local statutory requirements.
- Where staff represent or are being represented during collective bargaining, Suppliers shall bargain in good faith with the representatives.

### **3. Environment**

- Suppliers must apply and obtain all necessary environmental registrations, approvals, and permits/licenses that remain valid during operations.
- Suppliers shall observe proper consideration of safety and environmental impact in handling, transportation, storage, as well as disposal methods of hazardous materials, chemicals, and waste.
- Suppliers are encouraged to adopt their own policies and management systems to identify, monitor, and disclose the environmental impacts resulting from their operations and take measures to improve their environmental performance progressively. These shall include but not limited to the following areas:
  - i. Energy and Carbon Reduction
  - ii. Waste and Resource Conservation and Recycling
  - iii. Water Management
  - iv. Pollution Control
  - v. Sustainable Procurement

### **4. Reporting and Review**

- Suppliers shall identify, monitor, and rectify any activities that have fallen below the standard of this Code as soon as possible and ensure their continued compliance.
- Suppliers shall retain all documentation records that demonstrate their compliance with this Code and allow Link access to relevant documents and conduct on-site inspections where needed.
- If Link determines that the Suppliers have breached this Code, Link may require the Suppliers to carry out remedial actions. In case of serious breaches, Link reserves the rights to suspend or terminate contracts with the Suppliers and/or to claim losses and damages caused.
- This Code will be regularly reviewed considering legislative changes, organisational changes, and development in sustainability best practices, or at a minimum, every three (3) years.