



THE HBX GROUP SUPPLIER CODE OF CONDUCT GUIDANCE FOR SUPPLIERS TO HBX GROUP AND ITS SUBSIDIARIES (“HBX GROUP”)

1. Introduction

HBX GROUP is committed to sustainable, ethical business in compliance with applicable laws, conventions and regulations. Maintaining integrity in dealings with employees, business partners, shareholders and the general public is an indispensable part of the HBX GROUP culture and essential to maintaining high morale and producing fair, reliable and innovative products and services.

HBX GROUP adheres to an internal Code of Conduct as well as policies and procedures orienting our own daily activities and actions. HBX GROUP seeks to support efforts to protect human rights and strives to develop appropriate, environmentally and socially sustainable chains of responsibility and response mechanisms within our sphere of influence.

1.1. Scope

This Supplier Code of Conduct serves as guidelines to a standard of ethical conduct, values and principles HBX GROUP expects Suppliers to adhere to when dealing with workers, agents, suppliers, and customers on HBX GROUP behalf.

This Supplier Code of Conduct (“this Code”) sets out the minimum standards HBX GROUP expects from Suppliers and their employees, contractors, agents and subsidiaries when working on HBX GROUP behalf.

Suppliers to HBX GROUP are expected to uphold our principles by: adopting accessible and clear policies and procedures to respect human rights and labour law; supporting local communities; identifying and monitoring bribery and corruption risks; identifying and monitoring negative environmental impacts; and introducing/maintaining Quality Assurance and Health and Safety policies and procedures in their businesses where possible.

Suppliers should ensure compliance with the provisions in this Code, and where they cannot ensure compliance, actively promote this Code (for example to their sub-contractors and suppliers).

However, the provisions of this Code are guidelines and are distinct from any contractual agreement between HBX GROUP and the Supplier. Responsibilities of Suppliers set out herein can be contractually enforceable only in so far as provided for by the legal relationship created between Suppliers and HBX GROUP.

2. Principles

2.1. Anti-corruption

When entering into any agreement or collaboration with HBX GROUP:

Business integrity

Suppliers shall:

- » accurately and fully disclose to the HBX GROUP entity any requested or relevant information regarding their business activities, structure, financial situation and performance on HBX GROUP behalf, which may affect the performance of their contract with HBX GROUP, in accordance with applicable laws, regulations and industry practices; and
- » uphold fair business standards in advertising, sales, and competition when dealing on HBX GROUP behalf

Prohibition of bribery and corruption

Suppliers shall:

- » comply with the provisions of the UN Global Compact, the UK Bribery Act 2010, the US Foreign Corrupt Practices Act 1977, applicable national anti-corruption regulations and legislation, and international anti-corruption conventions as in force from time to time in so far as such provisions are applicable to the Supplier's work on HBX GROUP behalf.

Suppliers shall not:

- » offer or accept bribes or other means to obtain an undue or improper advantage on behalf of HBX GROUP;
- » try to influence the making and taking of business decisions through the acceptance or offer of favors, benefits, gifts or other hospitality which is either disproportionate or outside the ordinary course of business; and
- » engage in corruption, extortion, or fraud in any form

2.2. Working conditions

General rights of workers

Suppliers shall:

- » treat workers with dignity and respect as understood and defined by the International Labour Organisation or applicable law;
- » ensure workers can easily access relevant information on their employee rights; and
- » ensure that third-party agencies providing workers are compliant with the laws of the sending and receiving countries, whichever is more stringent in its protection of workers.

2.3. Working conditions

General rights of workers

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Prohibition of forced and involuntary labour

Suppliers shall not:

- » employ anyone against their will;
- » traffic in persons or use any form of slave, forced or bonded labour;
- » require workers to surrender any government-issued identification, passports, or work permits as a condition of employment; or
- » require workers to undergo excessive indebted labour: that is, where workers are required to pay a fee in connection with obtaining employment, expenses associated with recruitment, processing, or placement of both direct and contract workers, Suppliers shall be responsible for payment of fees and expenses in excess of an affordable portion of a worker's salary (a guide being one month of the worker's anticipated net wages).

Suppliers shall:

- » ensure there is no slavery or human trafficking in their business or supply chain and comply with applicable legislation in respect of modern slavery, including the Modern Slavery Act 2015 in the United Kingdom;
- » ensure their employees are free to enter their employment through their own choice and leave work or terminate their employment with reasonable notice, without penalty;
- » ensure that correct visa and working documentation are in place for any recruited employees;
- » ensure that written contracts for both direct and contract workers exist, which clearly convey the conditions of employment in a language understood by the worker; and
- » promptly inform the appropriate authorities where they reasonably suspect that any individuals associated with their businesses are at risk of human trafficking or similar exploitation

Child labour

Suppliers may employ juveniles who are younger than 18 years of age, provided:

- » they are employed in accordance with country law and regulations or the UN Convention on the Rights of the Child, whichever provides the most protection;
- » the Supplier respects ILO Conventions No. 138 and 182 (see www.ilo.org);
- » children are not employed to undertake inappropriate work normally undertaken by adults and there are age-appropriate working conditions for children working within the business;
- » children do not perform work likely to jeopardize their health, safety or morals; and
- » the Supplier monitors employees under the age of 18, their working times and any special working conditions relating to the job that they are undertaking.

Child protection from sexual exploitation

Suppliers shall:

- » refuse, repress and condemn commercial exploitation of human beings, in all its forms, specially commercial sexual exploitation and specifically when it affects children and adolescents;
- » implement preventative measures and procedures to ensure that children are protected from tourism-related sexual exploitation and all potential forms of abuse;
- » be able to demonstrate (for example through policies, training and/or staff communications) how children are protected from tourism-related sexual exploitation or other relevant potential forms of abuse, exploitation and harassment which children could be exposed to by their business;
- » train relevant employees on the protection of minors from tourism-related sexual exploitation including how to report incidents to the local authorities; and
- » report any incidents and shall raise awareness of any identified risks to child safety involving guests and/or employees on or near the premises to the relevant local authorities.

Anti-discrimination

Suppliers shall:

- » ensure that employees are not discriminated against in hiring practices such as applications for jobs, promotion, reward, access to training and senior positions, job assignments, conditions of employment including wages, benefits, discipline or termination on the basis of their gender, race, age, disability, ethnicity, religion/beliefs, or sexual orientation;
- » extend employment opportunities to indigenous populations where possible; and
- » not require workers to undergo pregnancy tests except where required by applicable laws or regulations or prudent for workplace safety.

Working times and remuneration

Suppliers shall:

- » ensure that working hours comply with applicable national law or industry standards, whichever affords employees the most protection;
- » be able to demonstrate that they pay employees a wage equal to or above the legal minimum;
- » provide as a minimum all legally mandated benefits, vacation time, leave periods, and holidays;
- » pay workers in a timely manner and clearly convey the basis on which workers are paid; and
- » not use deductions from wages as a disciplinary measure.

2.4. Health and Safety

Suppliers agree to work with HBX GROUP implementing HBX GROUP Health and Safety policy and minimum standards, applicable laws, regulations and codes of practice including those relating to hygiene, fire, safety, security of persons, planning and licensing.

Health and Safety Controls

Alongside any contractual obligations of the Supplier, Suppliers shall;

- » anticipate, identify, evaluate, and control risk including emergency situations and events;
- » implement emergency plans and response procedures, including emergency reporting, worker notification and evacuation procedures, worker training and drills, appropriate first-aid supplies, appropriate fire detection and suppression equipment, adequate exit facilities, and recovery plans;
- » provide adequate heat and ventilation;
- » provide appropriate controls where chemical, biological, and physical hazards cannot be eliminated; and
- » i. ensure that any services provided to the HBX GROUP customer are safe and fit for purpose.

Working conditions

Suppliers shall commit to creating safe working conditions and a healthy work environment for all of their workers and shall:

- » ensure that sufficiently high standards of hygiene and sanitation are maintained on their premises;
- » implement work safety guidelines and procedures and educate their employees, agents and contractors accordingly to reduce and prevent accidents and occupational illness;
- » provide workers with clean and safe toilet facilities, access to potable water, and if applicable, sanitary food preparation and storage facilities;
- » ensure any provided worker living accommodation shall be clean and safe; and
- » not discipline workers for raising safety concerns.

Safety systems and training

Suppliers shall anticipate, identify, evaluate, and control worker exposure to physically demanding tasks, and shall:

- » provide workers with appropriate workplace health and safety information and training in the primary language of the workers;
- » post, in the primary language of its workers, Material Safety Data Sheets for any hazardous or toxic substances used in the workplace;
- » train workers who will come into contact with dangerous conditions in the workplace;
- » establish procedures and systems to manage, track, and report occupational injury and illness;

- » investigate cases and implement corrective actions to eliminate their causes;
- » provide, facilitate or if they cannot provide or facilitate, authorise, allow and not obstruct worker access to necessary medical treatment without delay; and
- » facilitate workers' return to work.

2.5. Environment and the Community

Environments and the Community

Suppliers shall:

- » commit to reducing their overall environmental impact, while engaging the community to help foster social and economic development;
- » support HBX GROUP commitment to sustainability as evidenced by HBX GROUP Corporate Sustainability Policy;
- » contribute to the sustainability of the communities in which they operate, with progress assessments on community issues in line with industry standards;
- » commit to engage actively in aiming to reduce energy and water consumption; and
- » (implement purchasing policies and procedures which favour sustainable and locally produced goods and services in preference to imported products wherever possible and reasonable.

Permits, policies and procedures

Suppliers shall:

- » (maintain a register of applicable international, national and local requirements in relation to the environment containing current copies of all licences and permits; and
- » monitor their activities to ensure that their products, services and procedures comply with revisions and new legislation or codes which may from time to time apply to business they conduct on HBX GROUP behalf.

Commitment to reduction of environmental hazards

Suppliers shall

- » monitor, control, and treat and shall endeavour to reduce or eliminate solid waste, wastewater, environmentally damaging chemicals, and air emissions as required by applicable laws and regulations, including energy-related indirect air emissions, by: implementing appropriate conservation measures in their production, maintenance, and facilities procedures; and recycling, reusing, or substituting materials.

2.6. Information Security

Suppliers shall:

- » implement appropriate confidentiality measures to protect the privacy of customers, clients and employees; and

- » safeguard customer, client and employee information and the transfer of technology, services and know-how in a manner that protects any applicable international, national and local intellectual property and data protection rights.

2.7. Implementation

Suppliers shall have a procedure for timely correction of any deficiencies identified by their own internal or external audit, investigation or review. It is all Suppliers' responsibility to ensure that they operate within and meet all international, national and local legislative and regulatory requirements, applicable international conventions and standards that may from time to time apply to them.