

CTCI Vendor Code of Conduct

CTCI (consisted of the CTCI Group Companies as listed on CTCI official website <u>https://www.ctci.com/</u>) is committed to the highest standards of social and environmental responsibility and ethical conduct, and we expect our vendors to adopt the same policy. CTCI's vendors are required to operate in accordance with the principles in this CTCI Vendor Code of Conduct and in full compliance with all applicable laws. This Code applies to CTCI vendors and their subsidiaries, affiliates, and subcontractors providing goods or services to CTCI.

1. Labor and Human Rights

Vendors are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

1.1 Freely Chosen Employment

Forced, bonded (including debt bondage) or indentured labor or involuntary prison labor: slavery or trafficking of persons shall not be used.

1.2 Child Labor Avoidance

Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person employed under the age of 14 (where the law of the country permits).

1.3 Working Hours

The regular working hours shall not exceed the maximum regular working specified in the local law.

1.4 Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates.

1.5 Humane Treatment

There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers.



1.6 Discrimination

Vendor will not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices.

1.7 Freedom of Association

Vendor will comply with all applicable local and national laws on freedom of association and collective bargaining. Workers shall be able to openly communicate with management regarding working conditions and management practices.

2. Safety and Health

To prevent work-related incidents, Vendors shall encourage employees to receive related occupational safety and health trainings and enhance their awareness and ability. Assess the hazards from facilities, equipment, machinery and tools, and arrange proper safety controls to prevent injuries. In addition, create a safe and health work environment and endeavor to achieve zero fatality and injury target to promote physical and mental health.

2.1 Life Saving Rules

Life-Saving Rules is important requirements in project HSE management, the rules are used to demonstrate management leadership and commitment to an uncompromising safety culture. In order to strengthen safety awareness of workers, vendors shall ensure the effective implementation of all requirements and strictly require workers to follow live saving rules to mitigate risk and prevent injuries.

2.2 Occupational Safety

Vendors shall insist on safety as the first priority, establish and implement safety operation procedures, provide suitable trainings for workers to ensure project engineering, procurement, construction, and commissioning are in line with safety.

2.3 Occupational Health

Vendors shall actively promote a healthy workplace, provide protection and care for workers and identify health hazards at work. By using the general principles of the hierarchy of control, engineering, administrative procedure, and personal protective equipment against the risks to prevent occupational diseases and illness.



2.4 Behavior-Based Safety

Vendors shall discover and analyze worker's unsafe behaviors and status by using behavior-based safety(BBS) to reduce the frequency of unsafe behaviors and status.

2.5 Emergency Preparedness

Vendors shall identify potential emergency situations and implement necessary arrangements to minimize the impacts of emergency situations. Arrangements for emergency preparedness include: training, fire detection and firefighting equipment, emergency preparedness plan, emergency report, drill, evacuation and recovery plan...etc.

2.6 Occupational Injury and Illness

Vendors shall develop management procedure to prevent, management, track and report occupational injury or illness. The procedure include: encourage reporting of incident, record management, provide medical care, investigate the incident and take improvement actions to prevent repetitive injury, assist workers getting back into work...etc.

3. ENVIRONMENTAL

Vendors recognize that environmental responsibility is integral to manufacturing, producing or providing services. In these operations, providing professional services which are in full compliance with environmental protection requirements; promoting energy saving, carbon reduction, and pollution prevention; minimizing adverse effects on the environment; and promoting environmental protection and sustainable development with interested party shall be implemented.

3.1 Environmental Permits and Reporting

Vendors shall acquire environmental permit, approval, registration or reporting documents according to the scope of contracted work, local regulations, and owners requirements before the work star. In addition, the mentioned documents shall be maintained and revised as required in order to comply the regulations during the work.

3.2 Pollution Prevention and Resource Reduction

Vendor shall comply with requirements of environmental protection through modifying production, maintenance and facility processes, substitution with qualified and eco-friendly materials, conservation, recycling and re-using materials and reduce any kinds of waste of resources.



3.3 Hazardous Substances

Vendor shall identify and control dangerous and hazardous substances to ensure compliance with international standard and local laws during engineering, producing, importing, transporting, storage, use, recycling, and disposal.

3.4 Wastewater and Solid Waste

Vendor shall characterize, monitor(ensure to comply with emission standards), control and treat wastewater and dispose solid waste generating from operations, industrial processes and sanitation facilities prior to discharge or dispose.

3.5 Exhaust Emissions

Exhaust emissions, i.e. volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored(ensure to comply with emission standards), and treated as required prior to discharge.

3.6 Net Zero

The vendor is aware of Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions to be tracked and documented, and publicly reported against the greenhouse gas reduction goal. The vendor understands the necessity of looking for methods to improve energy efficiency and minimizing their energy consumption and greenhouse gas emissions.

3.7 Biodiversity and zero deforestation

The vendor is willing to assess and report on their dependencies and impacts on biodiversity, from local to global, as well as willing to make a zero deforestation commitment, to progressively reduce negative impacts, and increase positive impacts, reducing biodiversity-related risks to the vendor and moving towards the full sustainability of extraction and production practices, sourcing and supply chains, and use and disposal.

4. ETHICS

To meet social responsibilities and to achieve success in the marketplace, Vendors and their agents are to uphold the highest standards of ethics including:



4.1 Avoiding Conflicts of Interest

Conflicts of interest, such as situations where a CTCI employee or a close relative (parent, child, spouse or sibling) is a significant investor or shareholder in your company (as non publicly traded stock), should be avoided to prevent misconduct. Excessive or overly-frequent socializing with your CTCI business contacts may also create a conflict of interest, or the appearance of a conflict of interest. Social contact must be within accepted cultural business norms, and relationships that become conflicts of interest must be reported. If a potential conflict is discovered, you should report such incident immediately to CTCI and take corrective actions to ensure that no inappropriate actions result from the conflict and relationships that become conflicts of and suspended or resolved.

4.2 Business Integrity

The highest standards of integrity are to be upheld in all business interactions. Vendors shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

4.3 No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted.

4.4 Disclosure of Information

Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentations of conditions or practices in the supply chain are unacceptable.

4.5 Intellectual Property

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights.

4.6 Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld.

4.7 Privacy

Vendors are committed to protecting the reasonable privacy expectations of personal information of everyone vendors do business with, including suppliers, customers, consumers and employees. Comply with privacy and information security laws and



regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

4.8 Responsible Sourcing of Minerals

Materials used are not sourced from controversial mining area.

5. MANAGEMENT

Vendor shall establish a management system whose scope is related to the regulation and content of this Code.

5.1 Management Accountability and Responsibility

The vendor clearly identifies senior executive and company representatives responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.

5.2 Legal and Customer Requirements

A process to identify, monitor and understand applicable laws, regulations and customer requirements.

5.3 Risk Assessment and Risk Management

A process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

5.4 Improvement Objectives

Written performance objectives, targets and implementation plans to improve the vendor's social and environmental performance, including a periodic assessment of vendor's performance in achieving those objectives.

5.5 Training

Programs for training managers and workers to implement vendor's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.



5.6 Audits and Assessments

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.

5.7 Corrective Action Process

A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

5.8 Documentation and Records

Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.