

VENDOR CODE OF CONDUCT

1. INTRODUCTION

SEM and its subsidiaries (collectively referred to as “SEM Group”) is committed to conducting its business in an ethical and socially responsible manner as well as in compliance with applicable laws and regulations. Similarly, SEM Group expects its vendors to operate and to act in a lawful, ethical and professional manner, and hence the development and implementation of this Vendor Code of Conduct (“Vendor Code”).

An electronic version of this Vendor Code is available on 7-Eleven’s website.

1.1 Scope and Applicability

This Vendor Code outlines a set of obligations and standards on business and ethical practices as well as professional conduct expected of all vendors throughout their conduct of business with SEM Group.

This Vendor Code shall apply to all existing or new vendors of SEM Group, which consist of suppliers, service providers, contractors, consultants, and agents, and to any person(s) appointed by them in any capacity, including their employees, agents, suppliers, and sub-contractors, to supply goods or perform any part of work or services for or on behalf of SEM Group (collectively referred to as “Vendors”).

In the event of inconsistency between this Vendor Code and the terms of any relevant contract with Vendors, the terms of that contract shall prevail only with respect to such inconsistency.

1.2 Compliance

Vendors are expected to understand and comply with this Vendor Code throughout their conduct of business with SEM Group. Compliance with this Vendor Code will be one of the important criteria taken into consideration by SEM Group when making decisions in procurement, cooperation, and contract renewal.

In order to verify compliance with this Vendor Code, SEM Group and/or its authorised representative may audit Vendors and /or request further information from Vendors from time to time.

Any violation of this Vendor Code may result in contractual and/or legal remedies under the law, including but not limited to termination or suspension of contract, non-renewal of contract, disqualification from participating in any procurement exercise, and/or other appropriate actions (where applicable).

1.3 Reporting of Violation

Any Vendors or party with knowledge of an actual or potential irregular business dealing or violation of this Vendor Code can share their concern or report such matter in confidence through the whistleblowing channel as follows:

- (i) Email: whistleblower@7eleven.com.my;
- (ii) Mail: Head of Internal Audit
7-Eleven Malaysia Sdn Bhd
08-66, Level 8, Berjaya Times Square,
No.1, Jalan Imbi, 55100 Kuala Lumpur.

Please refer to SEM Group's Whistle-blowing Policy and Procedures on 7-Eleven Malaysia's website for further details.

1.4 Review and Amendment

SEM Group reserves the right to continuously review and amend this Vendor Code at any time where and when needed, and thus, this Vendor Code is subject to modification from time to time.

2. PRINCIPLES

This Vendor Code consists of -five (5) main principles:

- Business integrity and ethics;
- Accountability;
- Workplace practices and culture;
- Environmental responsibility; and
- Effective management systems.

3. BUSINESS INTEGRITY AND ETHICS

Vendors shall adhere to the highest standard of professionalism, business ethics and integrity, and good governance, including but not limited to the following, in all business interactions and dealings with SEM Group:

3.1 Anti-Bribery/Corruption

- (a). SEM Group has put in place its Anti-Bribery & Anti-Corruption Policy and Procedure, compliance of which is mandatory by Vendors.
- (b). Vendors shall adopt a zero-tolerance policy against all forms of bribery and corruption, and shall implement an effective anti-bribery and anti-corruption compliance programme, in line with the applicable laws and regulations, to prevent bribery and corruption from occurring in all activities that may arise during the course of doing business with or on behalf of SEM Group.
- (c). Vendors are prohibited from promising, offering, giving, soliciting or accepting, directly or indirectly, any form of bribes, kickbacks or any other unlawful/unethical/improper benefits that may give rise to bribery, corruption or suspicion of such conduct.

Vendors are advised to refer to SEM Group's Anti-Bribery & Anti-Corruption Policy and Procedure on 7-Eleven Malaysia's website for further details.

3.2 Conflict of Interest

- (a). Vendors shall be honest and shall avoid any conduct that may give rise to a conflict of interest, whether actual, potential or perceived, throughout their business engagement with SEM Group.
- (b). Vendors are obliged to declare any conflict of interests (including any family member connection) prior to establishing or entering into a relationship or new relationship with SEM Group or when the need arises.

3.3 Honest Representation

Vendors are prohibited from misrepresenting, including but not limited to, their organisation, qualifications, experiences and capacities in the goods supplied or services rendered to SEM Group.

3.4 Information Disclosure

- (a). All business transactions between Vendors and SEM shall be transparent, as well as accurately recorded in accordance with applicable laws and general industry practices.
- (b). Vendors shall disclose relevant information and records (including, without limitation, those concerning business activities, organizational structure, financial status and performance, social and environmental sustainability) to SEM Group and/or its authorised representative, and shall not falsified such information and/or records, for the purpose of carrying out an audit or upon request by SEM Group.

3.5 Confidentiality of Information and Data Protection

- (a). Vendors shall not disclose to any third party any confidential information made available by SEM Group related to the business and affairs of SEM Group without obtaining SEM Group's prior consent in writing.
- (b). Vendors shall implement appropriate controls and procedures to safeguard confidentiality of information and to prevent any information leakage.

3.6 Governance and Compliance

Vendors shall strictly comply with all applicable laws and regulations as well as SEM Groups' policies while conducting business with or on behalf of SEM Group.

4. ACCOUNTABILITY

Vendors shall be fully accountable for goods supplied or services rendered, and shall honour their commitment timely in accordance with the terms and conditions agreed under the specific contract with SEM Group.

5. WORKPLACE PRACTICES AND ENVIRONMENT

Vendors shall be responsible for the safety of all their employees and others involved on or affected by their businesses and operations. At a minimum, Vendors shall strictly adhere to all applicable laws and regulations in relation to workplace practices and environment.

5.1 Employment Practices

Vendors are encouraged to promote and support employment practices that adhere to the applicable laws and regulations and policies on protecting human rights, which include but not limited to the following:

- (a). Vendors shall prohibit the use of all kind of slavery, forced labour, human trafficking and child labour;
- (b). Vendors shall not allow sexual and other harassment or inhumane treatment in workplace;
- (c). Vendors shall prevent discrimination on grounds of gender, age, race, religion, disability, political opinion, nationality, marital status, pregnancy and/or others, and shall promote equality of opportunity and fair treatment, in hiring and other practices such as promotions, rewards, access to training, termination or retirement, etc.;
- (d). Vendors shall ensure that work hours for their employees are not excessive and are in compliance with the applicable laws and regulations;
- (e). Vendors shall pay fair wages and other entitlements, which are commensurate with at least the minimum legal standards or existing industry benchmark standards, to their employees in a timely manner; and
- (f). Vendors shall adopt an open attitude and respect their employees' right to freedom of association and collective bargaining.

5.2 Workplace Safety and Health

- (a). Vendors shall ensure that all works undertaken are in compliance with all applicable laws and regulations, as well as all relevant requirements and/or guidelines imposed by the local authorities, relating to safety and health.
- (b). Vendors shall provide their employees with a safe, healthy and hygienic working environment.
- (c). Vendors shall have put in place their safety policy and/or emergency preparedness and response procedures, which are in line with the applicable laws and regulations as well as the generally accepted industry practices, to ensure the safety and health of their employees.
- (d). Vendors shall take adequate steps and control measures to mitigate safety and health risks in workplace, as well as to prevent or reduce, so far as is

reasonably practicable, the occurrence of accidents and injury to health arising out of, associated with, or occurring in the course of work.

- (e). Vendors shall provide their employees with necessary health and safety information and regular training in the language understood by their employees.

6. ENVIRONMENTAL RESPONSIBILITY

Vendors are encouraged to operate in an environmentally responsible manner and to make commitment in managing, mitigating or minimizing adverse impacts associated with their business activities on the community, environment and natural resources.

6.1 Environmental Compliance

Vendors shall strictly adhere to all applicable environmental laws and regulations throughout the products or services life cycle. This includes:

- (i) To properly obtain, keep, maintain and record all necessary permits, approvals and/or records;
- (ii) To operate in accordance with the local laws as well as the internationally recognized standards generally accepted in the relevant industry in relation to, among others, waste disposal, air emission, discharge of toxic substances and/or hazardous waste, etc.; and
- (iii) To prohibit or restrict the inclusion of specific or illegal substances to ensure safe and responsible handling, storage, movement, reuse, recycling and disposal.

6.2 Environmental Management Systems

Vendors are encouraged to implement effective and innovative environmental management systems, detailing the process of managing their environmental impacts and taking steps as appropriate, such as:

- (i) Responsible use of natural resources, water and energy;
- (ii) Ethical and responsible sourcing of materials;
- (iii) Use of non-toxic chemicals;
- (iv) Resource conservation and recycling;
- (v) Implementation of comprehensive waste management system to manage, reduce, reuse and/or prevent waste;
- (vi) Pollution prevention;
- (vii) Adoption of environmentally friendly technologies; and

- (viii) Implementation of climate change impact measurement and biodiversity impact assessment.

7. EFFECTIVE MANAGEMENT SYSTEMS

Vendors are encouraged to institute effective management systems, which should include the process for identification, management and mitigation of ethical, social, safety and health, and environmental risks/hazards associated with their businesses and operations as well as for ongoing monitoring and review of risk controls, etc, so as to strive to make continuous improvements and to be more favourable towards an ethical and sustainable business.