



FIRST PACIFIC COMPANY LIMITED

第一太平有限公司

(Incorporated with limited liability under the laws of Bermuda)

Website: www.firstpacific.com

(HKEx: 142)

SUPPLIER CODE OF CONDUCT

PURPOSE AND SCOPE

First Pacific Company Limited (“First Pacific”) is committed to acting ethically and responsibly, in everything we do. To that end, we have developed our Supplier Code of Conduct (“Supplier Code”).

First Pacific bases its relationships with suppliers, contractors, consultants and advisers (collectively, “Suppliers”) on lawful, efficient and fair practices. Suppliers must adhere to the provisions of this Supplier Code, in connection with their activities for First Pacific.

Please contact the First Pacific representative you work with if you have any questions about this Supplier Code or the standards of business conduct that all Suppliers must meet in connection with their activities for First Pacific.

RESPONSIBILITIES OF SUPPLIERS

As a Supplier to First Pacific, you agree to:

- 1. Conduct business responsibly, with integrity, honesty and transparency, and to adhere to the principles of this Supplier Code.**
- 2. Maintain awareness of, and comply with, all applicable laws and regulations of the countries in which you operate.**
- 3. Compete fairly for First Pacific’s business, without paying bribes, kickbacks or giving anything of value to secure an improper advantage.**

First Pacific is committed to conducting business legally and ethically within the framework of a free enterprise system. Corrupt arrangements with customers, suppliers, government officials, or other third parties, are strictly prohibited. “Corruption” generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means.

- 4. Treat employees fairly, including with respect to wages, working hours and benefits.**
Suppliers are required to comply with all applicable legal and regulatory requirements relating to employees and other workers and to apply fair employee relations practices. Working hours, wages and benefits must be consistent with applicable laws and regulations and industry standards, including those pertaining to minimum wages, overtime, other elements of compensation and legally mandated benefits.
- 5. Provide a workplace free from discrimination, harassment and any other form of abuse.**
Suppliers should create a work environment in which employees and business partners feel valued and respected for their contributions. Harassment, including unwelcome verbal, visual, physical or other conduct of any kind that creates an intimidating, offensive or hostile work environment will not be tolerated. Employment decisions must be based on qualifications, skills, performance and experience.
- 6. Prohibit use of child labour.**
Suppliers must adhere to the minimum employment age limit defined by applicable law and comply with relevant International Labour Organization (ILO) standards. Suppliers must not permit children to perform work that exposes them to undue physical risks that can harm physical, mental or emotional development or improperly interfere with their schooling needs.
- 7. Prohibit all forms of forced or compulsory labour.**
Suppliers must maintain and promote fundamental human rights. Employment decisions should be based on free choice and there must be no coerced or prison labour and no use of physical punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse as a method of discipline or control.
- 8. Respect employees' rights to freedom of association and collective bargaining, consistent with local laws.**
Consistent with applicable law, Suppliers should respect employees' rights to join or refrain from joining associations and worker organizations.
- 9. Provide safe and healthy working conditions.**
Suppliers must comply with applicable health and safety laws and regulations and proactively manage health and safety risks with a view to providing an incident-free environment where occupational injuries and illnesses are prevented. Suppliers must implement management systems and controls that identify hazards, and assess and control risk related to their specific industry.
- 10. Carry out operations with care for the environment and comply with all applicable environmental laws and regulations.**
Suppliers must comply with applicable environmental laws and regulations. The potential environmental impact of Suppliers' actions should be considered along with opportunities for conservation of natural resources, recycling, source reduction and pollution control to ensure cleaner air and water and to reduce landfill wastes.

11. Deliver products and services meeting applicable quality and safety standards.

Suppliers are expected to:

- Know and comply with the quality standards applicable to the products and/or services delivered or provided by them.
- Report issues immediately to First Pacific that could negatively affect the quality of a product or service delivered or provided by First Pacific, or the public perception of any such product or service.

12. Controllership

Ensure that all invoices and any customs or similar documentation submitted to First Pacific or governmental authorities or audited by third parties in connection with transactions involving First Pacific accurately describe the goods and/or services delivered or provided and the price thereof and ensure that all documents, communications and accounting are accurate and honest.

QUESTIONS OR CONCERNS REGARDING THIS SUPPLIER CODE

Subject to local laws and any legal restrictions applicable to such reporting, each Supplier is expected to inform First Pacific promptly of any concerns related to this Supplier Code affecting First Pacific, whether or not the concern involves the Supplier, as soon as the Supplier has knowledge of such an occurrence. First Pacific policy forbids retaliation against any person reporting such a concern.

Suppliers agree to take such steps as First Pacific may reasonably request to assist First Pacific in the investigation of any such occurrence involving First Pacific and the Supplier.

A question or concern may be raised by a Supplier as follows:

- By discussing with a cognizant First Pacific Manager; OR
- By calling +852 2842 4388; OR
- By emailing esg@firstpacific.com.