

SUPPLIER CODE OF CONDUCT

1. Introduction and Purpose

- 1.1 At BRC Asia Limited, our ethos is grounded in doing what is right for both our business and society at large. With a vigilant Management and an unwavering commitment to sustainability, we aim to ensure the sustainable growth and development of the communities in which we operate.
- 1.2 To that end, our Supplier Code of Conduct sets out the minimum standards of conduct that BRC Asia Limited and its subsidiaries (generally referred to as "BRC") expect from our suppliers. We aim to collaborate with suppliers who share our commitment to being socially and environmentally responsible in our operations and fostering a transparent and ethical business environment. Our suppliers are crucial to the long-term success of our business, and the requirements and expectations set out in our Supplier Code of Conduct form the basis of our relationship with our suppliers.

2. Scope and Application

- 2.1 This Supplier Code of Conduct applies to, and must be complied with, by suppliers and contractors to BRC.
- 2.2 We will monitor the implementation of this Supplier Code of Conduct and the performance of our suppliers against its requirements. At appropriate intervals, we will review the applicability of this Supplier Code of Conduct and make revisions when deemed necessary. Changes will be communicated to suppliers.

3. General Requirements

- 3.1 This Supplier Code of Conduct serves to clearly communicate BRC's expectations when conducting business with our suppliers. Suppliers are to:
 - 3.1.1 Communicate this Supplier Code of Conduct to their employees and ensure their compliance;
 - 3.1.2 Cooperate in an honest and transparent manner with any requests for information or verification thereof with regards to BRC's Material Sustainability Matters (as defined under paragraph 4.1 below);
 - 3.1.3 Allow BRC to conduct, at any time during the tenure of the contract between BRC and the supplier, and with prior notification, inspections/audits at the supplier's premises;
 - 3.1.4 Create, keep a record of, and maintain documents to ensure and prove compliance and conformity where necessary;
 - 3.1.5 Conduct periodic self-evaluations, based on the template set out in the Annex to this Supplier Code of Conduct, to ensure conformity with the requirements set out in this Supplier Code of Conduct and share self-evaluations with BRC upon request; and

- 3.1.6 Report, as soon as practicable, any instances of non-compliance with this Supplier Code of Conduct to BRC at whistleblow@brc.com.sg. In accordance with the whistle-blowing policy, the Audit and Risk Management Committee has the authority to conduct independent investigations into any complaints and will ensure that the identity of the whistleblower is kept confidential and he/she is protected against detrimental or unfair treatment.
- 3.2 Failure to comply with any part of this Supplier Code of Conduct may result in cancellation of existing orders and the termination of BRC's business relationship with the supplier.

4. Material Sustainability Matters

- 4.1 BRC has determined the following sustainability matters as having a direct or indirect impact on BRC and BRC's ability to create value for the company, stakeholders, communities, or the environment and society writ large, and which BRC can also have an impact on:
 - a) Corporate Ethics
 - b) Health and Safety
 - c) Product Quality
 - d) Energy
 - e) Emissions
 - f) Material Efficiency

(collectively, the "**Material Sustainability Matters**").

- 4.2 The following sections set out BRC's minimum requirements on its suppliers with respect to such matters.

5. Corporate Ethics

BRC is dedicated to upholding the highest standards of integrity, transparency and honesty in all aspects of our operations. Suppliers are expected to adhere to the highest standard of moral and ethical conduct, to comply with local laws and regulations, and to comply with the minimum requirements below:

Anti-corruption and Conflict of Interest

- 5.1 Ensure that employees do not promise, offer, authorise, give, receive, or provide any unsanctioned or unauthorised payments, gifts, reimbursements or benefits-in-kind to/from parties that could affect their objectivity in their business decisions;
- 5.2 Comply with all applicable laws, regulations and trade agreements; and
- 5.3 Ensure that any actual or potential conflict of interest is disclosed to BRC.

Fair competition

- 5.4 Commit to upholding antitrust and competition law principles in Singapore and globally, such as fair conduct in competition;
- 5.5 Ensure that employees do not participate in anti-competitive activities, including agreements that prevent, restrict or distort competition, abuses of dominance and mergers that substantially lessen competition; and
- 5.6 Ensure that employees do not exchange or receive any competitively sensitive information which can infringe competition laws.
- 5.7 Please refer to the BRC Competition Law Compliance Policy for further guidance.

Private and Intellectual Property

- 5.8 Ensure compliance with all applicable privacy and data protection laws and make reasonable security arrangements at the supplier's own cost with regards to the access, collection, use, disclosure, copying, modification, disposal or destruction, retention, transfer, and/or processing of the personal data of BRC's customers and employees;
- 5.9 Maintain appropriate management of information systems to ensure the confidentiality, integrity and availability of information stored and processed;
- 5.10 Ensure that all intellectual property rights are respected;
- 5.11 Protect the intellectual property, trade secrets, and confidential information of BRC and its customers; and
- 5.12 Notify BRC immediately upon becoming aware of a breach of any of the supplier's obligations.

6. Health and Safety

Workplace health and safety

BRC places a high priority on the safety, health, and welfare of our employees and workers, and is dedicated to ensuring a secure workplace for our employees and workers. We also treat our employees fairly and with respect, and expect the same commitment to the physical, emotional, and financial wellbeing of workers from our suppliers. Suppliers are expected to comply with the minimum requirements below:

- 6.1 Comply with the applicable labour and employment, as well as health and safety laws;
- 6.2 Ensure that employees and workers have adequate and appropriate time, training and resources for their health, safety and wellbeing. This includes time and resources to attend BRC's safety training sessions and ensure that they are familiar with our safe-work procedures;
- 6.3 Establish and apply appropriate occupational health and safety management systems and operations;

- 6.4 Ensure that working environments are conducive, physically and psychologically safe and free from discrimination, harassment and retaliation;
- 6.5 Avoid or eliminate any form of forced or compulsory labour. Employees and workers should be allowed to end their employment voluntarily and without penalty and have terms of employment laid out in written contracts; and
- 6.6 Investigate all incidents to prevent future recurrences, and report, as soon as practicable, the findings to BRC.

7. Product Quality

To ensure structural safety, it is critical for BRC to maintain high quality standards in all our products and to ensure responsible marketing and advertising of our products by ensuring that our product information is clear, comprehensive and accurate. Our suppliers are expected to uphold these principles and comply with the minimum requirements below (where applicable):

- 7.1 Comply with applicable laws;
- 7.2 Comply with either the British Standard for Reinforcing Steel BS4449:2005 or Singapore Standard for Reinforcing Steel SS560:2016;
- 7.3 Comply with BRC's product and service information labelling standards;
- 7.4 Create, keep a record of, and maintain documents to ensure and prove compliance and conformity where necessary;
- 7.5 Conduct pre-testing of products before delivery; and
- 7.6 Notify BRC in advance if there are any factors which may affect product quality due to changes in equipment, materials and work methods.

8. Energy

BRC is committed to minimising our environmental footprint while delivering enduring value to stakeholders. We strive to minimise our environmental footprint by adopting energy-efficient technologies and exploring renewable energy sources. Close cooperation with our suppliers is crucial for managing our environmental footprint, and we expect our suppliers to comply with the minimum requirements below:

- 8.1 Comply with all applicable local environmental laws;
- 8.2 Cooperate with BRC to measure, track and report energy consumption and sources of energy;
- 8.3 Advocate responsible practices and undertake initiatives to promote greater environmental responsibility; and
- 8.4 Take reasonable efforts to improve energy performance and efficiency measures.

9. Emissions

BRC recognises the critical role emissions play in environmental impact, and we will implement comprehensive strategies to reduce and mitigate our carbon footprint with the overarching goal to reduce emissions intensity year on year. We expect our suppliers to comply with the minimum requirements below:

- 9.1 Provide upon request, where practicable, reporting data on environmental metrics such as emissions, energy consumption and water consumption.

10. Material Efficiency

Material efficiency is a fundamental aspect of our sustainability initiatives, emphasising the responsible use of resources and reduction of waste in our production processes. We aim to strike a balance between operational efficiency, environmental responsibility, and economic viability, reinforcing our dedication to sustainable business practices. We expect our suppliers to comply with the minimum requirements below:

- 10.1 Source raw materials with due consideration to responsible practices;
- 10.2 Provide upon request, where practicable, reporting data on sources of input materials, services and/or goods;
- 10.3 Provide upon request, where practicable, reporting data on waste generation, including the generation of scrap; and
- 10.4 Take reasonable efforts to reduce wastage during manufacturing.

11. Further information

For any questions about this Supplier Code of Conduct, please contact us at info@brc.com.sg.



ANNEX: Supplier Code of Conduct Self-evaluation Questionnaire

Self-evaluation questionnaire on compliance with BRC Supplier Code of Conduct

Name: _____ Company: _____
Designation: _____
Contact number: _____ Email: _____

All suppliers are to fill in this template on an annual basis. BRC may, from time to time, request that the completed self-evaluation questionnaire is submitted to BRC for review. Please note that further information and/or evidence of compliance may also be requested.

Please check the relevant boxes below and submit the completed form to BRC for review. All questions are to be answered.

PART I: GENERAL REQUIREMENTS

DECLARATION

- | | <u>YES</u> | <u>NO</u> |
|--|--------------------------|--------------------------|
| 1. BRC's Supplier Code of Conduct has been communicated to our employees. | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. We keep a record of, and maintain documents to ensure that we can prove our compliance with BRC's Supplier Code of Conduct. | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. We monitor our operations for compliance with BRC's Supplier Code of Conduct. | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. We will notify BRC as soon as practicable of any instances of non-compliance with BRC's Supplier Code of Conduct in our operations. | <input type="checkbox"/> | <input type="checkbox"/> |

PART II: MATERIAL SUSTAINABILITY MATTERS

QUESTION

- | | <u>YES</u> | <u>NO</u> |
|--|--------------------------|--------------------------|
| 5. We are not aware of any instances of non-compliance with BRC's minimum requirements for suppliers in relation to Corporate Ethics, as set out in BRC's Supplier Code of Conduct, within the past year. If no, please provide further details: _____ _____ | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. We are not aware of any instances of non-compliance with BRC's minimum requirements for suppliers in relation to Health and Safety, as set out in BRC's Supplier Code of Conduct, within the past year. If no, please provide further details: _____ _____ | <input type="checkbox"/> | <input type="checkbox"/> |

| | | |
|---|--------------------------|--------------------------|
| <p>7. We are not aware of any instances of non-compliance with BRC's minimum requirements for suppliers in relation to Product Quality, as set out in BRC's Supplier Code of Conduct, within the past year.</p> <p>If no, please provide further details:</p> <p>_____</p> <p>_____</p> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>8. We are not aware of any instances of non-compliance with environmental laws and regulations within the past year.</p> <p>If no, please provide further details:</p> <p>_____</p> <p>_____</p> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>9. We can provide, upon request and where practicable, reporting data on environmental metrics such as emissions, energy consumption and water consumption.</p> <p>If no, please provide further details:</p> <p>_____</p> <p>_____</p> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>10. We source raw materials with due consideration to responsible practices and take reasonable efforts to reduce wastage during manufacturing.</p> <p>If no, please provide further details:</p> <p>_____</p> <p>_____</p> | <input type="checkbox"/> | <input type="checkbox"/> |
| <p>11. We can provide, upon request and where practicable, reporting data on sources of input materials, services and/or goods, and on waste generation.</p> <p>If no, please provide further details:</p> <p>_____</p> <p>_____</p> | <input type="checkbox"/> | <input type="checkbox"/> |

The information provided in this self-evaluation questionnaire is true and correct.

Signed: _____

Date: _____

**Submit completed questionnaire (and any other relevant documents / information)
to BRC for review**