



SUPPLIER CODE OF CONDUCT

1. Objective

- 1.1 In line with Regal Hotels International (the “Group”)’s Sustainable Procurement Policy, the Group is committed to operating in an environmentally and socially responsible manner across all aspects of our business and in our supply chain to ensure that our need to purchase goods and services on competitive terms is not met at the expense of labour standards, health and safety, or the environment.
- 1.2 We favour suppliers who share the Group’s commitment to honesty and integrity, and integrate social, environmental, and sustainability policies into their business processes.
- 1.3 As a minimum, the Supplier Code of Conduct (the “Code”) outlined below should be followed by all of the Group’s suppliers. Subcontractors should be encouraged to adopt the Code as much as possible.

2. Application

- 2.1 This Code describes the minimum standards which the Group expects of their suppliers.
- 2.2 Suppliers are responsible for communicating the requirements of this Code to their employees and their own suppliers where necessary.

3. Scope

- 3.1 Legal and Regulatory Compliance:
 - (a) Suppliers must comply with all applicable laws and regulations wherever they operate.
- 3.2 Environment:
 - (a) Suppliers should have appropriate policies and systems in place to assess, measure and seek to reduce the environmental impacts of their operations.
 - (b) The Group will have a preference for suppliers whose goods and services can contribute to reducing our climate and environmental impact.

3.3 Modern Day Slavery:

- (a) We do not tolerate any form of modern slavery (including human trafficking, forced labour and child labour).

3.4 Child Labour:

- (a) Suppliers should not use child labour.
- (b) Suppliers must not employ any person:
 - i. In a manner which conflicts with the completion of their compulsory schooling;
 - ii. Below the age of 16 years on a full-time basis (unless part of a recognised professional apprenticeship programme), or below the legal age of employment in the countries in which they are employed (whichever is higher);
 - iii. Below the age of 18 years for employment at night (unless part of a recognised professional apprenticeship programme) or in hazardous conditions.

3.5 Forced Labour:

- (a) Suppliers should not employ any forced labour, including prison, indentured, bonded, military or slave labour.
- (b) Physical punishment, threats of violence or other forms of physical, sexual, psychological or verbal abuse as a means of enforcing discipline or control in the workplace should not be used.

3.6 Compensation and Working Hours:

- (a) Suppliers should pay at least the local legal minimum wage and are encouraged to follow applicable voluntary codes relating to compensation.
- (b) Employees should not be required to work for more than the number of hours permitted by law and should be appropriately compensated for overtime work. All statutory (including maternity and paternity) and contractual leave entitlements should be honoured.
- (c) Employees should be provided with written and understandable information about their conditions of employment, in respect to wages and working hours before they enter employment.
- (d) Suppliers must pay their employees promptly, providing each with clear, written accounting for every pay period. Wages should be paid regularly, on time and not



in more than one month in arrears. Deductions from wages as a disciplinary measure shall not be permitted.

3.7 Industrial Relations:

- (a) Suppliers should have in place communication mechanisms and grievance procedures that allow employees to raise concerns and complaints with management.

3.8 Health and Safety:

- (a) Suppliers should adopt and communicate health and safety policies and procedures that aim to reduce injury and illness and enhance employee health.

3.9 Discrimination, Bullying and Harassment:

- (a) Suppliers should not discriminate among their employees based on personal characteristics, including but not limited to age, gender, relationship, family status, disability, race, ethnicity, nationality, religious or political beliefs.
- (b) Suppliers should not tolerate any bullying or harassment (including sexual and racial harassment) of employees.

3.10 Bribery and Corruption:

- (a) Suppliers should not permit bribery and corruption. To this end, they should have in place policies covering the offer and receipt of advantages, payments to government officials, charitable contributions and sponsorships, entertainment and corporate hospitality, loans, agents and consultants, contractors and joint venture partners.
- (b) Suppliers should disclose to the Group any situation that may appear as a material conflict of interest. They are also expected to disclose to the Group if any of the Group's officials or professionals under contract with them have a material interest of any kind in the Supplier's business or any kind of economic ties with the Supplier.

3.11 Whistleblowing:

- (a) Suppliers may raise concerns about suspected or actual improprieties relating to the Group.
- (b) Third parties should make their report to whistleblowing@regal.com.hk.



The Group will review this Supplier Code of Conduct from time to time as appropriate, and in any event, once every three years.

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