

## FBD HOTELS SUPPLIER CODE OF CONDUCT

### INTRODUCTION:

FBD Hotels & Resorts is committed to conducting business in a manner that is ethical, responsible, and sustainable. We expect our suppliers to share this commitment and to adhere to the principles outlined in this Supplier Code of Conduct. This Code applies to FBD Hotels' suppliers, sub-suppliers, and other collaborative partners (referred to collectively as the “Supplier”), including their employees and temporary staff, regardless of whether they are employed on a permanent, temporary, or contractual basis (referred to collectively as “Employees”).

All Suppliers working with FBD Hotels, whether providing products or services, are required to meet the minimum standards outlined in this Code. FBD Hotels ensures that Suppliers incorporate these Code requirements into their agreements with sub-suppliers and temporary employees.

### Our approach is guided by four key pillars:

#### People | Culture | Environment | Governance

These are supported by a strong governance framework to ensure transparency, compliance, and long-term sustainability across our properties.

### PEOPLE:

We require all suppliers to treat their workforce with dignity, fairness, and respect, and to comply fully with employment legislation and recognised labour standards.

#### Human Rights and Fair Treatment

- Child labour must not be used under any circumstances. No individual may be employed below the legal school-leaving age or under 15 years of age, whichever is higher, except where permitted under recognised international conventions.
- Workers under 18 must not undertake hazardous work or duties that may affect their health, safety, or development.
- All employees must have the legal right to work in the relevant jurisdiction, and migrant workers must hold valid permits where required.
- Forced, bonded, trafficked, or involuntary labour is strictly prohibited. Employees must be free to leave employment subject to reasonable notice.
- Any form of abuse, harassment, coercion, or intimidation will not be tolerated.

#### Equality and Non-Discrimination

- Employment decisions must be based on merit and capability. Discrimination in hiring, pay, promotion, training, or termination is not acceptable on any grounds protected by law.

#### Wages and Working Hours

- Employees must receive fair pay and benefits in line with applicable wage legislation.

- Working hours must comply with national laws and industry norms.
- Overtime should be voluntary and compensated appropriately.

## **Health and Safety**

Suppliers are responsible for providing a workplace that protects the health, safety, and wellbeing of their employees and any third parties affected by their operations.

This includes:

- Compliance with all relevant health and safety legislation.
- Proper training, supervision, and access to protective equipment.
- Safe systems of work and risk management procedures.
- Facilities and practices that support employee wellbeing.

## **CULTURE AND ETHICAL BUSINESS CONDUCT:**

FBD Hotels & Resorts expects suppliers to conduct business with integrity and professionalism at all times.

### **Anti-Bribery and Corruption**

- Bribery, facilitation payments, or any improper inducement are strictly prohibited.
- Suppliers must not offer, promise, or provide any advantage intended to influence business decisions, whether to public officials or private individuals.

### **Conflicts of Interest**

- Any situation that could create a conflict between personal interests and business responsibilities must be declared promptly.

### **Accuracy and Transparency**

- Business records must be accurate, complete, and available for review where required.
- Suppliers must be able to demonstrate compliance with applicable standards and contractual obligations.

### **Confidentiality and Data Protection**

- Information received through engagement with FBD Hotels & Resorts must be safeguarded and used only for authorised purposes.
- This obligation continues even after the business relationship ends.

### **Product and Service Standards**

- Suppliers must deliver goods and services that meet agreed quality, safety, and regulatory requirements.
- Any risk relating to product safety or compliance must be reported without delay.

## **ENVIRONMENTAL RESPONSIBILITY:**

FBD Hotels & Resorts is committed to reducing environmental impact and supporting sustainable operations. Suppliers are expected to share this commitment.

Suppliers should:

- Operate in accordance with environmental laws and regulations.
- Use resources responsibly and seek to reduce waste, emissions, and energy consumption.
- Source materials responsibly, favouring traceable and sustainable supply where possible.
- Support environmentally sound practices throughout their own supply chains.

## **GOVERNANCE AND COMPLIANCE:**

Suppliers must comply with all applicable legal and regulatory requirements in the jurisdictions in which they operate.

They are expected to:

- Maintain systems that allow concerns about unethical or unlawful behaviour to be reported confidentially.
- Protect whistleblowers from retaliation.
- Cooperate with reasonable requests from FBD Hotels & Resorts to verify compliance, including audits or documentation reviews.
- Address any identified issues within an agreed timeframe.

## **Failure to Meet Standards**

Where a supplier is found to have contravened the requirements set out in this Code, and fails take the steps necessary, within an acceptable timeframe to correct the deficiency, FBD Hotels reserves the right to terminate any associated agreement or business relationship.

Termination as an FBD Hotel and Resorts supplier shall be effective from the time stated in a written termination notice from The Group Head of Development, Sustainability and Procurement.

## **Commitment to Responsible Partnership**

FBD Hotels & Resorts believes that strong supplier relationships are built on shared values and mutual accountability. By adhering to this Code, suppliers contribute to responsible business practices that benefit our guests, our communities, and the environment.