

Grain LNG

Supplier Code of Conduct

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Introduction

Grain LNG Limited and/or Thamesport Interchange Limited (together “**Grain LNG**”) determines how key actions are recorded, allocated, monitored and tracked at various levels within the business.

The Grain Terminal is classified as an upper tier site under the Control of Major Accident Hazards (COMAH) Regulations (2015) and as such the requirements of the Health & Safety Executive (HSE) and Environment Agency (EA) are fundamental in that they grant the business its license to operate. These authorities require that we operate legally with respect to accident prevention and environmental impact. Grain LNG reports to the HSE under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations ‘RIDDOR’ and the emissions from the terminal are reported to the Environment Agency under United Kingdom Emissions Trading System (UKETS).

National Gas Transmission receives gas from Grain LNG into the National Transmission System. The delivered material is required to meet the Gas Safety (Management) Regulations (GS(M)R) 1996 specifications.

GLNG requires suppliers to:

- comply with the requirements in this Code; and
- have appropriate systems in place to ensure continuous compliance and to demonstrate such compliance; and
- operate in compliance with all applicable laws and regulations from time to time in force, including laws and regulations relating to issues addressed in this Code.

Failure to comply with this Code may result in termination of the business relationship (including any contracts) and the award of any future contracts.

If there is a conflict between any applicable laws or regulations, the provisions of an agreement with Grain LNG and the provisions of this Code, suppliers shall meet the most stringent standard.

Updating this Code

GLNG may amend, update or replace this Policy from time to time in its sole discretion. The current version of the Policy will be made available on GLNG's website at www.grainlng.com, following the supplier link.

GLNG shall provide notice of any material changes to the Policy by posting the revised Policy on its website and, where practicable, by notifying the Supplier by email or other written communication. Unless otherwise stated, any revised Policy shall take effect 30 days after such notice is published.

The Supplier shall review GLNG's website periodically to ensure it is aware of the current version of the Policy. The Supplier may object to any revised Policy by providing written notice to the Company within 30 days following publication of the revised Policy. If the Supplier does not object within such 30-day period, or continues to supply goods and/or services to GLNG after the effective date of the revised Policy, the Supplier shall be deemed to have accepted the revised Policy and shall comply with it.

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Section one – People

Health and safety

In line with our key values, ensuring the health and safety of our employees, contractors and members of the public is one of our core values at Grain LNG. We strive to do the right thing and ultimately be a recognised leader in the development and operation of safe, reliable, and sustainable energy infrastructure that creates a purpose and belonging.

We believe that everyone in Grain LNG and everyone we contract with, collectively and individually, has a part to play to achieve this.

To work with Grain LNG, you must:

- understand your health and safety responsibilities;
- be committed to creating an environment that is safe, healthy, and secure for all your employees, and anyone who may be affected by your undertaking; and
- understand the safety of employees, contractors and members of the public is a mutual priority.

Wellbeing

Managing the wellbeing of our employees, contractors and supply chain is also one of our priorities. We know that where our people are engaged and healthy our work is more efficient, and our culture is more positive.

Following our approach, we encourage you to:

- focus on the physical aspects of health, understanding the impact this may have on the psychological aspects of health too;
- understand fatigue risk and stress risk;
- design workplaces and tasks around wellbeing needs; and
- ensure wellbeing is a priority for your workforce.

Respecting human rights and combatting modern slavery

Grain LNG expects all businesses in our supply chain to share our commitment to respecting, protecting, and promoting human rights. This includes alignment to the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact Ten Principles, the core labour standards of the International Labour Organisation (ILO), as a reference standard.

As a minimum, we expect:

- employment is freely chosen;
- freedom of association and collective bargaining, including the right of workers to decide whether to lawfully associate with groups of their choice, to form or join trade unions and to engage in collective bargaining, without interference by the supplier;
- safe and hygienic working conditions;
- no use of child labour;
- Living Wages (as defined by the Living Wage Foundation) are paid;
- no excessive working hours;
- no discrimination;
- regular employment;
- no harsh or inhumane treatment;
- no tolerance of harassment in the workplace, including sexual harassment. suppliers must take appropriate measures to prevent any form of harassment from occurring in the workplace, including as part of the services provided to Grain LNG, and provide evidence of any such measures to Grain LNG on request;
- a full understanding of your business operations and wider supply chain;

- that any potential human rights and modern slavery risks are assessed, managed and mitigated; and
- compliance with the requirements of relevant Modern Slavery Acts (e.g. The Modern Slavery Act 2015 for England and Wales) in your operating area(s).

If your business operates in the UK, we encourage you to publish an annual modern slavery statement on the [modern slavery statement registry](#) regardless of whether there is a legal obligation to do so.

The Real Living Wage

In the UK, Grain LNG has demonstrated its commitment to fair pay via accreditation with the [Living Wage Foundation](#). This commits both Grain LNG and contractors working on our behalf to pay, as a minimum, the real living wage as promoted by the Living Wage Foundation.

Therefore:

- the requirements of the Living Wage Foundation are mandated for all new UK contracts and embedded into our contract terms and conditions;
- the requirements apply to all contractors aged over 18 who work on behalf of Grain LNG for two or more hours a week for eight or more consecutive weeks;
- we ask suppliers with existing contracts for voluntary participation;
- we may require verification on request that the real living wage is being paid where contractually stipulated; and
- we expect our employment agency partners to uphold the same standards of employment that we offer our direct employees and adopt the “employer pays” principle. This means that no employee should ever have to pay to obtain access to temporary or permanent work within our organisation or supply chain.

Section Two – Customers and Communities

Community and workforce resilience

Our approach to responsibility in our communities goes beyond safely maintaining the resilient energy system society expects. It is also about making sure our economic and social role in the community has the greatest possible positive impact in supporting an affordable energy transition.

Additionally, Grain LNG is committed to skills development within our own business and that of our supply chain to meet the skills gap challenges recognised as an issue in our industry.

We recognise the role the supply chain can play in supporting this approach; therefore, Grain LNG encourages suppliers to:

- understand how their activities impact both the local area and wider community;
- make positive contributions and investments where appropriate, for example, by providing local employment opportunities, skills development and workforce volunteering;
- build positive relationships and minimise disruption to communities; and
- support our approach in developing the workforce of the future by focusing on formal training programmes targeted in areas considered to be in short supply. This includes the use of apprentices, graduate schemes, and other development/training programmes.

Resilience and business continuity

Grain LNG plays a role in developing, operating and maintaining critical national infrastructure. We rely on our suppliers to help us reliably provide for customers.

Therefore, Grain LNG expects all businesses in our supply chain to:

- have aligned resilience and business continuity arrangements with Crisis Management and Pandemic Plans in place. As a minimum, these should consider people, premises, process (information and technology), and providers; and
- review, test and exercise plans on a regular basis to ensure that you can continue to provide your services to Grain LNG in the event of any disruption to your operations.

More detail will be provided through the procurement process and contained within individual contracts where business continuity arrangements may be subject to review as part of the ongoing management of the contract.

Supplier diversity, equity, and inclusion

It is Grain LNG corporate policy and a responsible business commitment to promote diversity, equity and inclusion in our supply chain. We understand the value of an inclusive supply chain that is richly diverse with ethnic minority, women, LGBTQ, disabled, veteran and small and medium enterprises and other diverse businesses reflective of the communities we serve across the globe.

Therefore, we encourage you to follow our approach and:

- increase small diverse supplier participation in your own sourcing opportunities;
- identify subcontracting opportunities for small and diverse suppliers; and
- if requested, provide us with your diverse spend numbers via our third party spend tracking tool so Grain LNG can track Tier II Supplier Diversity Spend.

Section Three - Environment

We will enable a fair and affordable transition to a clean energy economy and reduce our own emissions.

Protecting the environment

At Grain LNG we are committed to being a responsible business, we recognise the value of the natural environment, and we ensure that environmental sustainability considerations are made in our ways of working, including in our investment, procurement, and operational decisions. We believe that we are all responsible for protecting the environment and our Responsible Business Charter 2023 (RBC) articulates what 'responsibility' means for us at Grain LNG.

Accordingly, we expect all our suppliers to support our RBC commitments and actively work towards making a positive impact on environmental factors, especially those linked to our operations.

As a minimum, we expect you to:

- ensure environmental considerations are included in your operations, activities, and documentation throughout the lifecycle of works with Grain LNG starting from sourcing activities to continued service;
- comply with all applicable legal and statutory requirements and obligations and have in place or work toward an environmental management system that is aligned to the requirements set out in recognised standards such as ISO14001;
- always act to prevent pollution which may result from your upstream and downstream activities;
- inform Grain LNG if you or any members of your value chain are operating in a water-scarce area and provide the relevant mitigation measures and evidence these are in place;
- utilise environmental impact assessment approaches or tools to ensure that any activities that may have a negative impact on natural habitats are conducted in a manner to protect biodiversity, limit deforestation and preserve land and marine resources;
- align your procurement programme and processes with best available practices in your industry, including recognised standards such as the ISO 20400 for sustainable procurement;
- assess ways to reduce the impact of climate change on your activities by implementing mitigation and/or adaptation measures; and
- deliver carbon neutral projects in alignment with PAS 2080 where applicable.

Setting targets

Our aim is to be a leading global utility, demonstrating technical and commercial solutions to help achieve net zero for the energy sector. Accordingly, we have set targets to reduce our own greenhouse gas emissions and continue to explore opportunities for setting more ambitious ones.

Therefore, we encourage all our suppliers to:

- establish a decarbonisation pathway in line with applicable guidelines to substantiate carbon reduction claims in your operations;
- implement an environmental strategy and establish relevant performance indicators and targets, including, but not limited to:
 - the reduction of Greenhouse Gas (GHG) emissions;
 - a systemic waste management process tailored to waste hierarchy, prioritising waste prevention and zero waste to landfill
 - tracking of energy usage, using renewable sources and increasing energy efficiency where possible;
 - ensuring resources are used efficiently, through good design, the procurement and use of sustainable materials, using less packaging, re-use, recovery, and recycling of

materials in a way that supports the circular economy methodology;

- seeking sustainable opportunities to enhance the natural value of the area for the benefit of communities and/or the environment;
- a water management process or assessment to identify and oversee water-related risks including current and future water stress;
- robust systems, processes, and other resources to furnish most up-to-date and verifiable environmental data and narrative that is reasonably free from any material misstatement, when requested by Grain LNG;
- training, skills, knowledge, and resources on good environmental sustainability practices to your staff working with Grain LNG; and
- where applicable, sign up to the Procurement Skills Accord (PSA) to support the creation of a sustainably skilled workforce in your sector.

Conflict minerals

Our policy is to avoid using products containing conflict minerals.

If you know, or have reason to believe, that conflict minerals may be contained within the product that you are supplying to us you must exercise due diligence to determine the source.

We expect you, as a business in our supply chain, to:

- have a policy and controls in place to monitor and prevent the use of minerals sourced illegally or unethically;
- document your due diligence efforts and make your measures available to us on request and provide us with evidence of the origin of the conflict minerals in products supplied by you to us;
- share your Environmental, Social and Governance (ESG) data through the Sustainable Supply Chain Alliance (SSCA) annually;
- report your waste volume, including your reuse and recyclability rate;
- provide energy efficiency strategies; and
- provide a certificate of provenance, sourcing, or any similar document to substantiate how your raw materials, product(s) or service(s) are sourced sustainably and ethically.

Section four – Responsible business fundamentals

Business ethics standards, fraud, bribery, and corruption

At Grain LNG, we have a zero-tolerance approach to any type of bribery, fraud, or corrupt business practices.

Therefore, we expect you to:

- have a programme in place to prevent bribery, fraud, or corrupt business practices;
- have procedures in place in accordance with all applicable local, state, federal or national laws or regulations. This includes without limitation, the UK Bribery Act 2010, UK Criminal Finances Act 2017 (Criminal Facilitation of Tax Evasion);
- have reporting channels in place so employees can raise concerns about inappropriate business practices or unethical behaviour;
- have processes in place to protect employees who raise concerns which includes protecting their identity; and
- escalate concerns relating to inappropriate business practices or unethical behaviour to us at the time you become aware so we can proactively work together to find a resolution.

Competition Law

Suppliers shall comply with all applicable competition laws (including but not limited to the Competition Act 1998), including without limitation those relating to teaming and information sharing with competitors, price fixing and rigging bids.

Contractual, Financial and Legal Integrity

Suppliers must promptly notify Grain LNG of any:

- actual, suspected, or potential issue that could impact their financial integrity;
- changes that affect their legal or contractual entity (such as mergers, acquisitions, or name changes);
- inability to meet their contractual obligations; and
- suppliers must comply with all filing requirements in their country of origin.

Entertainment, hospitality, gifts, and cash rewards

We require you to help enforce our rules on business rewards, such as gifts, meals, hospitality, and entertainment. Suppliers should maintain a gifts & hospitality register for all gifts & hospitality, over the value of UKP 50, received from suppliers who provide goods, works or services for our business.

Our employees may accept hospitality and entertainment as long as it is appropriate, has a genuine business purpose and is within the guidelines as set out in our Code of Ethics. The best way to avoid a potential conflict of interest is to avoid offering gifts, rewards, hospitality, or entertainment to our employees altogether and certainly not during a supplier selection process, to which you have been invited, to employees involved in that process.

We do not expect our employees to take part in any activity that would affect their judgement when dealing with you. We do not allow our staff to accept cash or cash equivalents, such as gift certificates.

Testimonials and endorsements

We may provide factual references on request for work that has been completed on our behalf.

Social media

Social media is now an integral part of our society. It enables us to convey messages and opinions to a wide audience instantaneously. The messages you convey become permanent public statements reflecting upon you, your business, your clients and customers.

If your social media activity is linked in any way – or could be deemed to be related to Grain LNG – by our customers, key stakeholders or others, the company has a legitimate interest in what is in the content being published, whether this is posted through a business or personal account.

Therefore, we expect you to:

- use social media in a responsible, reasonable, and respectful manner and ensure any comments you make align with the ethical values of Grain LNG. Do not post confidential Grain LNG proprietary information or business secrets. Discriminatory, harassing, offensive, bullying, abusive, threatening, false or misleading comments are unacceptable;
- not create new social media channels using Grain LNG's brand without permission from the Group Social Media Team;
- not share embargoed company announcements prior to the time and date specified;
- not discuss sensitive business-related topics, such as our performance, or anything else to jeopardise our trade secrets, confidential company information or intellectual property; and
- make it clear that any social posts you share about Grain LNG, or recommendations about working with certain people, are your personal opinions, made in a personal capacity and not on behalf of Grain LNG. You cannot refer to other Grain LNG colleagues by name without their express consent. Your recommendation must also not refer to any Grain LNG proprietary information or anything else that is confidential or involves our customers. Any breach of the above may result in action and could involve us requesting that you cease providing services to Grain LNG. Anyone suspected of committing a breach of this policy will be required to co-operate with our investigation.

Security

Grain LNG is committed to ensuring effective controls are in place to protect employees and company assets, including physical and intangible assets such as information.

Any significant compromise of personnel information, physical information, or IT security could result in disruption, with potentially serious economic, delivery, safety, and social consequences.

We expect all our supply chain partners to demonstrate a similar commitment to security and have, as a minimum:

- appropriate internal policies and procedures covering people (e.g. pre-employment checks), process and technology;
- security controls proportionate to risk, which support the policies and procedures;
- independent accreditation and assurance that security controls are in place;
- necessary controls in place to detect security anomalies; and
- plans defining the appropriate activities to perform and to respond to security incidents and events and recover from them.

In addition, any suppliers with access to Grain LNG data, equipment, people or information assets will also be required to review and understand Grain LNG's Security Policies and align with the requirements of (or be equivalent to) Grain LNG's IT Control Set. Copies such policies will be provided on request.

Operational security

To ensure our commitment to delivering operational excellence, including excellent levels of security,

we will be relying on the cooperation of suppliers.

If you have been identified as a supplier who supplies us with a product or service which supports a Grain LNG operational system, service, or asset, we expect you to:

- agree and implement enhanced organisational and technical policies, procedures, and controls where relevant; and
- work with us to provide any information requested by the pertinent authorities to ensure we are compliant with the relevant laws and regulations.

Data protection

Data protection and privacy laws regulate the collection, storage, use, disclosure, retention, and disposal of personal information, which can identify a living person.

We expect suppliers to:

- protect personal data fully in compliance with all relevant data protection legislation including but not limited to the Data Protection Act 2018 (which incorporates the General Data Protection Regulations);
- safeguard and not seek personal advantage from all confidential, proprietary, commercially sensitive and personal information that comes into your possession, only disclosing it to those authorised to receive it;
- have obtained the necessary legal consents or be able to demonstrate other lawful grounds for us to receive and process personal data for due diligence purposes to ensure suppliers meet our required standards. This may involve the collection of supplier personnel personal data, including, but not limited to, the results of any background checks, names, and email addresses;
- process any personal data shared with you by Grain LNG lawfully and in accordance with your contractual obligations;
- only collect the personal information required to fulfil the service you are providing and to not further process this information in a manner incompatible with this service;
- take steps to ensure personal information remains accurate and up to date;
- have a retention schedule to ensure personal information is not retained longer than is necessary;
- implement organisational and technical measures to ensure the integrity and confidentiality of personal information and provide independent accreditation and assurance over the controls related to the services (i.e. ISO 27001/SOC 1 and/or SOC 2, or equivalent standards);
- reasonably co-operate with and assist on data protection impact assessments or compliance matters which relate to the processing activities being carried out by you on behalf of Grain LNG; and
- report as a matter of urgency (and in any case within 24 hours) any unauthorised disclosure of personal data which you are processing on Grain LNG's behalf and to fully co-operate with any remediation efforts and subsequent investigation.

Use of Artificial Intelligence (AI)

In light of the significant legal and ethical issues involved in the use of AI:

- we require all of our suppliers to disclose if they are using an AI System* in the provision of goods or services to Grain LNG. This only applies to the direct provision of goods or services to Grain LNG – there is no obligation to disclose where you use an AI System in the internal management of your business;
- if you disclose that you are using an AI System in the direct provision of goods or services to Grain LNG, we will work with you to understand whether there are any legal or ethical considerations which will need to be addressed. We may need to ask you to refrain from using the AI System if we

are not satisfied that any legal and/or ethical risks can be appropriately managed; and

- if you are using an AI System and have failed to disclose the use of that system, this will be regarded as a serious breach of this Code and may result in you being in material breach of your contractual obligations towards Grain LNG. We would also reserve the right to inform the relevant statutory regulators of your failure to disclose.

** When we refer to an "AI System", we are referring to a system which operates with a certain level of autonomy, using machine learning and/or logic- and knowledge-based approaches, to produce system-generated outputs such as content (i.e. generative AI, predictions, recommendations and/ or decisions).*

Without limiting the above, suppliers shall implement and adhere to the highest standards of responsible and ethical practices when designing, implementing, monitoring, training, testing, deploying, or otherwise developing or using AI systems. This includes adhering to all applicable laws and regulations, industry requirements and standards, and guidance and codes of practice issued by a relevant regulatory authority.

In addition, suppliers shall: (a) ensure that any AI systems developed or used by the supplier are robust, secure, and safe throughout their entire lifecycle; (b) develop and use AI systems in a way that respects human rights and human-centric values, including fairness, equality, diversity, privacy and data protection, and avoiding discrimination and bias; (c) be transparent about when and how AI is used; (d) ensure the explainability, auditability and traceability of any AI systems used or developed by the supplier, including their outputs; (e) establish and maintain appropriate governance, risk management, policies and procedures that promote the responsible, accountable and ethical use of AI systems; and (f) where appropriate, ensure that decisions or outcomes from an AI system are contestable. Suppliers must be able to demonstrate to Grain LNG's satisfaction that it has embedded these requirements into its responsible AI practices.

Suppliers must not use or retain Grain LNG's data or confidential information for the purposes of training or inputting into any AI system or model without prior written approval of Grain LNG.

Where suppliers use third-party providers to develop an AI system, it must implement appropriate risk management and supervision measures to ensure that such third-party provider adheres to the standards set out in this section.

Tax compliance

Grain LNG expects its suppliers to ensure that they remain compliant with changes to tax law, and we will not work with suppliers who engage in any practices which may constitute tax evasion or involve workers not being taxed appropriately. For example, we expect you to have procedures in place to prevent the facilitation of tax evasion and to prevent other offences as set out in the Criminal Finances Act 2017.

We would also like to remind you of the importance of the changes to the off payroll working rules (IR35) that became effective from April 2021:

- we expect individuals involved in providing services to Grain LNG to be paid subject to deduction of PAYE tax;
- it is only permitted for individuals to provide their services via a personal service company (PSC), Sole Trader or other type of intermediary within our supply chain in exceptional circumstances;
- if, in exceptional circumstances, you are providing services to Grain LNG which include a supply of labour through an intermediary (such as a PSC or Sole Trader), you must inform your Grain LNG Hiring Manager before services commence, so that compliance checks can be undertaken;
- if you are in any doubt as to whether a staffing arrangement you are using is affected by the off payroll working rules you should discuss this with your Grain LNG Hiring Manager. Failure to do so could place your organisation and Grain LNG at risk of being in breach of tax law; and
- Grain LNG reserves the right to require the immediate removal of any individuals found to be

providing services via a PSC without approval within the supply chain.

The Prompt Payment Code

Grain LNG has demonstrated its commitment to the fair treatment of our suppliers by signing up to the Prompt Payment Code. We encourage our suppliers to adopt the principles of this Code throughout their own supply chains.

National Security and Investment Act

Grain LNG is responsible for critical UK national infrastructure; therefore, we expect all suppliers to:

- familiarise themselves with the legal regime under the National Security and Investment Act 2021 (NSIA);
- notify us immediately if they believe that they may be subject to a “qualifying acquisition” under the NSIA; and
- on an ongoing basis, assess and manage all other risks which the NSIA may give rise to.

The NSIA applies throughout the life cycle of a transaction from pre-tender, and throughout the entirety of project delivery. It also applies retrospectively to transactions already entered.

We reserve the right to raise clarification questions of suppliers in this regard at any time, and Grain LNG will make mandatory notifications under NSIA where required to do so by law. Grain LNG may also choose to make voluntary notifications under NSIA where it has concerns, in respect of a particular contract, which are relevant in the context of the NSIA.

Please note that in circumstances where the NSIA applies, the UK Government may issue an order which would have the effect of preventing Grain LNG from being able to continue to engage with you. This may result in termination of your contract with Grain LNG.

International trade / sanctions compliance

Grain LNG has a zero-tolerance approach to breaches of sanctions legislation.

Suppliers and their affiliates must:

- comply with all applicable local, state, federal or national laws, rules or regulations relating to international trade controls and sanctions that apply to its operations and that apply to Grain LNG, its affiliates and subsidiaries;
- have a programme in place to prevent, detect and respond to activities that may cause or contribute to a violation; and
- Should you identify a breach or potential breach of such above-noted laws, rules or regulations, notify Grain LNG immediately.

Subcontracting and supply chain

Where allowed under the terms of the contract with Grain LNG to subcontract work or services to third parties, we require the following:

- prior written approval for each new contractor, to include transparent support locations; and
- agreement that you are responsible for all acts of any subcontractor or third parties.

To support this, you should be able and willing to provide evidence on request. Evidence could include but is not limited to:

- documentation showing subcontractors and third parties are informed, agree and adhere to the provisions of this Supplier Code of Conduct and relevant agreements; and
- risk assessments with proper due diligence performed including background checks, time and expense records, and certificates of insurance.

Section five – Compliance with the supplier code of conduct

We strongly believe in openness and transparency and encourage our employees and those working on our behalf to raise any concerns.

If you believe that an employee, contractor, or anybody else doing business with us has acted unethically or unlawfully, you must quickly bring this to our attention using the confidential helpline available below.

In return, we will investigate the facts thoroughly, fairly and promptly when you raise a concern. This will be undertaken in the strictest confidence, and we will not tolerate any form of retaliation or victimisation where a concern is raised in good faith.

The supplier shall not retaliate or take disciplinary action against any worker that has, in good faith, reported breaches of this Code or questionable behaviour, or who has sought advice regarding this Code.

Furthermore, Grain LNG requires you to:

- evaluate your activities to make sure you are keeping to this Supplier Code of Conduct and adhering to its provisions throughout your work;
- be able to demonstrate compliance to the principles set out in this document whilst working on behalf of Grain LNG;
- if requested by Grain LNG, furnish information in a clear, consistent, transparent, and verifiable manner;
- have a process in place to remedy any instances of non-compliance, breaches or problems identified through audits, reviews, investigations or inspections;
- bring to our attention immediately any significant issue, non-compliance or potential breach of legislation or regulation;
- investigate and report any concerns or complaints you have about issues to do with breaking the law or standards which relate to our business, sub-suppliers or sub-contractors. We can then investigate and deal with these issues;
- fully co-operate with us during any investigation we carry out and not retaliate against any person or business who raises concerns; and
- have suitable training in place for key personnel working with Grain LNG, introducing this Supplier Code of Conduct and its provisions along with your relevant policies and procedures.

We may request a letter of assurance certifying that you have complied or have brought issues to Grain LNG's attention in a timely manner. Any violations of Grain LNG's Policies will be investigated.

Further, we may conduct an audit or site visit to ascertain the effectiveness of any area of this Code.

Failure to comply with this Code may result in termination of the business relationship (including any contracts) and the award of any future contracts.

Where Grain LNG becomes aware of a material breach of this Code by the supplier or its workers, Grain LNG may either: (a) immediately terminate its business relationship with the supplier (including any contracts); or (b) require the supplier to produce a remediation plan specifying the actions that the supplier will take that will lead to compliance with this Code, and present it to Grain LNG within 30 days of being requested to do so.

If the supplier fails to produce the remediation plan within this timeframe or fails to implement it within a reasonable time, Grain LNG may immediately terminate its business relationship with the supplier (including any contracts). Grain LNG may also suspend the business relationship with the supplier while remediation is ongoing.

Where Grain LNG becomes aware that a supplier's suppliers, agents, and subcontractors who form part of Grain LNG's supply chain (each a Representative) has been involved in an incident (or incidents) that would constitute a breach of any of the requirements under this Code, were they bound directly by it, Grain LNG may either: (a) terminate its business relationship with the supplier (including any contracts); or (b) require the supplier to remedy that incident (or incidents) with that Representative. If the supplier is not able to remedy such incident with that Representative within a reasonable time, Grain LNG may immediately terminate its business relationship with the supplier (including any contracts).

If you have any questions relating to the content of the Supplier Code of Conduct, you should contact your Contract Manager where relevant. If you want to raise a concern or breach, please contact Grain LNG's Team Procurement Team.

Helpline (provided by Navex)

By Mobile Device: grainlngmobile.ethicspoint.com

Report online at: grainlng.ethicspoint.com

Call toll-free: 0808 168 4516 (24 hours a day, 7 days a week; anytime, from any location)

