

SUPPLIER CODE OF CONDUCT

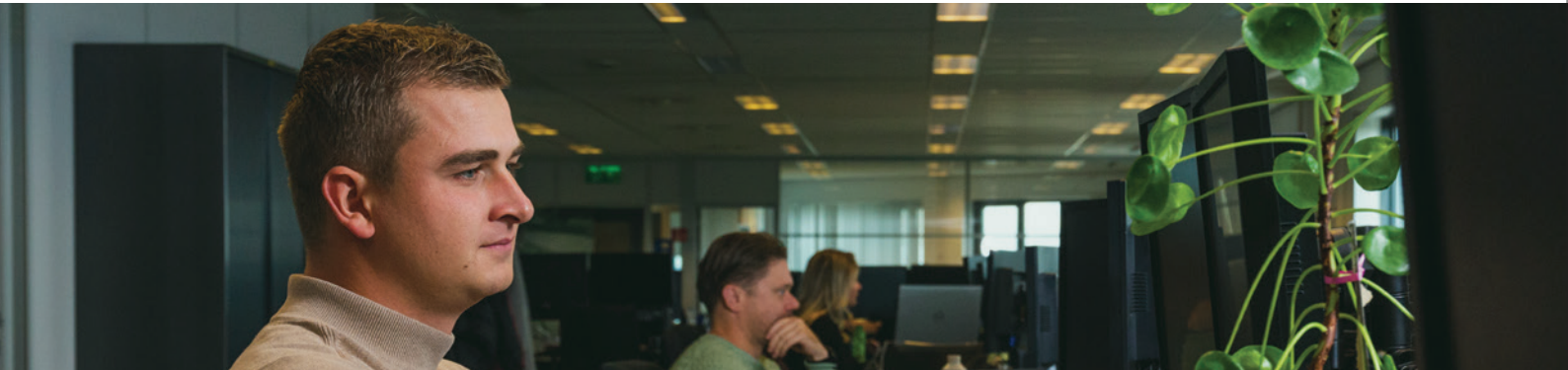


NewPort

We never stop



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A message from our CEO

Dear suppliers,

At NewPort, we believe that every partnership is built on trust, respect, and a shared commitment to doing what is right. Our suppliers are not just vendors, they are essential partners in our exploration toward a sustainable, ethical, and successful future.

As a global logistics partner in the chemical and food sectors, we recognize the responsibility that comes with every shipment. It is not only cargo we move, but also the trust of our customers, the safety of our communities, and the well-being of future generations.

This Code of Conduct is more than a formality. It reflects who we are and the standards we hold ourselves and our partners to: transparency, integrity, and the discipline to do what is right, even when no one is watching.

To our suppliers: you are an extension of our promise. We count on you to uphold the same high standards we set for ourselves. Together, we can deliver more than logistics, we can deliver positive impact.

We keep moving forward: responsibly, transparently, and in partnership with you, because

we never stop



Jason Huo
Chief Executive Officer
NewPort Tank Containers

Introduction



At NewPort, we recognize our responsibility to operate with integrity, sustainability, and respect for people and the environment across all areas of our business. We are committed to minimizing negative impacts and making positive contributions throughout our value chain.

This Supplier Code of Conduct outlines the essential expectations we place on our suppliers and their subcontractors. It serves as a foundation for ethical and lawful business conduct, aligned with internationally recognized standards and applicable legal requirements.

Our approach is grounded in the principles of the UN Global Compact, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the management system framework of ISO 9001:2015, CDI IMPCAS and we also align with sustainability assessment frameworks such as EcoVadis.

Where local laws are less stringent than the principles outlined in this Code, we expect suppliers to apply the higher standard. In cases of conflict between legal obligations and this Code, suppliers are encouraged to engage with NewPort to determine a responsible and practical path forward.

To support implementation, we provide guidance and resources to help suppliers meet these expectations and continuously improve their practices.

In our world, there is no 'just another day at the office'.
Because in our world, that day simply never ends.
We cut through time zones, we break through borders, and we overcome what's in our way. We push our own limits and society forward, to make that difference between loss or profit and failure or success. Always exploring new opportunities and being committed to our customers.



In our world,
we never stop!

Implementation, compliance And continuous improvement

This Code applies to all NewPort suppliers, including subcontractors, agents, consultants, and affiliated entities that provide goods and/or services to NewPort.

Suppliers are expected to acknowledge and uphold the principles outlined in this Code. Compliance will be evaluated through a combination of documentation reviews, self-assessments, and audits conducted as part of NewPort's company policy. Where gaps are identified, suppliers must develop and implement a time-bound improvement plan in collaboration with NewPort. Follow-up reviews may be conducted to verify progress and ensure alignment with our expectations.

Suppliers are expected to implement management systems appropriate to their size and industry to ensure compliance with our Code of conduct. This includes cascading these standards to their own suppliers and potential subcontractors.

Suppliers are also expected to extend the principles of this Code throughout their own supply chains. This includes communicating expectations to subcontractors and partners, and taking reasonable steps to ensure alignment with NewPort's standards.

Our goal is to build long-term, responsible partnerships. We are committed to supporting suppliers on their journey toward improved sustainability and ethical performance, grounded in mutual respect and open dialogue.

Chapter 1:

The beginning of our partnership

to embrace these values, not just in words, but in every action and decision.

In the world of business, the law is our compass. We expect our suppliers comply with all applicable laws and industry rules relevant to their contracted activities, including but not restricted to Dangerous Goods (DG) regulations and national HSE/environmental legislation.

A documented compliance/HSE management system must be maintained, and operations should reflect the latest IMDG Code, ADR, ITCO Guidelines, and equivalent standards. Suppliers must maintain accurate records, cooperate with audits, and report performance metrics.



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Human Rights



Chapter 2:

Protecting What Matters

Suppliers are expected to uphold human rights and decent work principles. Suppliers shall respect internationally proclaimed human rights and uphold decent work principles.

Core Principles: Labour & Human Rights Due Diligence

- Prohibit forced, bonded, or trafficked labour; do not retain identity documents; and allow workers to terminate employment freely with reasonable notice.
- Prohibit child labour and verify minimum age; provide enhanced protections for young workers.
- Provide fair working hours, wages, and benefits in line with law and collective agreements; provide written contracts in a language workers understand.
- Ensure non-discrimination and equal opportunity; prevent harassment and abuse.
- Respect freedom of association and the right to collective bargaining (where lawful).
- Progressively implement risk-based human-rights due diligence across operations and the supply chain, including identifying salient risks, mitigation actions, and access to remedy.*

2.1 Occupational Health & Well-being

Beyond physical safety, we require our suppliers safeguard the overall health and well-being of their workforce.

Core Principles: Worker Health & Mental Well-being

- Implement programs addressing ergonomic risks, fatigue management, and mental health support.
- Provide access to occupational health services and wellness initiatives.
- Encourage work-life balance and stress management practices.
- Monitor and mitigate psychosocial risks in the workplace.



2.2 Speaking Up

Suppliers are expected to implement grievance mechanisms that allow anonymous reporting without fear of retaliation. All grievances must be investigated fairly and timely.

We also welcome concerns from anyone within or outside of NewPort if they suspect or know of any potential or actual violations of this Code. We do not tolerate retaliation against anyone making reports in good faith.

Core principles: Speak-Up & Non-Retaliation (Grievance Mechanism)

- Implement confidential whistleblowing channels with non-retaliation protections and timely case handling.
- Provide accessible, confidential reporting channels for workers and stakeholders; allow anonymous reporting where lawful.
- Prohibit retaliation and protect reporters and those assisting investigations.
- Where the Supplier caused or contributed to adverse impacts, cooperate to provide or enable effective remedy.

2.3 Growing Together

NewPort values the growth and development of its people, and are proud about our continuous learning culture. We expect our suppliers to provide similar opportunities for training and development. Together we can become truly unstoppable.

Core Principles: Training & Development

- **Training & Competency Development:** Suppliers should make sure that all employees receive role-appropriate training, including health, safety, and well-being topics. Training should be documented and refreshed regularly. Suppliers are encouraged to track and improve learning outcomes
- **Continuous Learning Culture:** Promote a culture of continuous improvement and learning. Suppliers should invest in employee development programs that enhance skills, support career growth, and create resilience in the workforce.
- **Inclusive Access to Training:** Ensure that training and development opportunities are accessible to all workers, regardless of role, location, or employment status. Special attention should be given to vulnerable groups and those in high-risk roles.
- **Alignment with NewPort Standards:** Suppliers are encouraged to align their training and development efforts with NewPort’s expectations and frameworks, including ISO 9001:2015 and EcoVadis sustainability criteria.



2.4 Ethics & Integrity

Suppliers must operate with the highest standards of integrity and transparency. This includes a zero-tolerance approach to bribery, corruption, extortion, and embezzlement.

Core Principles: Anti-Bribery & Conflict of Interest

- Prohibit all forms of bribery and corruption, including facilitation payments and kickbacks.
- Avoid conflicts of interest that may compromise business judgment or objectivity.
- Implement internal controls and training to prevent unethical conduct



Human Rights



Chapter 3:

Safety, Security & Operational Excellence

Safety is a shared promise. Suppliers are required to demonstrate safety leadership, provide role-based DG training, and implement safe systems of work for critical tasks. Adherence to industry standards and excellence in quality is required.



Core Principles: Safety & Dangerous Goods (DG) Compliance

- **Health & Safety:** comply with applicable health and safety laws. Implement effective HSE management systems, empower workers to report unsafe behaviour and maintain emergency response procedures. Maintain and drill emergency response plans; notify NewPort Tank of notifiable events promptly.
- **HCDG Security & training:** Implement robust security measures for High Consequence Dangerous Goods (HCDG), including access control, secure storage, and transport monitoring. Conduct risk assessments and apply mitigation strategies aligned with applicable regulations and industry best practices. Ensure personnel handling HCDG are trained in security awareness and emergency response protocols.
- **DG and Task Training:** Provide role-based DG and task training (IMDG/ADR as applicable), with competency verification and refresher cycles.
- **Standards:** Baseline Operations must reflect the latest editions of: IMDG Code , ADR 2025 , applicable ITCO Technical Guidelines, and other industry assessments such as SQAS & CDI IMPCAS for chemical logistics. While this is the baseline, our supplier may also propose alternative standards that comply with our shared desire for safe chemical distribution.
- **Critical Tasks:** if relevant; Implement written safe systems of work for: working at height on tank tops (last resort), safe tank entry, sampling, heating/steam, handling polymerizing substances, and pressure-relief device (PRD) checks—aligned with ITCO guidance. Permits to work are essential and required.
- **Incident Management:** Report DG incidents, near-misses, and injuries immediately; conduct root-cause analysis and share lessons learned.
- **Equipment Integrity:** Maintain tank containers and fittings per design, test, and inspection requirements ; apply recognized acceptable container condition (ACC) criteria for release/acceptance.



3.1 Physical & Supply Chain Security

Suppliers are expected to ensure robust physical security measures to protect goods, facilities, and personnel throughout the supply chain.

Core Principles: Cargo & Facility Security

- Implement security controls aligned with C-TPAT, CDI IMPCAS or equivalent approved standards to prevent unauthorized access, theft, and tampering of goods in transit and storage.
- Conduct background checks for personnel in sensitive roles.
- Maintain incident response plans for security breaches

3.2 Data Security & Privacy Protection

Confidentiality and data protection are non-negotiable. Suppliers will need to safeguard personal and operational data, secure technology interfaces, and notify NewPort of any data or cyber incidents without delay.

Core Principles: Privacy, Cyber Security & Flow-Down

- **Data Protection:** Protect personal data in accordance with applicable data-protection laws (e.g., GDPR) for the country the supplier operates in.
- **Cyber Security:** Secure operational technology and technology interfaces (asset trackers, sensors, gate systems); maintain access control, patching, and encryption in transit where feasible.
- **Incident Notification:** Notify NewPort Tank without undue delay of data or cyber incidents affecting our data, systems, or operations.
- **Risk-Based Monitoring:** Identify higher-risk tiers (e.g., short-term labour providers, depots in high-risk geographies) and perform proportionate checks.



3.3 Digitalization & AI Ethics

Suppliers should ensure responsible and ethical use of digital technologies, including artificial intelligence.

Core Principles: Data Ethics & Transparency

- Use AI and digital tools in a transparent, fair, and accountable manner.
- Avoid bias and discrimination in algorithmic decision-making.
- Protect data privacy and comply with applicable AI governance frameworks.
- Regularly review and audit digital systems for ethical compliance.

3.4 Intellectual Property & Financial Integrity

Suppliers are required to respect intellectual property rights and ensure financial transparency in all transactions.

Core Principles: IP Protection & Anti-Money Laundering

- Safeguard confidential information and proprietary technologies.
- Maintain accurate financial records and prohibit money laundering activities.
- Comply with applicable financial reporting and anti-fraud regulations.

3.5 Fair Competition

Suppliers shall comply with anti-trust laws and promote fair competition in all markets.

Core Principles: Competition & Market Ethics

- Avoid anti-competitive practices such as price fixing, bid rigging, or market allocation.
- Promote open and fair business practices aligned with legal and ethical standards.

3.6 Alcohol & Drug Policy

Suppliers are expected to maintain a workplace free from the influence of alcohol and drugs.

Core Principles: Substance Abuse Prevention

- Implement policies that prohibit the use of alcohol and illegal substances during work hours.
- Provide support programs for substance abuse prevention and rehabilitation.



We are
Committed

Our curiosity and innovativeness goes beyond our daily tasks. We have a strong urge to explore new markets, as well as new, distinctive ways of working.

We are
Exploring

We are committed to everything we do, and above all, to our customers. We deliver a wide variety of services, we shift up a gear when necessary, and we have the skills and knowledge within our teams to do so.

We are
Unstoppable

In our world, the day never ends. We cut through time zones, we break through borders, and we overcome what's in our way. We simply never stop!



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Climate action

Chapter 4:

Caring for Our Planet

We recognize our shared responsibility to protect the environment and combat climate change and we expect our suppliers to operate in a manner that supports environmental sustainability, complies with all applicable laws, and contributes to a low-carbon, circular economy. Together, we can reduce our collective environmental footprint and build a more resilient future.



Core Principles: Pollution Prevention, Climate action & Data transparency

- **Permits & Controls:** Operate under valid environmental permits for waste, wastewater, and air emissions and equivalent legislation; maintain secondary containment and loading controls to prevent spills.
- **Waste Management:** We expect our suppliers to manage residues, wash water, and slops responsibly through licensed contractors.
- **Resource Efficiency:** Efficient use of natural resources (water, energy, raw materials) and proactive management of water/effluent discharge, especially in water-stressed regions.
- **GHG & Energy Data Sharing:** Suppliers shall provide activity-based data for contracted services on request, such as distances, fuel/energy use, and equipment type, to support customer and statutory reporting (e.g., CSRD/ESRS).
- **Emission Reduction targets:** Suppliers are encouraged to set and pursue science-based greenhouse gas (GHG) reduction targets, preferably aligned with the Science Based Targets initiative (SBTi).
- **Climate Risk & Resilience:** Suppliers should identify and manage climate-related risks, including physical risks (e.g., extreme weather) and transitional risks (e.g., regulatory changes). Business continuity plans should reflect climate resilience considerations.
- **Sustainable logistics:** Suppliers are encouraged to optimize logistics and adopt low-emission transport modes (e.g., electric vehicles, rail, biofuels). Efforts to reduce empty runs and fuel consumption are expected.
- **Environmental Training & Awareness:** Suppliers should provide regular environmental training to employees to ensure awareness of environmental responsibilities and compliance with relevant policies.
- **Sharing knowledge:** While we remain committed to advancing our sustainability goals, we actively encourage our suppliers to share innovative practices and insights that contribute to a more sustainable future. Collaboration on pilot projects, joint initiatives and best practice exchanges is welcome.



4.1 Product Quality & Safety

Suppliers are responsible for ensuring that their products and services meet all required safety and security standards.

Core Principles: Product Compliance & Labeling

- Comply with relevant regulations for product safety, labeling, and traceability.
- Implement quality control systems and continuous improvement practices.



Accountability



Chapter 5:

Accountability, Monitoring & Consequences

Suppliers are responsible for meeting NewPort Tank’s performance expectations and for driving continuous improvement according to the agreed standards.

More about this can be found in the *NewPort Supplier Agreement*

Performance Management (KPIs & Thresholds)

- NewPort Tank will monitor performance using agreed indicators. Suppliers should track, review, and, where requested, report these KPIs* to NewPort.
- Failure to meet established thresholds may result in corrective actions, performance reviews, or contractual consequences, depending on the severity and frequency of *non-compliance*.

* Agreements on KPIs can be confirmed in a countersigned service level agreement (SLA) between NewPort and supplier.



Monitoring & Consequences

- **Supplier evaluation:** NewPort Tank may conduct document reviews, remote or on-site audits, request self or desk audits and require performance reviews.
- **Suppliers shall provide:** access to relevant sites, records, and personnel, including subcontractors.
- **Incident Management:** NewPort Tank may require containment and corrective and preventive actions (CAPA) with agreed timelines
- **Incident Notification:** Serious incidents must be notified immediately (within 24 hours latest). These incidents include, but are not limited to: fatality, significant spill, major DG breach, government prohibition notice, data breaches.
- **Negligence:** Breach-related costs and losses caused by Supplier non-compliance may be recoverable subject to contract.



6 Commitment

Chapter 6:

The Commitment

By partnering with NewPort, suppliers commit to upholding our principles and supporting responsible business practices. Our goal is to strengthen collaboration, partnership, and shared success.

In cases where gaps or deviations are identified, we will work together to implement corrective action(s) and drive continuous improvement. Termination is considered only as a last resort when compliance cannot be achieved.

We regularly review and update our Code of Conduct to reflect evolving best practices, regulatory developments, and our commitment to sustainability and ethical standards.

Should any updates occur, we will formally request your acknowledgment to confirm continued alignment with these principles.

Key References & Standards

UN Global Compact: <https://www.unglobalcompact.org/>

Universal Declaration of Human Rights: <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

IMDG Code: <https://www.imo.org/en/OurWork/Safety/Pages/DangerousGoodsDefault.aspx>

ADR 2025: <https://unece.org/transportdangerous-goods/adr-2025>

ITCO Guidelines: <https://www.itco.org/>

EcoVadis: <https://ecovadis.com/>

CDI IMPCAS: <https://www.cdi.org.uk/>

EU Corporate Sustainability Due Diligence Directive (CSDDD): <https://ec.europa.eu/>

Science-Based Targets initiative (SBTi): <https://sciencebasedtargets.org/>

EU AI Act: <https://artificialintelligenceart.eu/>

GDPR: <https://gdpr.eu/>

UN Sustainable Development Goals: <https://sdgs.un.org/goals>

ISO 9001:2025

CTPAT





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