



APPENDIX II: APM TERMINALS THIRD PARTY COMPLIANCE CODE



APM Terminals (“APMT”) is committed to observing the highest standards of honesty and integrity in how it does business. We demand our business partners to abide by these ethical standards in connection with any activities undertaken in relation to APMT.

Anti-Bribery and Corruption

Bribery is a criminal offence in every country where APMT operates and is against APMT’s fundamental values and business principles. Because the APMT Group face potential legal risks due to actions of our business partners, our business partners should act in accordance with all applicable anti-bribery laws.

ANTI-CORRUPTION STANDARDS

Our business partners shall:

- not take any action that could damage APMT’s reputation for ethical business practices;
- co-operate fully with APMT’s anti-bribery and corruption due diligence enquiries. All responses to such enquiries must be true, accurate and complete;
- comply with all applicable anti-corruption laws and regulations;
- not offer, give, or agree to give any improper financial or other advantage, whether indirectly or indirectly, to any person (including public officials and employees of commercial organisations) for the benefit of APMT; and
- not, without the prior written approval of APMT:
 - pay any sums in respect of permits, licenses, fines or other fees to any public official or government agency; or
 - make any donations to any charity, political party, political party official, or candidate for office.

Foreign Trade Controls:

APMT is committed to obey foreign trade controls by not conducting business with listed entities and persons and exporting dual-use items (goods, software and technology) without appropriate license.

APMT’s business partners should also comply with all applicable foreign trade controls, including:

- sanctions imposed against entities and persons by the European Union and/or any of its Member States (“EU”), and the United States (“U.S.”); and

- requirements for export and re-export licenses for controlled goods, software and technology.

Our business partners shall not:

- export or re-export controlled items or technical information without the necessary license under applicable laws;
- export or re-export items or technical information to embargoed or otherwise restricted countries, end-users, or end-uses; and
- export or re-export items or technical information for prohibited nuclear, missile, or chemical biological weaponry end uses.

Without APMT’s prior written consent, our business partners shall not deal with any party that:

- is listed on any sanctions list applicable in any of the jurisdictions where APMT operates, e.g., the U.S. or the EU; and
- is controlled by, or acts on behalf of, any such listed or sanctioned party.

Competition/Antitrust Law

APMT is committed to observing all competition laws affecting its operations. Since the actions taken by APMT’s business partners might have an impact on both APMT’s reputation and its legal exposure, APMT’s business partners should abide by these laws when performing activities that are connected to APMT.

In particular, our business partners shall not:

- impose on APMT an obligation to purchase all or practically all of its requirements from them;
- impose on APMT an obligation to acquire products or services by tying them to the products or services required by APMT;
- use APMT to channel commercially sensitive information to its competitors;
- exchange commercially sensitive information with a JV jointly controlled by it and APMT; and
- engage in any practice or participate in any agreement or understanding that is prohibited by any competition or anti-trust law applicable to it.

Finally, any suspected violation of these standards should be reported to APMT as soon as practicable by contacting the APMT Legal Department legaldepartment@apmterminals.com or www.apmterminals.com > **contact us.**