



Third Party Code of Conduct

This document sets out the key standards of conduct we commit to offering to third parties and those we expect existing / prospective third parties to meet.



Message from Nakilat's Chief Executive Officer

Dear Partner,

Nakilat, as a global leader and provider of choice for energy transportation and maritime services, is fully committed to conduct business in a responsible, ethical, and transparent manner, as prescribed within our Code of Business Ethics and Conduct ("Code of Ethics").

Nakilat's Code of Ethics does not only contribute to our mission statement or reflect on our core values, but it also defines the way we do business with our partners. Our Code of Ethics outlines our expectations for ethical behavior and how we must act to build a strong collaborative culture of integrity and trust. It is also an essential for us to achieve our business goals and ensure continued growth and prosperity to our organization, community, and society.

Moreover, "Responsible Procurement" has been identified as an important topic within Nakilat's Environmental, Social and Corporate Governance (ESG) strategic framework. Therefore, the enclosed Nakilat's Third-Party Code of Conduct, not only outlines the conduct expected of our business partners but also defines the approach to ESG standards that we expect our third-party partners, contractors, and suppliers to adhere to.

We kindly request your commitment to embody and put into practice the desired behaviors outlined in our Code of Ethics, by signing and returning Nakilat's Third-Party Code of Conduct to your usual contact within Nakilat.

We thank you for supporting our mutual commitment to be recognized as entities conducting their business with integrity, responsible and ethical business practices.

Yours sincerely,

Eng. Abdullah Fadhalah Al-Sulaiti

Chief Executive Officer, Nakilat



Introduction

As a leading organisation within the LNG shipping industry, we understand the importance of engaging and collaborating with our third-party partners, contractors, and suppliers to drive the continuous improvement of sustainable business practices throughout our third-party networks. We believe this will further strengthen our business resilience and create shared value for our stakeholders and wider society.

Nakilat is committed to a policy of fair dealing and integrity in all aspects of its business. When acting on business transactions involving or related to Nakilat, partners/contractors must comply with all laws, behave with integrity and treat all organizations and people in a fair and honest manner. This Third-Party Code of Conduct summarizes the minimum standards that Nakilat expects its suppliers and contractors to adhere to. By acceptance of this Code, the partner agrees that all agreement and business relationships with Nakilat are subject to the provisions contained herein.

1.1 Who the Third-Party Code of Conduct applies to?

Nakilat's Third Party Code of Conduct (TPCoC) applies to providers of goods and services, – their employees, management, officers and Directors – in their work relationship with Nakilat through any type of contractual agreement.

The group that we collectively call "Third Party" includes but is not limited to suppliers, subcontractors, partners, service providers, professional service providers, consultants, intermediaries, brokers, and agents. As a third party, you must ensure that the practices and principles outlined in Nakilat's Third Party Code of Conduct are cascaded down throughout your own third-party networks.

1.2 Reporting misconduct

Nakilat believes that a strong ethical culture depends in part upon creating an environment in which employees feel free to report instances of non-compliance with our TPCoC. Such non-compliance might include suspected or potentially illegal or unethical conduct (collectively called misconduct). We are committed to investigating reports of suspected or known misconduct, and to taking appropriate action based on our findings. Similarly, we count on third parties reporting to us suspected or known misconduct. Suspected or known misconduct must be reported by speaking with the relevant Nakilat manager / point of contact, or alternatively, you may report suspected or known misconduct confidentially and anonymously to the following email address: compliance_reporting@nakilat.com.



1.3 No retaliation

Nakilat does not retaliate against anyone for submitting in good faith a report of suspected or known misconduct, nor do we tolerate others retaliating. Similarly, you must not retaliate or tolerate retaliation against anyone who, in good faith, reports suspected or known misconduct. "Good faith" means that a person's reasonable knowledge and belief, everything reported is true and that everything known is reported.

1.4 Auditing

Nakilat reserves the right to monitor and audit each third party's compliance with our TPCoC. Accordingly, you are required to cooperate by providing relevant information that we request, and by making individuals and records accessible so Nakilat can conduct a meaningful audit. Similarly, you should evaluate and monitor your third-party networks to ensure compliance with our TPCoC, and conduct audits of your third-party networks when requested by Nakilat. Any non-compliance by you or your third party must be effectively remediated both in a timely manner and at no additional cost to us or our customers.

Any third parties not meeting our requirements of our TPCoC will be subject to measures, which may include a remediation process or the implementation of contractual remedies.

Breaches of the TPCoC may negatively impact your business relationship with Nakilat, which may lead to a termination of contract if corrective measures have not been satisfactorily implemented.

2. Environmental, Social and Governance goals

2.1 Environment

Nakilat is committed to promoting environmental stewardship around the world. Therefore, Nakilat insists that its contractors, suppliers and others who work with it, at a minimum, follow the appropriate laws and regulations. The partner shall strive to achieve best practices for the environment and ensure compliance with all applicable laws and regulations. The partner must carry out business in such a way that maximum efforts are made to:

- Protect the internal and external environment,
- Prevent all accidents and injuries,
- Treat waste safely and systematically,
- Abide by a responsible sourcing of minerals, if applicable,
- Understand and manage risk, by establishing and implementing appropriate management systems that identify, assess, and mitigate all material environmental impacts associated with your products and/or services,



- Minimize your negative impact on the biodiversity, climate change and water scarcity, and,
- Use resources efficiently, apply energy-efficient and environmentally friendly technologies and reduce waste (Hazardous and Non-Hazardous), as well as emissions to air, water and land.
- Work together with partners to improve sustainable practices in the maritime industry,
- Promote the safer and environmentally sound development, manufacturing, transport, use and disposal of your products and/or services.
- You support and contribute to a circular economy.

2.2 Social

Human rights

The partner must comply with internationally proclaimed Human Rights as defined in the Universal Declaration of Human Rights.

Labor laws

Partners must comply with applicable labor and social security laws, in addition, the partner must, under no circumstances, use or in any other way benefit from forced or compulsory labor as set out in International Labor Organization's ("ILO") conventions. The partner must ensure that its employees work in compliance with all applicable laws and mandatory industry standards pertaining to the number of hours and days worked. The partner shall not discriminate in hiring and employment practices.

Child Labor

The partner shall comply with all conventions or guidelines in relation to the prevention of child labor adopted by the ILO including, without limitation, the Minimum Age Convention.

Respect

Your employees are treated with respect and provided a workplace free of harassments or abuse of any kind, harsh, and inhumane treatment, unlawful practices, or discrimination.

Employee wellbeing

The Partner shall ensure that minimum wages and working hours are in accordance with local laws. Personal data corresponding to your employees should be protected in accordance with applicable law.



• 2.3 Governance

Fair Competition Laws

Competition or antitrust laws are designed to ensure a fair and competitive free-market system. As Nakilat competes vigorously in the marketplace, it is obliged to comply with the applicable competition and antitrust laws wherever it does business and it expects the same from its partners.

Anti-Corruption

All forms of corruption are strictly prohibited. In all its activities, the partner must never, directly or through intermediaries, offer or promise any personal or improper advantage in order to obtain or retain a business or other advantage from a partner, whether public or private. Nor must the partner accept any such advantage in return, this include but not limited to bribery, corruption, money laundering, gift to private or public officials that may aim to influence business decisions or otherwise encourage them to act contrary to their obligation.

Conflicts of Interest

All measures should be taken to avoid all situations that present a potential conflict of interests. Actions that might involve a conflict of interest, or the appearance of one, should be fully disclosed in writing to Nakilat for review and approval as soon as the conflict occurs.

Sanctions

The partner represents and warrants complying with the provisions of economic sanctions and embargoes regulations. The partner further represents and warrants that it is not identified nor listed by the United States, European Union, or United Nations as a "Blocked Person", "Denied Person" or "Specially Designated National".

Compliance with laws and regulations

It is Nakilat's policy to conduct its business in compliance with all laws, regulations, and other legal requirements applicable to Nakilat in whichever jurisdiction Nakilat is doing business. The partner shall endeavor to ensure compliance with such laws, regulations and other legal requirements including and not limited to international trade laws, sanction regimes, antitrust, ISM code, SOLAS Convention, STCW, MARPOL and MLC convention in any jurisdiction in which they are working with or for Nakilat.

Protecting Assets and Resources

Proper protection and use of company assets, including proprietary information, is a fundamental responsibility of the partner, its employees and any partner appointed to act on their behalf.



Confidentiality

All discussions and information received from Nakilat must be treated confidentially by the partner, its employees and any partner appointed to act on their behalf. The partner shall ensure the respect of privacy and confidential information of all his employees and business partners as well as protect data and intellectual property from misuse.

Management System

The partner shall implement an appropriate compliance management system, which facilitates compliance with applicable laws, regulations, and standards.

Priority might be given to a partner who can demonstrate the implementation of such standard through ISO certification.

2.4 Safety and Health

Nakilat is committed to providing and promoting a safe and healthy work environment. There are extensive local and national laws designed to promote a safe workplace and these laws are strictly enforced. Extensive and continuous training and regular safety audits are essential for understanding and complying with safety laws. Therefore, the partner must comply with all applicable laws regarding working conditions and should seek to ensure the health and safety of your employees.

The partner must protect their employees' health and wellbeing, as well as the general public at large against hazards inherent in your processes and product.



شركة قطر لنقل الغاز المحدودة (ناقلات)
Qatar Gas Transport Company Ltd. (NAKILAT)

EXTERNAL

Nakilat may conduct audits or assessments to ensure your compliance and will take appropriate steps regarding our relationship with you if there is a reason for concern. Nakilat reserves the right to discontinue any relationship for non-adherence to principles set out in this TPCoC, failure to correct any violations, or displaying patterns of non-compliance with these standards.

In closing, we would like to re-emphasize that we require you to report any significant non-compliance with TPCoC standards, and any significant changes in your way of doing business to TPCoC@nakilat.com.

The requirements in this document may be periodically updated to reflect changes in laws, regulations, and industry standards. Nakilat will inform its third-party partners, contractors and suppliers of any changes and undertake checks and audits to ensure compliance with its requirements.

I hereby confirm that shall comply with this Third-Party Code of Conduct.

Name _____

Position _____

Date _____

Signed _____