



Document type	Governing procedure		
GMS Document no.	447	Release no.	3
Approver	The Board of Directors	Date	22.03.18
Owner	President & CEO	Date	15.03.18
Supplier Code of Conduct			

Supplier Code of Conduct

As approved by the Board of Directors 22 March 2018

The Supplier Code of Conduct (the “Code”) formalises the key principles under which suppliers to Höegh LNG Holdings Ltd. (“HLNG”), any subsidiary, other associated company or companies under management by HLNG, are required to operate.

Suppliers, including agents, lobbyists and intermediaries, are required to comply with this Code, and are accountable for ensuring that their sub-contractors, subsidiaries and associated companies comply with the Code and are informed of same.

1. Compliance with laws and regulations

The Supplier shall comply with all applicable local and international laws and regulations. Where the requirements of such laws and this Code differ, or are in conflict, the Supplier shall comply with the highest standard consistent with applicable laws.

2. Human rights

The Supplier shall respect internationally proclaimed human rights, and shall avoid being complicit in human rights abuses of any kind. In conducting its business, the Supplier shall consistently respect the personal dignity, privacy and rights of each individual.

3. Forced labour

The Supplier shall respect internationally recognized principles under the International Labour Organization’s (“ILO”) core conventions. The Supplier shall not use or tolerate any form of forced, bonded or compulsory labour and shall strictly prohibit any form of slavery or human trafficking. The Supplier shall ensure that all workers are free to leave their employment after giving reasonable notice.

4. Minimum age of labour

The Supplier shall not employ or use child labour. In this Code “child” means anyone under 15 years of age and “child labour” means any work by a child or young person unless it is considered acceptable under the ILO Minimum Age Convention 1973 (C 138). If the Supplier discovers that child labour is used, the Supplier shall address and rectify the situation immediately.

5. Discrimination

The Supplier shall treat employees equally and fairly. The Supplier shall oppose and not tolerate any form of harassment or discrimination, based on race, ethnicity, nationality or other origin, disability, age, gender, sexual orientation, language, religion or any other characteristic where a person is not treated as an individual.



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6. Employment conditions

The Supplier shall provide remuneration that meets any national legal standard on minimum wage. The basis on which workers are paid is to be clearly conveyed to them in a timely manner. The Supplier shall secure that working hours are not excessive.

The Supplier shall secure that all workers have written and legally binding agreements of employment setting out employment conditions in a language understandable to the worker.

7. Freedom of association and the right to collective bargaining

The Supplier shall recognise and respect the right of free association and the right to collective bargaining of its employees and/or workers consistent with local laws and regulations.

Where the right to freedom of association and collective bargaining are restricted under national law, the Supplier shall allow workers to influence their work situation.

8. Health and safety

The Supplier shall secure that the workers have a healthy and safe working environment in accordance with local and internationally recognised standards.

9. Environment

The Supplier shall act in accordance with relevant local and internationally recognised environmental standards, and strive to minimise its environmental impact and continuously improve its environmental performance.

10. Privacy, confidentiality and data protection

The Supplier shall respect the privacy of all individuals, and will handle personal data responsibly and in compliance with applicable privacy laws. The Supplier shall also safeguard business information, including confidential and proprietary information relating to HLNG.

11. Corruption and other prohibited business practices

HLNG is firmly opposed to all forms of corruption. HLNG's objective is to compete in the marketplace based on competitive services and prices. Under no circumstances whatsoever, shall HLNG Representatives solicit, receive, accept or agree to receive or accept, directly or indirectly, any financial or other advantage, including bribes (i.e. kick back, side payment, or profit sharing) in connection to a position, office or assignment. It is not required that the improper advantage has actually influenced a decision or inaction for the advantage to constitute corruption.

The Supplier is obliged to report to HLNG's Compliance Officer (e-mail compliance@hoeghlng.com) any suspicion they might have about any corruption, fraud or improper conduct in relation to the contract with HLNG.

HLNG expects the Supplier to comply with applicable laws and regulations concerning bribery, corruption, fraud and any other prohibited business practices. The Supplier shall not offer, promise or



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give any financial or other advantage, favour or incentive to any public official, international organisation or any other private third party in connection to a position, office or assignment. This applies regardless of whether the undue advantage is offered directly or through an intermediary.

12. Gifts, hospitality and expenses

Employees of HLNG are prohibited from accepting anything more than modest gifts from Suppliers. Gifts of cash or cash equivalents (i.e. gift cards), are never allowed. Hospitality, such as social events, meals or entertainment may be offered if there is a business purpose involved, and the cost is kept within reasonable limits. Travel expenses for the individual representing HLNG shall be paid by HLNG.

Gifts shall not be offered or received in situations of contract negotiation, bidding or award.

The Supplier shall not, directly or indirectly, offer or give any gifts or hospitality to any third party, including public officials, in order to obtain or retain business or a business advantage on HLNG's behalf.

13. Conflict of interest

Suppliers are expected to disclose to HLNG's Compliance Officer (e-mail compliance@hoeghlng.com) any situation that may appear as a conflict of interest, and disclose to HLNG's Compliance Officer if any HLNG director, officer, employee or professional under contract with HLNG may have an interest of any kind in the Supplier's business or any kind of economic ties with the Supplier or its employees.

14. Fair competition

The Supplier shall avoid involvement in any anti-competitive activity or business practice. The Supplier shall comply with all applicable competition laws.

15. Money laundering prevention

The Supplier shall only conduct business with reputable partners involved in legitimate business activities with funds derived from legitimate sources. The Supplier shall comply with all applicable anti-money laundering and anti-terrorist financing laws.

16. Sanctions

The Supplier shall take reasonable steps to ensure that no entity or person subject to United Nations, United States, United Kingdom, European Union or other applicable sanctions laws and regulations is involved in or unlawfully benefits from the Supplier's operations. The Supplier shall also prevent involvement in any transaction or activity prohibited by applicable sanctions law and regulations.

17. Violation of the Code

Breach of the Code may result in actions being invoked against the Supplier, in addition to any contractual or legal remedies. The actions applied will depend on the nature and seriousness of the breach and on the degree of commitment shown by the Supplier. The range of actions available to be imposed on the Supplier includes, but is not limited to, the following:

- Formal warnings: That the continued non-compliance will lead to more severe actions



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- Disclosure of nature of breach to all sub-contractors, subsidiaries and associate companies
- Immediate termination of contract, without recourse

The Supplier must maintain all documents necessary to demonstrate compliance with the Code. The Supplier shall allow representatives from HLNG and, if requested, HLNG's customers, full access to its facilities, worker records and workers for confidential interviews.

18. Enclosures

- Annex A: Compliance Certificate



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ACKNOWLEDGEMENT

This is to certify that I have fully read the Code attached and understand the responsibilities as a supplier to HLNG or any subsidiary or other associated company. Having fully read and understood the requirements of the Code, I hereby commit myself and my company to comply with the Code and its principles.

We confirm that we will report any matters under the Code to Höegh LNG's Compliance Officer: compliance@hoeghlng.com. I certify that I am authorised by my company to sign and accept this Compliance Certificate on its behalf.

I am aware that this signed Compliance Certificate will be filed with the company's records with HLNG.

Supplier/ Company name (type or print name)

Address

Representative (type or print name and business title)

Signature