

Suppliers Code of Conduct

Version 1.0 (January 2018)

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1. Introduction

The Lazada Supplier Code of Conduct (the "Code") shall be applicable to all suppliers of the Lazada Group and all of its direct or indirect subsidiaries and affiliated companies (collectively known as "Lazada").

This Code takes into account Lazada's internal guidelines and policies and sets out to define the behavior of its suppliers in providing goods and services. Lazada is committed to doing business in a legal, fair and ethical manner and expects all its business partners to be similarly committed.

This Code shall apply to all suppliers as well as any entity who provides such goods/ services indirectly to Lazada through such suppliers.

This Code shall be made available to our suppliers and is a condition to contract. Lazada reserves the right to terminate the contract with any supplier who is found to have violated any part of this Code.

2. Laws and Regulations

All suppliers are expected to comply with all applicable laws and regulations of the countries where they operate in and where goods and services are provided. Such laws shall include without limitation employment/ labor laws, taxation, company law, personal data protection, etc.

Where there are any discrepancies between the requirements of this Code and prevailing laws / regulations, the stricter one shall apply.

3. Ethics

Suppliers are expected to conduct their business in an ethical manner and with integrity.

3.1. Anti-Bribery and Corruption

Any form of fraud, corruption, extortion or other behavior involving improper benefits shall be strictly prohibited. Suppliers will not offer or accept bribes or other unlawful/improper benefits/ advantages from their business partners. Suppliers shall not offer any form of benefits or gratification to Lazada employees to obtain an unfair business advantage.

3.2. No Gift Policy

Lazada observes a strict "No-Gift Policy". Suppliers are reminded not to offer gifts of any amount to Lazada and/or its employees before, during or after the contract period.

3.3. Conflict of Interest

Suppliers shall disclose, at the first instance, if there is a potential conflict of interest relating to its potential and/or existing contractual relationship with Lazada. Suppliers shall also disclose, at the commencement of its contractual relationship with Lazada, any actual or potential conflict of interest.

3.4. Fair Competition

Suppliers shall adopt fair practices and ensure its business practices are in line with all applicable anti-trust laws.

3.5. Privacy & Intellectual Property

Suppliers shall comply with all relevant data privacy laws and regulations with regards to the collection, disclosure, retention and/or processing of the personal data of Lazada customers and employees.

Suppliers are reminded not to infringe any intellectual rights, copyrights, patents and trademarks. Where any intellectual property rights are developed as part of the contractual arrangement with Lazada, the ownership of such intellectual property right shall be as defined in the signed contract.

3.6. Reporting of Concerns

Suppliers may report any concerns, known and/or suspected fraud / wrongdoing via the following means:

- Email: whistleblow@lazada.com
- Online reporting tool: <https://whistleblower.lazada.com/>

Lazada shall observe the following principles with regards to any such concerns/ issues raised in good faith:

- a. Confidentiality: - All reports made and the identities of the whistleblowers will be kept strictly confidential, to the extent allowed by law and the needs of the investigation.
- b. Retaliation: - Lazada does not tolerate any form of retaliation, reprisals or harassment against whistleblowers.

However, Lazada reserves the rights to consider any malicious/ frivolous complaints as a material breach of contract.

4. Human Rights, Discrimination and Labour

Suppliers are expected to protect the human rights of their employees and to treat them with dignity and respect. This includes but is not limited to the following aspects:

Suppliers shall ensure that their employees meet the minimum requirements under the applicable local laws and regulations. This shall include (but not limited to) the payment of minimum wage, contribution to provident/ retirement fund, overtime hours and pay, mandatory rest time, minimum working age, etc.

Suppliers shall ensure that no employee is forced to work and is given fair opportunity to work in an environment that is free from discrimination, harassment, or coercion.

5. Health, Safety, Environment and Quality

Suppliers are expected to provide a safe and healthy working environment that caters to the well-being of their employees.

Suppliers shall be expected to meet generally recognized and/or contractually agreed quality, health, safety and environmental requirements in order to provide goods and services that consistently meet Lazada's needs. Suppliers shall be responsible for ensuring that all required permits, licenses and registrations will be obtained, maintained and kept up-to-date.

Suppliers shall put in adequate measures to protect their employees from any chemical, biological and physical hazards.

Lazada reserves our right to audit business/facilities location to ensure compliance with/without advance notice.

6. Security

Suppliers shall maintain processes and standards that are designed to assure the integrity of each shipment to Lazada from its origin through to its destination and all points in between.

7. Management Systems

Suppliers are expected to implement management systems to facilitate compliance with all applicable laws and to promote continuous improvement with respect to the expectations set forth in this Code. This includes the following aspects:

7.1. Communications

Suppliers shall ensure adequate communication on the principles set forth in this Code to their managers, employees as well as their supply chain and ensure strict compliance to the principles of this Code.

7.2. Commitment and Accountability

Suppliers are encouraged to fulfill the expectations set forth in this Code by allocating appropriate resources.

7.3. Risk Management

Suppliers are expected to implement appropriate measures to manage any compliance risk exposures stated in this Code and/or mechanisms to identify, determine and manage risks in all areas addressed by this Code and with respect to all applicable legal requirements.

7.4. Compliance with this Code

Lazada reserves the right to conduct checks on Supplier's compliance to the requirements of this Code. Any breach of the obligations stated in this Code may be considered as a material breach of contract by the Supplier for which Lazada will reserve the right to exercise its rights in accordance with the provisions stated in the Contract.