

Purpose

The Sustainable Procurement Policy aims to integrate environmental, social and governance (ESG) considerations into our procurement process to align with the Corporation's three environmental and social objectives: (1) Social Inclusion, (2) Advancement and Opportunities, and (3) Greenhouse Gas Emissions Reduction.

This Policy reinforces our commitment to responsible business practices, resource efficiency, and supplier engagement, contributing to the long-term success of the Corporation and our supply chain.

Our Commitment

We are committed to conducting all procurement activities with integrity, ensuring impartial business decisions free of conflicts of interest, bribery and unethical behaviors, and undue influence.

We have established clear procedures and guidelines to outline our procurement process, responsibilities, approvals and authority levels for the procurement of works, goods and services.

Depending on the complexity, value and risk associated with specific procurement activities, prospective tenderers are assessed before they are selected as MTR suppliers.

We are also committed to eliminating discrimination in our policies and practices, providing equal opportunities and enhancing supplier diversity.

Requirements in Our Supply Chain:

- **Legal Compliance** - Ensure that our suppliers comply with all applicable health, safety, environmental and labour laws and regulations.
- **Anti-bribery and integrity** - Enforce a zero-tolerance policy towards unethical business activities such as corruption, bribery and illegal practices. Ensure ethics and compliance in the workplace and fair competition in procurement activities.
- **Environmental and Social Considerations** - Integrate environmental and social requirements for suppliers at various stages of the procurement process, where applicable and practicable, to strengthen our resilience and adaptation to climate-related risks and promote fair access to opportunity.
- **Ethics and Business Conduct** - Require all of our suppliers to comply with our [Supplier Code of Practice](#) to ensure high standards in relation to ethical business practices, human and labour rights, environmental protection, supply chain management, and cyber security are met.

The Corporation reserves the right to suspend or terminate suppliers found in violation of the above requirements. Supplementing our policies on ethical behaviors, we also implement [MTR's Whistleblowing Policy](#) which provides a confidential channel to receive complaints from all internal and external stakeholders in relation to fraudulent acts, unethical acts or actual or potential non-compliance with laws and regulations and/or the Corporation's policies.

Supplier Development and Collaboration

The Corporation engages and collaborates with our suppliers to enhance their sustainability performance and drive continuous improvement by sharing best practices and implementing capability-building initiatives to strive for a sustainable supply chain through the following practices:

- **Supplier Development** – enhance suppliers' sustainability practices through education sessions, training, and communications.
- **Supplier Collaboration** – promote and maintain the MTR Green Procurement List with reference to government guidelines and eco-labelling schemes. Implementing an incentive scheme to encourage adoption of sustainability practices. Encourage innovation in supply chain to achieve sustainable outcomes.
- **Supplier Monitoring** – conduct supplier assurance and review meetings to assess the operations, quality, safety, risks and ESG performance of our suppliers; suppliers who fail to meet relevant health, safety, environmental and/or labour laws and regulations will be suspended from tendering.
- **Feedback Mechanisms** – establish a channel to collect feedback from both suppliers and internal stakeholders to continuously improve our sustainable procurement practices.

Continuous Improvement

The Corporation will periodically review this policy as needed to align with new legislative requirements, industry best practices and sustainability strategies of the Corporation.

Reference Materials

This policy should be adopted in conjunction with the following policies and requirements of the Corporation:

1. [Supplier Code of Practice](#)
2. [Environmental & Social Responsibility Policy](#)
3. [Modern Slavery and Human Trafficking Statement](#)
4. [Workforce Diversity Policy](#)
5. [Whistleblowing Policy](#)

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