

## **SUPPLIER CODE OF CONDUCT**

### **PURPOSE**

To maintain the trust of our stakeholders, we rely on our suppliers, manufacturers, contractors, vendors, and others, to adopt and implement certain standards of integrity, values, and operating principles that are consistent and aligned with the elements and principles of Keepers' sustainability standards. This code guides every organization participating in Keepers' supply chain for products and services on how they can align their business operating standards.

### **SCOPE OF APPLICATION**

This code applies to all companies and organizations in the supply chain involving products and services provided to Keepers and its subsidiaries, regardless of brand.

### **MONITORING COMPLIANCE**

Suppliers must ensure that their activities are in line and consistent with the operating principles adopted in this Code. While compliance with the Code is the Supplier's primary responsibility, Keepers may verify and assess Supplier compliance with the Code using a variety of modalities, including self-evaluation of suppliers or audits conducted by Keepers or a Keepers-authorized service provider.

During the compliance monitoring process, Keepers expects full collaboration and openness from suppliers. We expect the supplier to promote and facilitate any communication with employees needed for audits, and to refrain from taking any retaliatory action against workers who participate in this process. Keepers or a Keepers-authorized supplier may visit facilities regularly to check the success of improvement programs.

Keepers has the right to seek corrective action if a supplier fails to comply with the Code. If a supplier fails to take corrective action or fails to comply with the Code, Keepers may, in its sole discretion and without further obligation to suppliers, suspend or terminate its relationship with the supplier in whole or in part.

### **PRINCIPLES**

#### **I. COMPLIANCE WITH APPLICABLE LAWS, POLICIES & GOVERNING TERMS**

Suppliers, including all their sub-suppliers, sub-contractors, and other sub-service providers must abide by all applicable laws, rules, and regulations of the country in which the company is conducted as well as Keepers' Supplier Code of Conduct.

#### **ETHICAL CONDUCT**

Suppliers must ensure that their actions, decisions, and behaviors are consistent with ethical business governance standards and practices.

### **Anti-Bribery, Anti-Corruption & Anti-Money Laundering**

Suppliers must comply with respective anti-bribery, anti-corruption, and anti-money laundering laws and regulations in all jurisdictions in which they operate. Suppliers must not offer, pay, receive or solicit bribes, kickbacks, payments, favors, or gifts of any kind, either directly or indirectly, to gain favorable outcomes.

### **Fraud**

Suppliers must not commit fraud, including asset theft and false representation of facts.

### **Gifts and Entertainment**

Suppliers must not give presents or entertainment that may be seen and construed as an attempt to influence a business choice, establish an obligation to do something in return, or serve as a personal reward for making a business decision.

### **Information Security**

If you provide digital, online, or support services and/or access sensitive information, make sure you have solid security measures in place to protect Keepers. Follow Keepers' Data Privacy and Cybersecurity Policy.

### **Confidentiality**

Suppliers must comply with the confidentiality requirements of Keepers.

### **Conflict of Interest**

Suppliers must avoid impropriety and conflicts of interest, as well as the impression of both. Suppliers must not deal directly with any Keepers employee who has a financial interest in the Supplier through their spouse, domestic partner, other family members, or relative.

## **II. EMPLOYMENT STANDARDS**

Keepers protects the human rights of its employees, consumers, supply chain partners, and vendors. We expect our suppliers to align with our principles and commit to treating people with dignity and respecting their human rights. We specifically request that you monitor and enforce adherence to these standards for employees in vulnerable populations, such as migratory workers, women, and young people. Keepers's minimal employment and labor requirements are outlined in this Code.

You must, however, be aware of your duties under applicable local laws and regulations, as well as comply with the stricter requirements that apply to your operation.

### **Child Labor**

There must be no employment of a child who is under 15 years old or at the age at which the child is permitted to work in that country. Employees between the ages of 16 and 18 must have suitable working hours, conditions, and other benefits that do not threaten their health or safety or jeopardize their education.

### **Forced Labor**

There must be no involuntary labor practices, such as forced, bonded, trafficking, prison labor, or any practices that are against an employee's will that use violence, intimidation, constraint, mental or physical methods, or arbitrarily limit their freedom of action in your operations and supply chain.

Keep an eye out for any indicators of forced labor, especially among vulnerable employees such as migrant laborers, women, and young people. All employees must engage in employment willingly and have the right to discontinue employment in line with applicable laws.

### **Working Hours**

Suppliers must follow all applicable laws on working hours, breaks, and holidays. If work exceeds the statutory working hours, overtime payment should be provided as compensation in accordance with applicable laws and regulations.

Working hours must be properly recorded using an accurate and dependable timekeeping and record system, and they must also include working hours for individuals who are paid on a piece-rate basis. Employees must be able to verify working hours data.

### **Wages and Benefits Package**

Suppliers shall adhere to respective national wage and benefit regulations. Wages and other benefits must be paid and deducted in line with applicable regulations, and records must be preserved. Wages must include overtime allowances and be provided to employees clearly and understandably.

Every employee must be provided with a written employment contract including information about their position, exact compensation, payday, and payment method.

### **Violence, Harassment, and Discrimination**

There must be no violence, harassment, and discrimination in the workplace. Employees should not be subjected to verbal, physical, or sexual abuse, harassment, or intimidation in the workplace.

Employees must not be discriminated against based on race, color, gender, social background, sexual orientation, ethnicity, national origin, disability, pregnancy, religion, political affiliation, marital status, medical condition, or any other personal characteristic prohibited by law or regulation applicable to your operation at any time during the employment relationship, including during hiring. All employment decisions must be based on factors linked to the capacity to complete the needed work.

### **Freedom of Speech and Association**

Suppliers should encourage open communication with their employees so that they may express their issues, thoughts, and ideas to improve their processes and work efficiency.

### **Whistleblowing**

Suppliers must provide a mechanism for their employees to report any workplace issues and concerns. This means must be available to all employees. Furthermore, the secrecy of every received report is protected and only shared as needed to perform an investigation and handle the report's closure. No employee who has made a report in good faith should face retaliation.

### **III. QUALITY STANDARD**

Suppliers must meet the quality standards in manufacturing, delivering, and supplying products and/or services. Suppliers must provide safe, high-quality products. Food and product safety and quality requirements must be met or exceeded as required by applicable laws and regulations for the products and services created and/or provided.

### **IV. HEALTH AND SAFETY**

Suppliers must provide employees with a safe and healthy working environment that complies with applicable regulations and preventive measures for accidents, injuries, and mental concerns that may lead to possible health and safety issues.

#### **Equipment Safety and Accident Prevention**

Suppliers must comply with national legislation and quality standards relevant to facilities, equipment, and personnel. Suppliers must also undertake regular safety checks of their facilities and must take precautions to avoid hazards associated with the usage of equipment machinery.

Employee training must be adequately and regularly provided and records must be kept. Employees should be provided with suitable personnel protective equipment when using the equipment and machinery at no cost to prevent employee health and safety concerns.

#### **Working Environment**

Suppliers must provide their employees with enough lighting and ventilation at all times. Suppliers must provide clean, sanitary, appropriate restrooms for the employees. Suppliers must also assess and eliminate any dangers in the workplace for women after childbirth, during pregnancy, or while breastfeeding.

#### **Fire Prevention and Disaster Prevention**

Suppliers must comply with building and fire codes and ordinances at all times.

Suppliers must ensure that all working facilities have safety and emergency preventive measures in place to avoid accidents or injuries. All facilities must have operational fire alarms, fire extinguishers, sprinklers, smoke detectors, and necessary firefighting and preventative equipment and exit routes must always be clear from obstruction, and emergency evacuation is always possible.

Employees must get regular safety training.

## V. ENVIRONMENTAL PROTECTION AND COMPLIANCE

Keepers is committed to minimizing the environmental impact of our activities by promoting sustainable practices and adhering to relevant environmental laws and regulations. We expect our Suppliers to support this commitment and follow these guidelines:

- Understand and comply with all national and local environmental laws, rules, regulations, administrative processes, and policies when conducting business. This includes emissions into the atmosphere and aquatic bodies, solid waste disposal, and the management and disposal of hazardous materials.
- When hazardous or polluting materials are discharged inappropriately, the appropriate authorities must be alerted, and action must be taken to repair and mitigate the environmental damage.
- Disclose comprehensive, consistent, and accurate scope 1, 2, and 3 greenhouse gas (GHG) emissions data.