



Page 1 of 6	Issue Date: 23-10-2023	Prepared by: Sustainable Procurement Committee / Jim O'Day	
	Effective Date: 23-10-23		

## 1. Purpose

Vibrantz Technologies Inc., on behalf of itself and its affiliates (collectively, “Vibrantz”), expects its suppliers, and their contractors and agents (collectively “Suppliers”), to act with integrity and treat people and the environment with respect. The Vibrantz Supplier Code of Conduct (“Supplier Code of Conduct”) outlines the minimum requirements and expectations for the ethical behavior of all Suppliers to Vibrantz. Upon delivery of any good or service to Vibrantz, all suppliers certify that they comply with the requirements and standards contained in the Supplier Code of Conduct. Vibrantz reserves the right to immediately discontinue business relationships with suppliers who violate any policy or standard contained in the Supplier Code of Conduct.

The Supplier Code of Conduct is based on the following main principles:

- compliance with all applicable laws and regulations
- respect for human rights and fair treatment of all employees
- protection of the environment
- promoting ethical business practices and fair competition

## 2. Compliance with Laws

All Suppliers must fully comply with all applicable national, state and/or local laws, regulations, and ordinances.

## 3. Health and Safety

Suppliers must provide safe and healthy working environments in compliance with all applicable laws and regulations, and work to eliminate or properly manage any risks to employees. Suppliers must provide employee training, appropriate personal protective equipment and maintain the equipment and facilities in safe operating conditions.

### a. Occupational Health and Safety

Suppliers will protect workers from chemical, biological or physical hazards in the workplace. Suppliers must have policies that prohibit violence, harassment and threats of violence in the workplace.

### b. Product Safety

Safety information relating to hazardous materials must be made available to workers to educate, train, and protect workers from hazards.

Suppliers must label and identify products according to hazards and regulations and provide Safety Data Sheets (SDS) for all products.

Suppliers must notify Vibrantz of any product safety issues and must investigate and correct any issues, including product recall if necessary.



	Issue Date: 23-10-2023	Prepared by: Sustainable Procurement Committee / Jim O'Day	
Page 2 of 6	Effective Date: 23-10-23		

c. Emergency Preparedness and Response

Suppliers will identify and assess health and safety emergency situations in the workplace and minimize their impact by implementing emergency action plans and response procedures.

**4. Labor Standards and Human Rights**

Vibrantz is committed to the highest labor standards and human rights practices.

a. Freely Chosen Employment/ Child Labor and Employee Human Rights

Vibrantz forbids the use of child and compulsory labor, human trafficking and slavery, unsafe and hazardous working conditions and environments, and any behavior that does not maintain human dignity and respect. Suppliers must comply with all relevant laws and regulations related to young workers. Compliance with any current or emerging forced labor prevention laws, such as The Uyghur Forced Labor Prevention Act is expected of our suppliers. Suppliers must take reasonable measures and due diligence to ensure its full supply chain does not engage in such acts.

b. Equal Employment

Suppliers must implement hiring practices that prohibit discrimination on the basis of age, culture and language, disability, ethnicity, gender identity, marital or family status, national origin, race or color, religious beliefs, sex, sexual orientation, or any other characteristic protected by law. These principles extend to all employment decisions, including recruiting, hiring, training, promotions, compensation, benefits, transfers and workforce reductions.

c. Wages, Benefits and Working Hours

Suppliers must comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours, rest and lunch breaks, provide legally mandated benefits and other elements of compensation. Vibrantz supports the payment of fair wages.

d. Fair Treatment

Vibrantz is committed to maintaining a culture of respect within our supply chain. We expect each individual to be treated with fairness and respect. Suppliers must provide a workplace free of harsh and inhumane treatment, including involving sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, or threats of any kind.

e. Freedom of Association and Collective Bargaining

Suppliers must respect the rights of workers to form and join or to refrain from joining trade unions of their choosing and to bargain collectively. Employees must be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation, or harassment.

	Issue Date: 23-10-2023	Prepared by: Sustainable Procurement Committee / Jim O'Day	
Page 3 of 6	Effective Date: 23-10-23		

f. Protection of Local Communities

Suppliers must respect the rights and opportunities of local communities and vulnerable groups.

**5. Conflict Minerals**

All suppliers shall have a policy to reasonably assure that the tin, tantalum, tungsten and gold (“Conflict Minerals”) in the materials they manufacture do not directly or indirectly finance or benefit armed groups that are perpetrators of human rights abuses in the Democratic Republic of the Congo or an adjoining country. All suppliers shall exercise due diligence on the source and chain of custody of the Conflict Minerals and make its due diligence measures available to Vibrantz upon request. All suppliers are responsible for putting a process in place to communicate these requirements to its suppliers and to monitor supplier compliance with these requirements.

**6. Chemicals of Concern**

All suppliers shall have a policy to assess current and emerging regulated “chemicals of concern” in the supply chain. These chemicals may vary across regions or countries, and we rely upon our suppliers to keep abreast of these potential substances and any restrictions that may be imposed upon their use in the market. Vibrantz expects these types of substances to be reported to us upon request and we may require possible actions to eliminate these as necessary in our supply chain.

**7. Sustainability and the Environment**

Vibrantz is committed to safeguarding the communities where we conduct business and the global environment. Our company recognizes the significance of setting goals and allocating resources to improve the environment, based on factors we can control such as our facilities, activities, and products. We monitor our performance and remain vigilant to any changes that may affect our operations, products, and personnel, which could have an impact on the environment.

a. Environment

Suppliers must operate their facilities in a manner that protects the environment and meets applicable laws and regulations relating to emissions, discharges, natural resources, waste material handling, biodiversity, and any other applicable environmental standards related to Suppliers operations.

Suppliers must ensure that the goods that it manufactures (including the inputs and components that it incorporates into its goods) comply with all applicable environmental laws and treaties. Supplier must ensure that it will only use packaging materials that comply with applicable environmental laws and treaties.

b. Environmental Services and Advocacy

We encourage our suppliers to actively engage in environmental advocacy. This includes participating in initiatives that promote sustainable practices, investing in eco-friendly technologies, and advocating for policies that protect the environment.

	Issue Date: 23-10-2023	Prepared by: Sustainable Procurement Committee / Jim O'Day	
Page 4 of 6	Effective Date: 23-10-23		

c. Emergency Preparedness

Suppliers must maintain systems in place to prevent and mitigate spills and releases of hazardous materials to the environment.

d. Sustainable Products

Vibrantz expects suppliers to innovate and develop sustainable products, to promote the substitution of hazardous materials (including the inputs and components that it incorporates into its goods) and to comply with all applicable environmental laws and treaties.

e. Climate Change

Vibrantz is committed to reduce its carbon footprint impact and encourages its suppliers to continuously improve their environmental impact by reducing their green-house gas emissions, foster programs to reduce energy and water consumption, and develop products with lower carbon footprint impact. Suppliers are encouraged to disclose carbon reduction plans and science-based emissions reductions targets.

f. Circular Economy

Vibrantz encourages its suppliers to improve their sourcing strategies to maximize the use of biodegradable, re-usable and recyclable materials in all products and packaging, whilst reducing their waste generation and emissions through material selection and product design.

**8. Ethical Behavior and Business Conduct**

All suppliers are expected to maintain the highest standards of honesty and integrity in all business practices in full cooperation with the Supplier Code of Conduct.

a. Conflicts of Interest

Suppliers must avoid all transactions or relationships that are or appear to be conflicts of interest.

b. Anti-Corruption

Suppliers must comply with all laws and regulations forbidding payment of money, products, gifts or services, directly or indirectly, to any individuals or entities in order to corruptly induce favorable business treatment or to corruptly affect governmental decisions. Any bribe or improper payment, whether or not it directly or indirectly benefits Vibrantz, is prohibited. Bribes include cash, kickbacks or kickback schemes, unexplained rebates, payments for advertising or other disguised allowances or expenses. In addition, all suppliers are required to fully comply with all applicable anti-corruption laws including, without limitation, the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.

	Issue Date: 23-10-2023	Prepared by: Sustainable Procurement Committee / Jim O'Day	
Page 5 of 6	Effective Date: 23-10-23		

c. Anticompetitive practices

Suppliers are strictly prohibited from engaging in any anticompetitive practices, including price-fixing, bid-rigging, market allocation, or any other activities that could hinder fair competition.

d. Gifts and Entertainment

Suppliers will not provide or offer any Vibrantz director, officer or employee or employee's family, any favors, gifts, loans or other benefits (including services and discounts as well as material goods), except casual entertainment or gifts (other than money) of nominal value that are customarily offered to others having a similar relationship with supplier and such conduct complies with applicable laws and the internal rules of Supplier and Vibrantz.

e. Trade compliance

Suppliers shall conduct their operations in full compliance with all applicable international trade rules and related standards, including but not limited to customs regulations, non-tariff barriers, international agreements, transportation conventions, trade and economic sanctions and anti-boycott laws.

f. Confidentiality

Suppliers must respect Vibrantz's proprietary and confidential information and maintain policies that enforce strict compliance with the confidentiality of such information.

g. Data Protection and Privacy

Vibrantz is committed to respecting the privacy of its employees, customers, and suppliers. Suppliers must fully comply with all applicable Data Privacy rules and regulations. Suppliers must implement:

- Policies regarding safeguarding of personal information and data which is transmitted, stored, or processed from unauthorized or unintended disclosure, ensuring that such information is used solely for legitimate business purposes, and handled in accordance with law.
- Security measures and access control procedures to ensure that personal data are accessible only to those with direct responsibility in a relevant job function and who have a need to know.

h. Quality and Service

Suppliers must comply with product and service agreements, price, specifications, and contracts, and promptly inform Vibrantz about any potential non-compliance. Any changes in process or manufacturing that may have an impact on product specification or delivery delays, should be communicated to Vibrantz in advance.



	Issue Date: 23-10-2023	Prepared by: Sustainable Procurement Committee / Jim O'Day	
Page 6 of 6	Effective Date: 23-10-23		

**9. Ineligible Suppliers**

Vibrantz reserves the right, in its sole discretion, to not engage or discontinue any relationship with a Supplier for non-adherence with applicable rules and regulations, violations of the Supplier Code of Conduct principles that are not promptly corrected, or for repetitive violations of these standards.

**10. Audits and Verification**

Vibrantz reserves the right to audit or verify the Supplier's compliance with this Supplier Code of Conduct.