

Supplier Code of Conduct

Introduction

SafeSource Direct is committed to the highest standards of integrity and social responsibility, and in turn expect all suppliers engaged in providing products and/or services to SafeSource Direct ("Suppliers") to adhere to the spirit of Safesource standards demonstrating the same level of commitment. The SafeSource Direct Supplier Code of Conduct ("Code") describes SafeSource Direct's expectations of how its Suppliers conduct business. SafeSource Direct expects Suppliers to act in accordance with the Code, and at a minimum requires that all Suppliers make all efforts to comply with applicable laws and regulations within the geographies where they operate and cooperative fully with the regulators enforcing such laws. In instances where expectations outlined in the Code differ from local laws, Suppliers must follow these expectations within the bounds of applicable local laws.

Overview

The Code reflects SafeSource Direct's values and sets forth what it expected of its Suppliers with respect to the following topics:

1. Ethics and integrity
2. Data privacy and security
3. Inclusion and diversity
4. Employment and working conditions
5. Wellbeing, health, and safety
6. Environment

Supplier Code of Conduct

Ethics and integrity

SafeSource Direct is committed to the highest ethical standards and compliance with all applicable laws, rules, and regulations. In particular, SafeSource Direct requires Suppliers to adhere to the following standards:

Bribery and anti-corruption

Suppliers must fully comply with requirements of all applicable bribery and anticorruption laws (e.g., U.S. Foreign Corrupt Practices Act, UK Bribery Act).

Gifts and entertainment

Suppliers must not offer or accept any gifts or gratuities that are unreasonable or illegal in nature. Modest, sensible gifts and entertainment are acceptable without further approval if valued at \$250 or less.

Advance approval from your manager is required for gifts over \$250. No gratuities should be accepted in efforts to obtain improper advantages or influence for the Supplier, SafeSource Direct (such as SafeSource



Direct's employees and their family members and associates), or any third party. Gifts and entertainment include anything of value, such as meals, tickets to events, fees, commissions, dividends, cash, gratuity, services, or any inducements.

Non-retaliation for reports of concern

SafeSource Direct expects Suppliers to have a policy and process for reporting of workplace concerns. The policy and process should be transparent and understandable and should protect reporting and participating individuals from retaliation.

Data privacy and security

SafeSource Direct requires its Suppliers to protect the privacy of individuals and the security of confidential assets and information.

Confidential assets and information

Suppliers must protect SafeSource Direct's and its clients' confidential assets and information. Suppliers must design and maintain processes to provide appropriate protections for this information.

Personal information and privacy

SafeSource Direct requires Suppliers to protect personal information in compliance with all applicable local laws. Personal information provided by or on behalf of SafeSource Direct should only be used, accessed, and disclosed as permitted by the Supplier agreement.

Inclusion and diversity

SafeSource Direct fosters an inclusive culture and believes diversity should be celebrated and discrimination of any form should not be tolerated.

Non-discrimination and diversity

Suppliers must comply with all applicable laws relating to discrimination in hiring, employment practices, and harassment and retaliation.

SafeSource Direct expects Suppliers to operate workplaces free of discrimination, harassment, victimization, and any other abuse on any grounds including but not limited to age, disability, ethnic or social origin, gender, gender identity, nationality, race, sexual orientation, marital status, parental status, pregnancy, political convictions, religious beliefs, union affiliation, or veteran status.

Employment and working conditions.

As a participant in the United Nations Global Compact, SafeSource Direct supports the Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. SafeSource Direct strives to adhere to the principles set forth in these standards and expects its Suppliers to do the same.

Modern slavery / human trafficking

SafeSource Direct does not tolerate slavery, forced labor, or human trafficking in any form. SafeSource Direct requires Suppliers to fully comply with the applicable legal requirements of slavery, forced labor and



human trafficking laws (e.g., UK Modern Slavery Act 2015), and expects Suppliers to enact practices to ensure compliance with such laws.

Child labor

SafeSource Direct does not tolerate child labor in any form. Suppliers must act in compliance with all laws regulating the minimum working age for each position, including any laws pertaining to the employment, apprenticeships, and internships of youths and students.

Human rights

SafeSource Direct does not tolerate human rights violations in any form. SafeSource Direct expects Suppliers to enact practices to maintain a respectful and safe workplace. SafeSource Direct expects Suppliers to not tolerate physical violence, threats, corporal punishment, mental coercion, verbal abuse, disrespectful behavior, bullying or harassment of any kind.

Employment laws

Suppliers must comply with all applicable local wage and labor laws. SafeSource Direct expects Suppliers to provide employees with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work. All use of temporary, dispatch and outsourced labor shall be in accordance with local law.

Wellbeing, health, and safety

SafeSource Direct expects Suppliers to implement sound health and safety practices across business operations.

Health and safety

Suppliers must comply with all applicable health and safety laws and regulations. SafeSource Direct expects Suppliers to adopt practices to minimize health and safety risks, support accident prevention, and ensure a safe workspace for all workers.

Environment

SafeSource Direct is committed to reducing the impact of its operations on the natural environment and collaborating with its Suppliers to do the same.

Environmental footprint

Suppliers must comply with all applicable environmental laws and regulations. SafeSource Direct expects Suppliers to measure, manage, and address energy usage and greenhouse gas (GHG) emissions. And, where applicable, expects its Suppliers to measure, manage and reduce water and waste in its operations.

Compliance with the Code

Violations

Suppliers are required to promptly report to SafeSource Direct legal violations or violations of the Code or other SafeSource Direct policy.



Suppliers must promptly forward to SafeSource Direct, if permitted by law, any subpoenas, regulatory requests, media inquiries, or other third-party requests concerning SafeSource Direct. To report a SafeSource Direct supplier please email purchasing@SafeSourcedirect.com (monitored 24 hours a day, 5 days a week). SafeSource Direct will keep the reported information confidential, provided it does not hinder any investigation and is permitted to do so by law.

SafeSource Direct's Rights

SafeSource Direct reserves the following rights to ensure and enforce Suppliers' compliance with the Code.

Supplier selection

SafeSource Direct will evaluate Suppliers' compliance with the Code during the Suppliers' evaluation and selection process, or upon SafeSource Direct's request.

Supplier assessment

During the Supplier certification process, Suppliers will be required to complete a self-assessment questionnaire on compliance with the Code. Suppliers may be asked to re-affirm compliance with the Code periodically. SafeSource Direct has the right to visit/audit suppliers with a 48-hour written notice.

Violations and termination

Supplier shall ensure that its subcontractors, if any, comply with the Code, and acknowledge that it is responsible for its subcontractors' violations. In the event of non-compliance with, or violation of, the Code, SafeSource Direct may give the Supplier a reasonable opportunity to respond with proposed corrective actions, unless the violation is severe or incurable, or there is a violation of law. SafeSource Direct may suspend or terminate its relationship with the Supplier and/or disclose the matter to the appropriate authorities if there is a violation of law.

Order of Precedence; Changes to the Code

The Code is not meant to, and does not, supersede any applicable law, or any term in an agreement between SafeSource Direct and a Supplier. To the extent there is any conflict between this Code and any applicable law or provision of any agreement, the applicable law or agreement controls. SafeSource Direct reserves the right to update or change the Code requirements upon notice. A copy of the Supplier Code of Conduct can be found on the company website, www.safesourcedirect.com.

Supplier's Certification of Compliance

By its acceptance of any purchase order from SafeSource Direct or the provision of any goods or services pursuant to a contract with SafeSource Direct, Supplier acknowledges acceptance of this Code and its agreement to comply with all requirements of this Code. This Code supplements, but does not supersede, any and all rights maintained by SafeSource Direct under any contract with Supplier. If you have additional questions about this Code, please contact your designated SafeSource Direct procurement representative.