



## **Supplier Code of Conduct**

Dear Business Partners,

Our company's success is driven by our commitment to providing our customers with quality products.

To achieve this, we must have a high-caliber workforce that continuously holds itself to the highest standards. Our high standards apply not only to our associates but extend to our Suppliers and their workers. Rich Products Corporation's Supplier Code of Conduct is designed to help us meet the highest ethical standards possible. It is the responsibility of our Suppliers to implement management systems that facilitate compliance with our Supplier Code of Conduct and the law, mitigate related operational risks, and facilitate continuous improvement.

Thank you for contributing to the legacy of integrity we enjoy at Rich's.

### **1. Purpose and Scope**

We believe a strong relationship with our Suppliers is the key to ensuring our company's success. The purpose of this Supplier Code of Conduct is to outline our expectations according to law and our company's core values and beliefs - ensuring consistent compliance from all of our Suppliers. This Supplier Code of Conduct aligns with international law, including the UN Bill of Rights and ILO Core Conventions. To the extent that any Supplier is subject to other written local standards or requirements relating to the subject matter of this Supplier Code of Conduct, the more stringent standards or requirements should be implemented.

This code applies to any company who provides ingredients, packaging, supplies or services to Rich Products Corporation or any of its subsidiaries or joint ventures. In the event Suppliers are authorized in writing to use subcontractors, Suppliers will be responsible for ensuring such subcontractors' compliance with this Code of Conduct. This code is not exhaustive; Suppliers are required to use their own discretion to ensure compliance with unaddressed topics. For additional information regarding our requirements, refer to our [Code of Responsible Business Practices](#)— *Do What's Right, No Matter What.*

## **2. Definitions**

“Associate” means all current and former workers of Rich Products Corporation.

“Supplier” means an institution, including its subcontractors, who provides goods or services to Rich Products Corporation.

“Rich Products Corporation” means Rich Products Corporation, and any entity that controls, is under common control with, or is controlled by Rich Products Corporation.

“Applicable Laws and Regulations” means all local, state, federal, and international laws and regulations, including but not limited to the labor and employment, health and safety, and environmental laws and regulations.

## **3. Supplier Requirements**

**Legal Compliance** - We require our Suppliers to fully comply with all laws, rules, and regulations applicable to their country of operation and locations where Rich Products Corporation is located. To the extent that any Supplier is subject to other written local standards or requirements relating to the subject matter of this Supplier Code of Conduct, the more stringent standards or requirements should be implemented. Where local law and this Supplier Code of Conduct conflict, this must be brought to the attention of Rich Products Corporation.

**Ethics** - We expect the highest standard of ethics, integrity, and responsibility in all our operations and endeavors. Suppliers are required to be ethical in all aspects of their business, practices, operations, and relationships, including, without limitation, honoring commercial and contractual obligations and managing through unforeseen events in an honest, timely, and transparent manner. We further expect our suppliers to align their operations with the Ethical Trade Initiative's (ETI) Base Code principles, including but not limited to freely chosen employment, freedom of association, safe working conditions, and no child labor. For more details, visit the [ETI Base Code webpage](#).

**Human Rights Commitment** - We expect all Suppliers to commit to human rights and honor the highest standard when applicable laws and regulations differ.

**Risk Assessment and Management** - We expect Suppliers to develop and maintain processes that identify risks in all areas addressed in this Code; assess the significance of each risk; and implement appropriate procedures and controls to minimize the identified risks.

**Performance Objectives with Implementation Plans and Measures** - We require Suppliers to develop and outline performance objectives and implementation plans, including assessments of performance against those specified objectives.

**Verification** - We require Suppliers to maintain documentation to verify compliance with the Supplier Code of Conduct and applicable laws and regulations.

We reserve the right to audit Suppliers at any time to ensure compliance with the standards in this Supplier Code of Conduct. Rich Products Corporation may monitor activities through on-site inspections, certifications, and third-party assessments. If permission to conduct an audit is denied, consequences up to or including termination of our agreement or business relationship may occur.

A condition of conducting business with Rich Products Corporation is compliance with this Supplier Code of Conduct. If a Supplier does not adhere to the Supplier Code of Conduct, they must promptly correct their actions to ensure compliance with the requirements outlined in this document. We reserve the right to terminate business with a Supplier who fails to adhere to the Supplier Code of Conduct.

#### **4. Business Integrity**

We hold all of our Suppliers to the highest ethical standards. Suppliers may not engage in bribery, embezzlement, extortion or other corrupt practices.

**Accuracy of Business Records** - We are committed to the integrity of our business records and ensuring that our books, records, and financial reporting are accurate and complete. We require Suppliers to maintain up-to-date business and financial books, records, and statements to demonstrate compliance with applicable laws and regulations. Upon Rich Products Corporation's request, these records must be made available.

**Disclosure of Information** - We expect Suppliers to accurately record and disclose information regarding their business activities, without falsification or misrepresentation, to all appropriate parties and as required by law.

**Fair Competition and Antitrust** - We require our Suppliers to conduct their business in full compliance with all applicable fair competition and antitrust laws and regulations in the jurisdictions in which they operate.

**Conflicts of Interest** - Suppliers may not engage in any activities that would create an actual or potential conflict of interest regarding their duties, interests, and obligations to Rich Products Corporation. We expect our Suppliers to immediately notify Rich Products Corporation if any conflicts of interest arise.

**Anti-Bribery/Anticorruption** -Where prohibited by law, Suppliers may not engage in any kind of bribery or kickbacks, including promising, offering, providing, or authorizing anything of value to a government official or political entity to gain an unfair business advantage. We expect Suppliers to be in full compliance with all applicable foreign and domestic anticorruption laws.

**Gifts and Entertainment** - Suppliers may not offer or accept anything of value from business partners to obtain unfair business advantages. Any gifts or entertainment must comply with applicable laws and regulations and must not violate Rich Products Corporation's policies on the matter as found in our [Code of Responsible Business Practices](#)– *Do What's Right, No Matter What*. "Gifts and entertainment" include anything of value, such as loans, prizes, meals, tickets, or gift certificates.

**Confidentiality/Privacy** - In order to conduct day-to-day business with Rich Products Corporation, Suppliers may need access to confidential/ private records. Suppliers must ensure this information is protected and remains confidential and abide by all applicable data privacy laws and regulations. Suppliers may not disclose this information unless given written permission from Rich Products Corporation. Suppliers must also comply with all relevant worker data privacy laws and may not disclose any protected information unless workers have given their informed prior consent in writing.

**Intellectual Property** - Suppliers must respect Rich Products Corporation's intellectual property rights, including processes, information, technology, and customer information. Suppliers are required to take all reasonable efforts and necessary precautions to safeguard their knowledge and protect intellectual property rights.

**Speaking Up / Whistleblower Protection and Anonymous Complaints** - Suppliers are expected to create and maintain an anonymous complaint system for managers and workers to report workplace complaints. Suppliers must protect whistleblower confidentiality and prohibit retaliation. Complaint systems must record, and track complaints and workers must be made aware of the progress or resolution of any raised complaint, even where this is not in their favor.

**Animal Wellness and Testing** - Suppliers are to ensure animals are treated respectfully and take a zero-tolerance stance on animal cruelty.

## **5. Workplace Standards**

Suppliers are required to follow all general workplace standards and must comply with all applicable laws and regulations, including those that relate to labor, wage, working hours, discriminatory hiring and employment practices, and health and safety. This commitment establishes and ensures a safe working environment for all workers.

The use of subcontractors must be authorized by Rich Products Corporation. Suppliers are responsible for educating and training subcontractors and ensuring subcontractors are compliant with the provisions of this Supplier Code of Conduct and the law.

**Nondiscrimination** - Suppliers must provide a fair, consistent, and inclusive environment and make all employment decisions based on neutral and objective criteria. Suppliers may not engage in or tolerate any discriminatory conduct against any person on any basis, including race, religion, gender, gender identity, sexual orientation, age, disability, genetics, nationality, veteran status, union membership, political opinion, social origin, or any other class protected by law.

**No Harassment**- All workers have a right to a workplace free of harassment and abuse. We require our Suppliers prohibit all types of harassment including, but not limited to, physical, verbal, non-verbal, psychological and sexual harassment.

**No Substance Abuse** - Suppliers must create and maintain a workplace free from the illegal use, possession, sale, or distribution of controlled substances.

**No Modern Slavery, Forced Labor, or Human Trafficking** – Rich Products Corporation has a zero-tolerance stance on Modern Slavery and Human Trafficking. All employment must be freely chosen, and all labor must be voluntary. Rich Products Corporation has a strict zero tolerance stance of employment of children/underage, slave, forced, bonded, indentured, or any form of illegal labor. Suppliers and associated sub-contractors shall not engage in or support the trafficking of human beings in any way. Suppliers must implement procedures to ensure they comply with the most stringent laws on slavery and human trafficking, regardless of location.

Suppliers must not engage in physical punishment, including when imposing discipline. Workers must be guaranteed their freedom of movement. Workers must be allowed to maintain control over their identity documents and must be free to leave their employer after a reasonable and lawful notice. Workers should not incur recruitment fees and where they do occur employers should seek to reimburse these.

**Terms of Employment** - Suppliers are expected to provide their workers an environment respectful of human dignity and workers' fundamental rights. Workers must not be subject to corporal punishment, physical, sexual, psychological, financial or verbal harassment or abuse in any form.

**Child Labor** - Suppliers must not use child labor. Suppliers must not employ any person younger than the applicable legal minimum age for working or fifteen years of age, whichever is greater. Children and young persons under eighteen must not be employed in hazardous conditions and Suppliers must comply with all relevant laws related to the employment of

children and young workers. To ensure compliance, Suppliers must create and maintain official and verifiable documentation of each of its workers' ages.

**Working Hours** - Suppliers must comply with all applicable laws, regulations and collective agreements regarding working hours, break periods, and overtime hours in any jurisdiction where the Supplier and Rich Products Corporation operates. Workers must be permitted to have reasonable days off and applicable leave of absence privileges.

All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

**Wages and Benefits** - Suppliers must pay workers in accordance with applicable wage laws, including minimum wages, overtime hours and mandated benefits in any jurisdiction where the Supplier and Rich Products Corporation operate. We encourage Suppliers to strive to pay a living wage to workers. Workers must not be expected to work additional hours to earn minimum wage for a day's work. Workers should be provided with a clear, written account of each pay period that reflects any wage deductions made in compliance with applicable laws.

**Freedom of Association and Union Association** - Suppliers must recognize, respect, and protect workers' lawful rights to freely associate and collectively bargain in accordance with applicable laws and regulations and without fear of retaliation. Where true freedom of association and union association cannot be exercised Suppliers should encourage alternative means to facilitate legitimate worker representation.

**Immigration** - Suppliers must comply with applicable immigration laws and regulations in any jurisdiction where they and Rich Products Corporation operate and only employ workers with a legal right to work in the relevant location. Suppliers should have procedures in place to demonstrate compliance. Suppliers should have access to documentation and periodically audit any employment agencies from which Suppliers obtain workers to monitor compliance.

## **6. Health and Safety Practices**

Suppliers must comply with all applicable safety and health laws and regulations in the countries in which they and Rich Products Corporation operate. Suppliers are expected to provide workers with a healthy and safe workplace, including access to clean restrooms, potable water, sanitary areas for food storage, adequate medical facilities, safety personal protective equipment, well-lit and workstations that are adequate.

**Occupational Safety** - Suppliers must protect workers from exposure to chemical, biological, and physical hazards, in addition to on-site accidents. Suppliers are expected to identify,

evaluate, and manage these occupational health and safety hazards. Workers must be provided with appropriate and adequately maintained personal protective equipment (PPE), free of charge.

**Emergency Prevention** - Suppliers must identify and assess potential emergency situations in the workplace. Suppliers must develop and implement emergency plans and response procedures, including but not limited to fire alarms, fire drills, exit facilities, fire detection and suppression equipment, and recovery plans to minimize harm to life and property. Suppliers must regularly test emergency preventative methods, such as fire alarms, to ensure that they are in working order.

**Infectious Disease Preparedness and Response** - Suppliers must develop, implement, and maintain a program to prepare for, prevent, and respond to the potential of an infectious disease outbreak among its workers.

**Incident Management** - Suppliers must create and maintain procedures to prevent, manage, track, and report worker safety incidents. Suppliers are expected to implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate workers' return to work.

## **7. Sustainability/Environmental**

Rich Products Corporation recognizes our responsibility to the environment and seek to operate sustainably. Suppliers are expected to apply a continuous improvement approach to enhance their environmental performance and reduce their environmental footprint. Rich Products Corporation encourages, and may require, Suppliers to better understand their environmental impact, seek to reduce their impact, and provide transparency through public reporting. Suppliers must follow all applicable laws and regulations regarding environmental practices.

**Regulated Substances** - Suppliers must have systems in place to identify, control, and disclose to Rich Products Corporation any regulated or hazardous chemicals being used, as well as confirming where such hazardous chemicals are being used. Suppliers should handle, store, transport, and dispose of chemicals and hazardous waste responsibly.

**Sustainable Materials** - Suppliers must responsibly source materials and components, seeking sustainable options where possible or where required. Rich Products Corporation has developed sustainability policies applicable to many products we sell. Suppliers should consult these policies to learn more about Rich's sustainable sourcing goals and expectations.

**Hazardous Waste** - Suppliers must create and maintain systems to ensure the safe handling, movement, storage, disposal, and management of hazardous materials. Suppliers are expected to train workers on how to handle hazardous material.

**Wastewater and Solid Waste Emissions** - Suppliers are expected to design and operate systems to properly manage wastewater, storm water, waste, and recyclable materials. Suppliers must monitor, treat, control, manage, and properly dispose of wastewater and solid waste. Suppliers must comply with all applicable waste management laws and regulations. Reducing, reusing, and recycling materials and waste should be pursued wherever possible.

**Air Emissions** - Suppliers must identify, manage, and reduce air emissions that pose a hazard to the environment. Suppliers are expected to conduct routine monitoring of the performance of its air emission control systems.

**Pollution Prevention** - Suppliers must strive to reduce consumption of resources, including raw materials, energy and water. Suppliers are expected to implement improvement plans for waste reduction, recycling, and energy conservation policies and seek ways to use cleaner sources of energy.

**Permits and Reporting** - Suppliers must obtain and maintain all required environmental permits. Suppliers must comply with the reporting requirements of applicable permits and regulations.

#### **8. Speak Up.**

If a worker sees or suspects any conduct or business practice that could violate this Supplier Code of Conduct, please contact Rich Products Corporation immediately via our [Global Ethics Hotline](#) +1.800.461.9330.