



CSafe Supplier Code of Conduct

Introduction

CSafe is committed to conducting its business in an ethical, legal, and socially responsible manner. CSafe engages with its suppliers to share this commitment and, therefore, has established this CSafe Supplier Code of Conduct (“Code”). Although there may be different legal and cultural environments applicable to its suppliers, CSafe suppliers must comply with the Code in order to do business with CSafe or any of its affiliates.

1. Compliance Laws
2. Labor Standards
3. Environment
4. Health & Safety
5. Ethics and Regulatory Compliance
6. Fiscal Responsibility
7. Management Systems
8. Monitoring and Enforcement



1. Compliance with Laws

Suppliers providing products or services to CSafe shall operate in full compliance with the laws of their respective countries and with other applicable laws, rules and regulations. Suppliers shall operate in full compliance with laws relating to labor, worker health and safety, and environmental regulations.

While CSafe Suppliers are expected to self-monitor and demonstrate their compliance with the Code, CSafe may audit Suppliers or inspect Suppliers' facilities with advanced notice to confirm compliance.

2. Labor Standards

Child Labor

Suppliers shall employ only workers who meet the applicable minimum legal age requirement and avoid child labor. The term "child" refers to any person under the age of 15 (or 14 according to applicable local law), any person under the minimum age for completion of compulsory education or any person under the minimum age for employment in any specific country. Suppliers shall maintain official documentation verifying each worker's date of birth. Employees under the age of 18 should not perform hazardous work. Suppliers shall comply with all applicable child labor laws, including those related to hiring, wages, hours worked, overtime and working conditions.

Forced Labor & Slavery

All Suppliers, including recruiters, employment agencies, sub-agencies, and recruitment firms, are prohibited from using forced labor and prison labor and human trafficking. All forms of forced labor are prohibited, including indentured labor, bonded labor (including debt bondage, trafficked or slave) or any other form of forced labor. All forms of involuntary prison labor are also prohibited. Support for or engagement in any form of human trafficking or involuntary labor through threat, force, fraudulent claims, or other coercion is prohibited. Suppliers must also ensure slavery and human trafficking are not part of their respective businesses and supply chains.

Recruitment & Related Fees

Workers must not be required to pay recruitment, hiring, agents' or brokers' fees, or other related fees or costs for their employment. Suppliers should recruit workers in a manner that prevents worker-paid fees. Suppliers may not require workers to make any financial deposits into accounts. These Standards also apply to third-party labor agents or brokers. Suppliers are required to analyze and monitor the practices of recruitment agencies and labor brokers and employ agencies that act ethically and in the best interests of workers when contracting labor.

Non-Discrimination & Non-Harassment

Suppliers must commit to a workforce and workplace free of harassment, unlawful discrimination, and retaliation. Suppliers must provide equal opportunity in the workplace and reasonable accommodation, and not engage in harassment or discrimination in employment on the basis of age, ancestry, citizenship, color, family or medical care leave, gender identity or expression, genetic information, immigration status, marital or family status, medical condition, national origin, physical or mental disability, political affiliation, union membership, protected veteran status, race, religion, sex (including pregnancy), sexual orientation, or any other characteristic protected by applicable local laws, regulations and ordinances. Suppliers must accommodate all disabilities to the extent required by law.



Humane Treatment

Suppliers must not engage in any harsh or inhumane treatment, including violence, gender-based violence, sexual or other harassment including psychological harassments or threats, sexual abuse, corporal punishment, mental or physical coercion, bullying, or public shaming. Verbal abuse or other forms of intimidation are prohibited.

Working Hours and Compensation

Suppliers shall set working hours in compliance with all applicable laws. Workers must be paid at least a minimum legal wage or a wage that meets local industry standards (so long as it is greater than the applicable minimum legal wage) and such wage shall ensure an adequate standard of living. When overtime is required, suppliers should conduct operations in ways that limit overtime to a level that ensures humane and productive working conditions. Suppliers shall pay employees in a timely manner. All employees and workers shall be provided with a clear, timely, and understandable wage statement that includes sufficient information to verify accurate compensation for work performed.

3. Environment

Suppliers shall comply with all applicable environmental laws and regulations including those which regulate hazardous material, air and water emissions, and waste.

Waste and Emissions

Suppliers shall have systems in place to ensure the safe handling, movement, storage, recycling, reuse, or management of waste, air emissions and wastewater discharges. Any of these activities which have the potential to adversely impact human or environmental health shall be appropriately managed, measured, controlled, and treated prior to release of any substance into the environment. Suppliers shall have systems in place to prevent or mitigate accidental spills and/or releases into the environment.

Resource Conservation and Climate Protection

Suppliers are expected to use natural resources (e.g., water, sources of energy and raw materials) in an economical way. Negative impacts on the environment and climate should be minimized or eliminated at their source or through practices such as the modification of production, maintenance and facility processes, materials substitution, conservation, recycling, and material reutilization. Suppliers must respect the legal land rights of individuals, indigenous people, and local communities, inclusive of their established public, private, communal, collective, indigenous, and customary rights over natural resources (e.g., fisheries, forests, and water).

4. Health & Safety

Suppliers shall provide employees with a safe and healthy working environment.

Health & Safety

Suppliers are required to provide workers with a safe and healthy work environment that avoids harm to workers' physical and mental health. Suppliers must comply with applicable laws regarding occupational safety, working conditions, and health standards. Where required by law, CSafe requires that Suppliers facilitate worker health and safety committees, post health and safety information in a location and language accessible to workers.



Safe Working Conditions

Suppliers must maintain safe working conditions, including by providing safe Supplier-controlled facilities, facility infrastructure, and machines. Facilities and Supplier-controlled worker environments must meet all legal requirements. We require that Suppliers monitor workers' potential for exposure to health and safety hazards (e.g., chemical, biological, mechanical, electrical and other energy sources; physical agents; fire; vehicles; fall hazards). Suppliers are required to identify, assess, and mitigate these hazards using best practices. Suppliers are required to provide workers with appropriate, well-maintained, personal protective equipment free of charge, together with training on when and how to use the equipment correctly. Workers who work with (or are otherwise exposed to) hazardous or dangerous conditions or materials must be informed of risks to them associated with these hazards and receive appropriate training in advance and on a continual basis.

Occupational Injuries & Illnesses

Suppliers are required to put procedures and systems in place to prevent, manage, and track occupational injuries and illnesses; encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases; implement corrective actions to eliminate their causes; and facilitate the return of workers to work.

Emergency Preparedness and Response

Suppliers are required to identify and plan for emergency situations by implementing response systems and emergency plans and training their workers on them at least annually. Response systems and emergency plans to include emergency reporting; alarm systems; worker notification and evacuation procedures; first-aid supplies; fire detection and suppression equipment; unblocked, unobstructed, and unlocked exit facilities.

Machine Safeguarding

Suppliers are required to implement a regular machinery maintenance program. Production and other machinery must be routinely evaluated for safety hazards. Where appropriate, Suppliers are required to provide properly maintained machinery controls (e.g., physical guards, interlocks, barriers) when machinery presents an injury hazard to workers.

5. Ethics & Regulatory Compliance

Suppliers shall conduct their business in accordance with the highest standard of ethical behavior and in accordance with applicable laws and regulations.

Business Integrity

Suppliers shall not engage in or permit any form of corruption, extortion, or embezzlement. Suppliers shall not offer bribes or other unlawful incentives to anyone. Suppliers shall conduct business competitively and in full compliance with all applicable laws, codes and regulations. Suppliers are expected not to give or offer CSafe employees gifts beyond a nominal value or any other personal benefit. Entertainment and meals should be modest, infrequent, and occur in the normal course of business. Suppliers that develop (or contribute to developing), train, or use artificial intelligence (AI) must do so according to legal requirements and should strive to follow best practices for responsible AI.



Conflict of Interest

CSafe, along with its suppliers, is expected to use good judgment and to avoid situations that can lead even to the appearance of a conflict that may undermine the trust that others place in CSafe.

Suppliers that do business with CSafe shall not have any competing interest that may interfere with their ability to make objective decisions to act in the best interest of CSafe. Good judgment is expected as well as avoiding the appearance of a conflict of interest.

All suppliers shall notify CSafe immediately in the event of a potential or actual conflict of interest.

Whistleblower Protections

Suppliers must protect worker whistleblower confidentiality and prohibit retaliation against worker whistleblowers, who in good faith report improper conduct (for example, related to environmental or human rights violations, workplace grievances, and unethical business practices) by a Supplier or an employee or officer of a Supplier.

Fair Competition

Suppliers shall conduct their business in full compliance with applicable anti-trust and fair competition laws, and disclose information regarding business activities, structure, financial situation, and performance in accordance with applicable laws.

Privacy & Intellectual Property

Suppliers shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Supplier shall comply with applicable privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

Suppliers shall respect the intellectual property rights of others, including CSafe and its affiliates and business partners. Supplier must take appropriate steps to safeguard and maintain confidential and proprietary information of CSafe and use such information only for the purposes specified by CSafe. Suppliers shall observe and respect all CSafe's patents, trademarks and copyrights and comply with all requirements as to their use as established by CSafe.

Business Continuity

Ensure maintenance of a measurable documented emergency response and disaster recovery plan to provide protection of data and intellectual property and the business continuity of the services and/or goods being provided to CSafe. The plan must include implementation procedures and at a minimum continuity and recovery plans for: weather or other natural disaster, labor or other resource constraints, system and/or facilities outage or unavailability, power outage, and telecommunication outage.

Identification of Concerns

Suppliers shall provide means for their employees to report concerns or potentially unlawful activities in the workplace. Any report should be treated in a confidential manner. Suppliers shall investigate such reports and take corrective action if needed. Suppliers shall not retaliate against or harass any employee making a good faith report.



Conflict Minerals

Suppliers shall not include, in any product or raw material provided to CSafe, any tantalum, tin, tungsten, or gold mined in Angola, Burundi, the Central African Republic, Democratic Republic of the Congo, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia that contribute to armed conflict or human rights abuses. Upon request, Suppliers shall provide country of origin information for these minerals.

Critical Raw Materials

Upon request, Suppliers shall provide country of origin information for raw materials used in the manufacture or assembly of CSafe products.

6. Fiscal Responsibility

Suppliers shall keep accurate and complete financial and operational records as well as maintain a system of effective internal controls. Suppliers that are public shall comply with applicable insider trading laws.

7. Management Systems

Suppliers shall use management systems to facilitate continual improvement and compliance with the expectations of this Supplier Code. The management system elements include:

Commitment and Accountability

Suppliers should have designated representatives responsible for implementing management systems and programs that oversee compliance with applicable laws. Senior management must routinely review and assess the quality and efficiency of the management systems and programs.

Documentation

Suppliers shall maintain documentation necessary to demonstrate conformance with these expectations and compliance with applicable regulations.

Training and Competency

Suppliers shall have a training program that achieves an appropriate level of knowledge, skill and ability in management and workers to address these expectations.

Continual improvement

Suppliers are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections and management reviews.

Communication

Suppliers shall maintain open and direct communication with appropriate CSafe business functions, including CSafe Procurement and Supplier Management.



8. Monitoring & Enforcement

In order to do business with CSafe, Suppliers shall abide by the Code and all applicable laws. Suppliers should ensure their organization, as well as any subcontractors producing products for CSafe, are in compliance with the Code.

If CSafe determines that any Supplier has violated the Code, CSafe may, at its discretion, terminate the business relationship and/or require the Supplier to implement corrective actions. If corrective actions are advised but not taken, CSafe may terminate current orders and may suspend placement of future orders.

CSafe encourages Suppliers to define and implement policies for social accountability and to establish their own internal compliance management systems.

Contact us at: legal@csafeglobal.com or purchasing@csafeglobal.com

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