



SUPPLIER CODE OF CONDUCT

- **COMPLIANCE WITH LAW:** Suppliers are required to adopt and adhere to employment rules and conditions that respect workers, ensuring, at a minimum, the protection of their rights under both national and international labor and social security laws and regulations.

Suppliers must comply with all applicable export and import laws, customs duties, and all other laws related to their international business activities.

- **CHILD LABOR:** Suppliers must not directly or indirectly employ workers under the age of 15 years or the age of completion of compulsory education, whichever is higher.
- **FORCED LABOR:** Suppliers will not source materials or work with manufacturers that use any forced or involuntary labor, whether imprisoned, bonded, trafficked, indentured, or otherwise.
- **WAGES AND BENEFITS:** All Suppliers must pay at least the minimum wage or the pertinent prevailing wage, whichever is higher, and comply with all legal requirements related to salaries and benefits.
- **WORKING HOURS:** Supplier must comply with all applicable laws and regulations related to working hours, including but not limited to overtime, maximum hours, rest days, and holidays. Suppliers shall compensate workers for all overtime work at a premium rate in accordance with the law.
- **FREEDOM OF ASSOCIATION:** Suppliers must respect the workers' rights to freely associate and comply with existing local laws without intimidation, reprisal, or harassment.
- **NON-DISCRIMINATION:** Suppliers will not discriminate in their hiring and employment practices, including compensation, advancement, discipline, termination, retirement, or other based on race, ethnic origin, national origin, religion, age, marital status, capacity to bear children, pregnancy, HIV or any other medical status, sexual orientation, gender, political opinion, social status, legal migrant worker status, disability, or other legally protected category.
- **ABUSE AND HARASSMENT:** Suppliers must treat their workers respectfully and with dignity. Supplier will not use corporal punishment, threats, or other forms of unlawful, physical, psychological, sexual, or verbal harassment or abuse or coercion, whether mental or physical. All our suppliers must implement a non-retaliation policy that allows workers to express their concerns about workplace conditions freely.
- **HEALTH AND SAFETY:** Suppliers must adhere to all applicable health and safety laws and regulations, ensuring a secure and healthy workplace to prevent accidents and protect the well-being of employees. This pertains to incidents arising out of, linked with, or occurring during work or because of the operation at employers' facilities.
- **ENVIRONMENT:** Suppliers must strive to minimize the adverse environmental impacts of their operations. This includes conserving natural resources, reducing energy consumption, lowering gas emissions, and lowering water use through sustainable practices.

- **GIFTS AND IMPROPER PAYMENTS:** Suppliers must not engage in corruption, extortion, or embezzlement and must fully comply with all applicable local and international anti-corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act, the OECD Anti-Bribery Convention, and any other relevant international anti-corruption agreements.

Suppliers are strictly prohibited from offering or accepting bribes or using any means to gain an improper advantage. This includes prohibiting facilitating payments, kickbacks, or similar payments to government officials, CarbonFree employees, or agents acting on CarbonFree's behalf. CarbonFree employees are also discouraged from accepting gifts or entertainment of more than minimal value from suppliers. While business meals and entertainment may be appropriate to support professional relationships, these expenses must remain reasonable and not extravagant.

- **INTELLECTUAL PROPERTY RIGHTS:** Suppliers must respect and refrain from violating the intellectual property rights of others, including patents, copyrights, trademarks, and other proprietary rights.
- **FAIR DEALINGS AND COMPETITION LAWS:** Suppliers must not unfairly take advantage of any worker through manipulation, hiding, abuse, misrepresentation of material facts, or any other unfair dealing. Suppliers must also not engage in collusive bidding, price discrimination, price fixing, or other unfair trade practices that violate applicable antitrust and competition laws. Suppliers will always maintain fair business standards in their advertising, sales, and competition processes.
- **CONFIDENTIALITY:** Suppliers must protect the Confidential Information shared by CarbonFree, its affiliates, customers, or suppliers. Confidential information may only be used and disclosed according to the manner authorized by CarbonFree. Confidential information includes any business information about CarbonFree, its customers, or suppliers not generally known to the public.
- **CONFLICT MINERALS:** CarbonFree is committed to complying with federal laws and regulations regarding the disclosure of conflict minerals and expects suppliers to share this commitment. Suppliers must determine if their products contain conflict minerals such as tin, tantalum, tungsten, gold, or any material designated by the Securities and Exchange Commission. Suppliers shall take necessary actions and provide any information CarbonFree might request to ensure compliance with Conflict of Minerals laws, rules, and regulations.
- **DOCUMENTATION AND MONITORING:** Suppliers must establish a process of ensuring compliance with the CarbonFree Supplier Code of Conduct. The supplier must retain all documentation to prove compliance with this code and, upon CarbonFree's request, provide CarbonFree access to such documentation. The supplier must allow access to CarbonFree's representatives to conduct on-site inspections of manufacturing facilities, review records relating to employment matters, and conduct private interviews with employees, etc.
- **REPORTING:** CarbonFree encourages reporting of any actual or suspected violations of the Supplier Code of Conduct, either directly or through CarbonFree's anonymous helpline, available at: report.easylama.com/carbonfree-chemicals-fup. CarbonFree takes all compliance concerns seriously, will investigate all reports of actual or suspected violations of the Supplier Code of Conduct and will not tolerate retaliation against individuals reporting in good faith. In the event of any illegal or unethical behavior, or violations of the Supplier Code of Conduct, CarbonFree reserves the right in its sole discretion to take appropriate actions, up to and including the possibility of contract termination. To the extent allowable by law, the existence and details of any investigation will be kept confidential and shared only with individuals with a need to know.