



## **CJK Group Supplier Code of Conduct**

### **Purpose and Scope**

CJK Group is focused on developing successful long-term relationships with our employees, clients, and supplier partners. Our relationship with suppliers is driven by three of our core values. Specifically, our focus on Integrity, Cost Consciousness, and Growth drives our relationship with our suppliers. Our expectation is that our partners reflect these core values and adhere to our Supplier Code of Conduct ("Supplier Code") at all times and in all situations.

The Supplier Code sets forth our requirements in the areas of business integrity, labor practices, health and safety, and environmental sustainability. Suppliers, vendors, contractors, consultants, agents, and other providers of goods and services who do business with CJK Group entities (collectively hereafter referred to as "Supplier" or "Suppliers") are required to follow the Supplier Code. Failure to comply with the Supplier Code may result in the termination of CJK Group's relationship with a Supplier.

#### **1. Comply with Applicable Laws.**

Suppliers must not tolerate, permit, or engage in bribery, embezzlement, extortion, kickbacks, or other forms of corruption in dealings with any government official or employee or any individual in the private sector. Suppliers will comply with all applicable local, national, and international laws, regulations, treaties, and industry standards, including, without limitation, those pertaining to export and trade controls and the manufacture, pricing, sale and distribution, and safety of the relevant products and/or services.

In the event that the requirements of this Code of Conduct are stricter than applicable local, national, or international law, Supplier will comply with this Code. However, if there is any conflict between the requirements of this Code of Conduct and the requirements of any applicable local, national, or international law, Supplier is to comply with the local, national, or international law. Supplier will notify CJK Group in writing of any such conflicts.

#### **2. Engage in Free and Fair Competition.**

A free and fair market ensures that CJK Group delivers the best quality products at the best value. Suppliers must not engage in activities that illegally restrain free and fair competition, such as price fixing, bid rigging, or market division.

#### **3. Conduct Business with Integrity, Free of Corruption.**

Suppliers must not sacrifice integrity to get business or business advantages - no matter the size or benefit to the Supplier or CJK Group. Suppliers must not give or receive bribes or kickbacks of any kind, obtain business through extortion or other corrupt methods or engage in transactions involving proceeds derived from unlawful activities.



If Supplier is aware of anyone soliciting or accepting a bribe, kickback, or anything of value with respect to CJK Group's business or other corrupt activity, Supplier must immediately notify CJK Group's Compliance Department.

#### **4. Protect Confidentiality.**

Suppliers with access to confidential information must not disclose such information to any other company or person without advanced written consent from CJK Group's Global Procurement Department. Confidential information includes, but is not limited to:

- Product specifications
- Product content
- Account information
- CJK Group's brand or sub-brands (logo, name, and tag line) in Supplier advertisements or references, this includes written, electronic, visual, or verbal communication.

Supplier procedures must be in place to ensure that confidential information is protected against unauthorized disclosure and theft.

#### **5. Comply with All Export and Import Laws.**

Supplier must strictly adhere to import/export laws, trade controls, and trade compliance rules and regulations, regardless of where they are located, even if outside the United States. These include, but are not limited to, government-imposed export controls, trade sanctions and boycotts that place restrictions on the exports of certain items to particular destinations or parties or for specific end uses; anti-boycott laws that prohibit companies from participating in or cooperating with an international boycott that is not sanctioned by the United States; and laws mandating the proper classification of products for import or export.

#### **6. Encourage a Diverse Workforce and Provide a Workplace Free from Discrimination, Harassment, Retaliation and Any Other Form of Abuse.**

CJK Group expects its Suppliers to provide and foster a diverse and inclusive workplace. Suppliers shall conduct their workplace and business activities free from discrimination or harassment based on race, color, creed, religion, national origin, age, sex, sexual orientation, gender identity or expression, marital status, physical or mental disability, military or veteran status, genetic information, or any other category protected by applicable federal, state, or local law. Suppliers shall treat business partners and employees with respect and dignity, without regard to any protected category.

#### **7. Treat Employees Fairly, Including with Respect to Wages, Working Hours and Benefits.**

Suppliers shall comply with all applicable legal and regulatory requirements relating to working hours, wages and benefits, including, but not limited to those pertaining to minimum wage, overtime, maximum working hours, rest and meal breaks, and time and recordkeeping.



#### **8. Prohibit All Forms of Forced or Compulsory Labor.**

CJK Group prohibits forced and compulsory labor and human trafficking and will not do business with any Supplier that supports or engages in slavery or human trafficking in any part of its supply chain. Suppliers shall not use physical punishment or threats of violence or confiscate identity, immigration, or work authorization documents as a method of discipline or control.

#### **9. Prohibit the Use of Child Labor.**

Suppliers shall adhere to minimum employment age limits required by applicable laws and regulations. In no instance shall a Supplier permit children to perform work that exposes them to undue physical risks.

#### **10. Respect Employees' Right to Freedom of Association and Collective Bargaining, Consistent with Local Laws.**

Consistent with applicable law, Suppliers shall respect employees' rights to join or refrain from joining associations and worker organizations.

#### **11. Provide Safe and Healthy Working Conditions.**

Suppliers will provide employees with a safe and healthy workplace in compliance with all applicable laws and regulations, ensuring, at a minimum, reasonable access to potable water and sanitary facilities, fire safety, and adequate lighting and ventilation.

#### **12. Carry Out Operations with Care for the Environment and Comply with All Applicable Environmental Laws and Regulations.**

Suppliers must comply with all applicable environmental laws and regulations and abide by these principles as written in the CJK Environmental Policy Statement:

1. Prevent pollution whenever possible;
2. Train employees on environmental programs and empower them to contribute and participate;
3. Communicate your environmental commitment and efforts to your customers, staff, and your community; and
4. Continually improve over time by striving to measure your environmental impacts and by setting goals to reduce these impacts each year.

To comply with these requirements, Suppliers must have a sustainability system in place that is documented, shows improvements, and is auditable. Suppliers should include the following practices in their sustainability systems:



- Source materials from responsible distributors that are certified with at least one certification from an independent third-party verification.
- Make ongoing efforts to reduce your carbon footprint, reuse energy and resources, utilize renewable energy sourcing, minimize waste and water consumption during the manufacturing process, and recycle 100% of scraps, trash, equipment, and solvents whenever possible.
- Work to identify potential environmental risks and implement appropriate means to control such risks; including those related to proper chemical management, and air and water quality.
- Make efforts to educate your employees, customers, and suppliers about environmental issues relevant to the industry.
- Empower employees to take responsibility for awareness and control of environmental issues relating to their specific jobs.

### **13. Deliver Products and Services Meeting Applicable Quality and Safety Standards.**

CJK Group is committed to producing high quality and safe products across all our brands. Suppliers involved in any aspect of developing, handling, packaging, or storing our products are expected to:

- Know and comply with the product quality standards, policies, specifications, and procedures that apply to the products produced at your location;
- Follow and adhere to good manufacturing practices and testing protocols;
- Report issues immediately to CJK Group that could negatively affect the quality or public perception of a CJK Group product; and
- Provide Safety Data Sheets (SDS) upon request.

### **14. Support Compliance with the Supplier Code.**

Suppliers must establish appropriate management processes and cooperate with reasonable assessment processes requested by CJK Group. To conduct business with CJK Group, Suppliers must enter into contracts and execute purchase orders that mandate compliance with the Supplier Code. With prior notice, CJK Group may conduct reasonable audits to verify Supplier's compliance with the Supplier Code.

CJK Group expects Suppliers to act responsibly in all respects and to ensure that no abusive, exploitative, or illegal conditions exist in their supply chains. Suppliers must also require that their subcontractors and vendors abide by the requirements and values as set out in the Supplier Code.

### **15. Report suspected violations**

Suppliers shall report suspected violations of the Supplier Code of Conduct to CJK Group Director of Procurement at 330-541-1043 or by emailing [procurementdirector@cjkgroup.com](mailto:procurementdirector@cjkgroup.com).

Suppliers shall not retaliate or take disciplinary action against any worker who has, in good faith, reported violations or questionable behavior, or who has sought advice regarding this Code of Conduct.