

Supplier Code of Conduct

1. Labour and Human Rights

1.1. Human Rights

Cooper Turner Beck suppliers will uphold the human rights of employees and treat them with respect and dignity as understood by the international community. Cooper Turner Beck suppliers are encouraged to develop lawful workplace apprenticeship programs for the educational benefit of their community, provided that all participants meet the minimum age requirements.

1.2 Forced Labour

Cooper Turner Beck suppliers are prohibited from using slave or involuntary labour of any kind such as prison labour, indentured labour, or otherwise. This includes the transportation, harbouring, recruitment, transfer or receipt of persons by means of threat, force, coercion (such as withholding passports or travel documentation), abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

1.3. Child Labour

Cooper Turner Beck suppliers will ensure that their hiring practices comply with applicable laws and regulations and meet international best practices and standards. Only workers who meet the applicable minimum legal age requirement in the country where they are working, may be hired by a Cooper Turner Beck supplier. Workers under the age of 18 must not perform hazardous work and should be restricted night work if it interferes with educational needs. Internships that are a part of a development program for young people may be an exception to the age requirements, if allowed by local law.

1.4. Anti-discrimination

Cooper Turner Beck suppliers shall not subject any person to discrimination (including hiring, salary, benefits, advancement, discipline, termination, or retirement) based on gender, race, religion, age, disability, sexual orientation, nationality, political opinion, marital status, maternity, medical condition, or social or ethnic origin. Cooper Turner Beck believes in diversity and inclusion and bringing together people of different races, gender, education, language, viewpoints, and skill sets and experience enables ideas and innovation to flourish and expects its supply chain to uphold these values as well.

1.5. Harassment and Abuse

Cooper Turner Beck suppliers shall treat every employee with respect and dignity and shall not allow any employee to be subject of physical, sexual, psychological, or verbal harassment or abuse.

1.6. Wages and Benefits

Cooper Turner Beck suppliers will meet all applicable wages and benefits regulations, at a minimum. In any event, wages and benefits should be enough to meet basic needs. For each pay period, the



supplier will provide workers with an understandable wage statement that includes sufficient information to verify accurate compensation for work performed.

1.7. Fair working hours

While it is understood that overtime is often required, Cooper Turner Beck suppliers will manage operations in compliance with the law (local) and ensure that overtime does not exceed levels that create inhumane working conditions. Workers will also be compensated for overtime hours.

1.8. Freedom of Association and Collective Bargaining

Cooper Turner Beck suppliers will recognise the right of workers to join or refrain from joining associations of their own choosing and the right to collective bargaining, unless otherwise prohibited by law. In all cases, worker rights to open communication, direct engagement, and humane and equitable treatment must be respected.

1.9. Compliance requirements

Cooper Turner Beck suppliers agree that any work performed by subcontractors at suppliers' facilities will be treated in the same manner and consistent with the principles set forth in this Supplier Code of Conduct.

2. Health and Safety

2.1. Healthy and Safe Working Conditions

Cooper Turner Beck suppliers shall comply with applicable environmental laws and regulations and provide a safe and healthy work environment to prevent accidents and injury to health occurring within or arising out of the course of work, or as a result of the operation of employer facilities.

2.2. Compliance Requirements:

- Know and comply with all applicable health and safety regulations.
- Provide all required training for employees, contractors and others and ensure the effectiveness of such training in a timely manner.
- Set appropriate safety procedures to avoid injuries and any unsafe working conditions.
- Provide the necessary personal protective equipment to the suppliers' workforce.
- Track and report occupational injuries and illnesses.

3. Environment

3.1. Environmental sustainability

Cooper Turner Beck shall comply with all applicable health, safety and environmental laws and regulations when conducting business. By way of example, suppliers shall:

- Obtain and keep all current required environmental permits and registrations.
- Reduce, control and/or eliminate wastewater, waste and pollution at the source
- Reduce, control and/or eliminate air emissions of volatile chemicals, corrosives and combustion products. Ensure that their products comply with applicable labelling requirements.
- Identify, manage, store, move and handle hazardous substances in accordance with all applicable laws.

- Keep all records related to the environmental laws and regulations that you are required to retain to comply with local law in the countries you operate.

4. Ethics

4.1. Anti-corruption

Suppliers will conduct their businesses without engaging in corrupt practices, including public or private bribery or kickbacks. Suppliers will maintain integrity, transparency and accuracy in corporate record keeping. In the event that a Cooper Turner Beck employee solicits or requests a kickback, personal favour (loans, jobs for family members etc.), suppliers will contact a company representative to report the request, even if they declined to offer or pay a kickback.

4.2. Gifts, Entertainment and Offers of Hospitality

Cooper Turner Beck does not prohibit suppliers from providing any gift or offer of hospitality to Cooper Turner Beck employees or contractors if it is made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of a business or a business advantage, or in explicit or implicit exchange for favours or benefits. Further, any gifts or hospitality must:

- Comply with local law and be given in our name, not in your name.
- Not include cash or a cash equivalent (such as gift certificates or vouchers).
- Be appropriate for the circumstances.
- Be given openly, not secretly.

4.3. No Unfair Business Practices

Cooper Turner Beck suppliers will act with integrity and lawfully in the proper handling of competitive data, proprietary information and other intellectual property, and comply with legal requirements regarding fair competition, antitrust, and accurate and truthful marketing.

4.4. Avoiding Conflicts of Interest

Cooper Turner Beck suppliers must do business in a way that is open, transparent and with the highest integrity. Suppliers are required to disclose any situation that might create a conflict of interest and harm the business relationship. Some common examples of conflicts of interest are situations here a supplier's employee is related to a member of the Cooper Turner Beck workforce. It can include a Cooper Turner Beck employee (or family member) having a financial interest in a Cooper Turner Beck supplier.

4.5. Compliance Requirements:

- Promptly notify Cooper Turner Beck if you become aware of any improper business courtesy provided to one of our employees and vice versa.
- Promptly notify Cooper Turner Beck if you become aware of any relationship that could appear to be a potential conflict of interest.
- Promptly notify Cooper Turner Beck of any illegal boycotts or any other type of coercive behaviour that might harm the business relationship.

5. Personal Data, Confidential Information, and Security Measures

5.1. Privacy and Information Security

Cooper Turner Beck suppliers must comply with applicable laws, rules, and regulations or the jurisdictions in which they operate regarding privacy and information security. In addition, they must:

- Use information obtained through their relationship with Cooper Turner Beck only for the purpose defined to them.
- Store information as agreed with Cooper Turner Beck and ensure that they have and continue to have in place appropriate information security policies and procedures to secure access to Cooper Turner Beck information and notify Cooper Turner Beck promptly of actual or suspected security privacy breaches, security breaches, or losses of Cooper Turner Beck information.

5.2. Compliance Requirements

- Do not print or download confidential Cooper Turner Beck documents without permission from a Cooper Turner Beck contract manager or the appropriate document owner.
- No Cooper Turner Beck confidential information should be stored in USB drives, nor should it be transmitted using unsecure methods.
- In order to protect Cooper Turner Beck confidential information, use the watermarks 'restricted confidential', 'confidential', 'Internal Use Only' or, if applicable, 'Public Information'.
- If you are handling Cooper Turner Beck private employee, supplier, or customer data, you will ensure that you have information security safeguards in place to protect that information to the extent of applicable data privacy laws.
- In the event of a suspected or actual data privacy breach, you will notify Cooper Turner Beck immediately.

6. Management Systems

6.1. Compliance Requirements:

- Cooper Turner Beck suppliers shall adopt or have a management system designed to ensure:
- Compliance with applicable laws, regulations and customer requirements related to suppliers' operations and products.
- Conformance with this Supplier Code of Conduct.
- Identification and mitigation of operational risks related to the areas covered by this code.
- The management systems should also drive continual improvement.
- Management systems to manage and incentivise positive social and environmental performance.

7. Conflict Minerals

7.1. Cooper Turner Beck Conflict of Minerals policy

Cooper Turner Beck suppliers are expected to supply materials which are 'CAHRAs Conflict Free' from the countries defined in the below hyperlink. Suppliers are expected to adopt policies and management systems with respect to conflict minerals and to require their own suppliers to adopt



similar policies and systems. Cooper Turner Beck expects suppliers to establish their own due diligence program to ensure conflict-free supply chains.

If Cooper Turner Beck determines that a supplier's efforts to comply with this policy have been deficient and the supplier fails to co-operate in developing and implementing reasonable remedial steps, Cooper Turner Beck reserves the right to take appropriate actions up to and including discontinuing purchases from the supplier.

[CAHRAs](#)

8. Monitoring and Compliance

8.1. Monitoring

To ensure compliance with our Supplier Code of Conduct, Cooper Turner Beck shall have the right to monitor suppliers through audits and third parties and visits by Cooper Turner Beck personnel. Select suppliers shall be subject to ongoing monitoring during the relationship.

8.2. Compliance

We seek relationships with suppliers that are committed to manufacturing Cooper Turner Beck products under fair and safe labour conditions and sound ethical and environmental practices. If we determine that a supplier does not comply with this Code of Conduct, we typically strive to work with the supplier to develop and implement an appropriate corrective action plan. Nevertheless, depending upon the nature of the non-compliance, Cooper Turner Beck reserves the right to terminate its relationship with a supplier that produces and/or delivers Cooper Turner Beck products at any time for failing to adhere to our Supplier Code of Conduct.

9. Reporting Concerns

- If you become aware of a situation that may include a violation of this Supplier Code of Conduct, you have a responsibility to report it to Cooper Turner Beck. Cooper Turner Beck will treat all reports confidentially to the extent possible, consistent with the applicable law and Cooper Turner Beck policies. A thorough investigation may be needed, and suppliers will be expected to assist Cooper Turner Beck in these reviews by sharing information or providing access to the relevant data. All reports will be investigated promptly and thoroughly.
- You can make a report by reaching out to your Cooper Turner Beck point of contact, another Cooper Turner Beck employee in a position of authority, or by emailing details to supplierCofC@cooperturnerbeck.com

As a supplier of Cooper Turner Beck, I confirm that our business operations will be conducted in accordance with the requirements set out in this Code of Conduct.

Company Name: _____

Signed by: _____

Date: _____

Signature: _____