

## SUPPLIER CODE OF CONDUCT

### INTRODUCTION.

Canary is committed to providing value to our clients – while also being a powerful force for good. Business integrity, responsible product sourcing, and the safety and wellbeing of workers across the global supply chain are of paramount importance to Canary. Our commitment to operating with high ethical standards and making a positive difference in everything we do is what makes Canary special.

These principles apply to all aspects of Canary's business, and encompass all manufacturers, subcontractors, service providers, vendors, and other suppliers (each a "Supplier" and collectively "Suppliers") that supply the products that Canary provides to its clients.

These principles are reflected in this Code of Conduct ("**Code of Conduct**"), which establishes the minimum standards that must be met by any Supplier that sells goods to or does business with Canary, regarding:

- Supplier's treatment of worker;
- workplace safety;
- the impact of Supplier's activities on the environment; and
- Supplier's ethical business practices.

### WHO MUST COMPLY?

This Code of Conduct applies to all Suppliers that provide goods or services to Canary. Supplier is responsible for compliance with the standards set out in this Code of Conduct ("**Standards**") throughout its operations and throughout its entire supply chain.

Without limiting Supplier's obligations hereunder, Supplier shall comply with the Standards in:

- all of its Facilities; and
- all of its operations, including with respect to manufacturing, distribution, packaging, sales, marketing, product safety and certification, intellectual property, labor, immigration, health, worker safety, and the environment.

Without limiting Supplier's obligations hereunder, Supplier is responsible for compliance with the Standards by all of its suppliers, vendors, agents, and subcontractors and their respective Facilities ("**Partner(s)**").

### STANDARDS.

#### 1. COMPLIANCE WITH LAW.

1. In the conduct of its activities, Canary is committed to complying with all applicable laws, regulations and national and international conventions, as well as with the best practices, in particular with regards to ethics, social responsibility, and protection of the environment. As such, Canary expects its Suppliers to apply the same respect for applicable laws and ethics principles. Supplier shall comply with all applicable national and local laws and regulations (including laws and regulations relating to all the Standards), and with the principles stipulated in the Conventions of the International Labour Organization, the Universal Declaration of Human Rights, the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the United Nations Women's Empowerment Principles.
2. Where law or other applicable regulations address the same issue as this Code of Conduct, the highest standards shall apply. Where this Code of Conduct is in contradiction with applicable law, the applicable law shall apply.

#### 2. LABOR STANDARDS AND SOCIAL RESPONSIBILITIES.

1. **Prohibition of Forced Labor.** All labor must be voluntary. Supplier shall not support or engage in slavery or

human trafficking in any part of its supply chain. Without limiting Supplier's obligations hereunder, Supplier shall not, and shall ensure that its Partners do not, support or engage in, or require any compelled, involuntary, or forced labor; bonded labor; indentured labor; and prison labor. Withholding identity papers or work permits or requiring workers to deposit a bond or the use of any other constraint is strictly prohibited. Supplier may not require workers to work to repay a debt owed to Supplier or any third-party. All workers are entitled to accept or leave their employment freely.

2. **Prohibition of Child Labor.** Work by children under the age of sixteen (16) is strictly prohibited. In countries where local laws set a higher age than 16, the highest age is applicable. Without limiting Supplier's obligations hereunder, Supplier shall not, and shall ensure that its Partners do not, support or engage in, or require any labor which is likely to jeopardize a person's physical or mental health, safety, or morals, to be performed by any person under the age of eighteen (18).
3. **Prohibition of Illegal, Clandestine, and Undeclared Employment.** Supplier is required to comply with all applicable regulations to prevent illegal, clandestine, and undeclared employment.
4. **Prohibition of Discrimination.** Canary requires that Supplier treat all workers equally and fairly. Suppliers may not engage in any kind of discrimination. In particular, Supplier shall not discriminate in regards to hiring, compensation, training, advancement or promotion, termination, retirement, or any other employment practice based on race, color, national origin, gender, gender identity, sexual orientation, military status, religion, age, marital or pregnancy status, disability, or any other characteristic other than the worker's ability to perform the job.
5. **Prohibition of Harassment and Abuse.** Canary requires that Supplier treat workers with respect and dignity. Supplier shall not subject workers to corporal punishment, or physical, verbal, sexual, or psychological abuse or harassment. Supplier must not condone or tolerate such behavior by its Partners.
6. **Wages and Benefits.** Supplier must compensate all workers with wages, including overtime premiums, and benefits that, at a minimum, meet the higher of: the minimum wage and benefits established by applicable law; collective agreements; industry standards; and an amount sufficient to cover basic living requirements. Supplier shall make wage payments at least monthly and provide benefits on a timely basis. Supplier's obligation to compensate and provide benefits applies to all workers at all times, including during periods of training, apprenticeship, and probation.
7. **Work Hours.** Supplier shall not require or allow workers to work more than the maximum legally permitted number of regularly paid hours worked per week. Additional overtime hours are voluntary, and must not exceed the maximum legally permitted number of overtime hours worked per week.
8. **Freedom of Association and Collective Bargaining.** Canary requires Supplier to respect, and not interfere with, the right of workers to decide whether to lawfully associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining, without any sanction, discrimination or harassment.

### 3. ENSURING HEALTH AND SAFETY.

1. Canary expects Suppliers to provide a safe, healthy, and sanitary working environment to their workers. Supplier shall implement procedures and safeguards to prevent workplace hazards, and work-related accidents and injuries which may be caused by, related to, or result from their work, including during the operation of equipment or during work-related travel. Supplier is required to comply with all applicable local and international regulations and laws in this regard. Supplier shall provide workers adequate and appropriate personal protective equipment to protect workers against hazards typically encountered in the scope of work.

### 4. ENVIRONMENTAL REGULATIONS AND PROTECTION.

1. **Operation of Supplier's Facilities.** Supplier shall operate its Facilities in compliance with all environmental

laws, including laws and international treaties relating to waste disposal; emissions; discharges; and hazardous and toxic material handling.

2. **Inputs and Components**. Supplier must ensure that the goods that it manufactures (including the inputs and components that it incorporates into its goods) comply with all environmental laws and treaties. Supplier must ensure that it will only use packaging materials that comply with all environmental laws and treaties.
  3. **Resource Efficiency and Waste Minimization**. Supplier shall seek to improve resource efficiency and reduce resource consumption including raw materials, energy, water, and fuel. Supplier is expected to make reasonable efforts to eliminate or reduce levels of waste (both solid and wastewater) generated and to increase landfill diversion, reuse, and recycling. Supplier is encouraged to develop and use environmentally friendly innovations and practices that reduce negative environmental impacts.
  4. **Pollution and Emissions Reduction**. Supplier shall take reasonable steps to minimize emissions of greenhouse gases and of toxic and hazardous pollutants. Supplier is encouraged to track greenhouse gas emissions and to set science-based (in-line with the Paris Agreement) greenhouse gas reduction goals.
5. **BUSINESS INTEGRITY REQUIREMENTS**. Canary requires exemplary integrity from Suppliers in the conduct of their business activities.
1. **Confidentiality**. Supplier shall abide by its obligations relating to protection, collection, and proper handling of confidential information.
  2. **Protection of Personal Information**. Canary requires Suppliers to comply with all applicable federal, state, and foreign laws, directives, and regulations relating to the processing and protection of personally identifiable information (PII) or personal data (**Personal Information**). This includes, but is not limited to, the EU General Data Protection Regulation (Regulation (EU) 2016/679) (**GDPR**) and the California Consumer Privacy Act (**CCPA**) (Cal. Civ. Code §§1798.100 to 1789.199).
  3. **Customs and Security Authorities**. Supplier shall comply with applicable customs laws, including those relating to imports and the ban on transshipment of merchandise to the importing country.
  4. **Trade Restrictions and International Sanctions**. Supplier shall respect international trade restrictions and sanctions, taking into account any changes in these measures, as well as all laws and regulations concerning export controls.
  5. **Prevention of Insider Trading**. Supplier acknowledges that Supplier or its Partners may gain access to proprietary information about Canary's clients that could be deemed material non-public information under U.S. federal or state securities laws or similar laws in foreign jurisdictions. As applicable, Supplier and its Partners will not use or disclose such proprietary information for trading in Canary's clients' securities or for any other purpose in violation of U.S. federal or state insider trading laws or similar laws in foreign jurisdictions.
  6. **Prohibition of Money-laundering**. Money-laundering can occur where an action is taken to mask the true origin of money or assets that are connected to criminal activity. Supplier must commit to taking all appropriate measures to prevent their operations from being used as vehicles for money-laundering.
  7. **Prohibition of All Forms of Corruption**. Canary expects Supplier to respect all applicable laws concerning corruption and to take appropriate measures to prevent, detect and sanction any corruption or trading in influence, directly or indirectly, across the scope of Supplier's activities.
  8. **Prevention of Conflicts of Interest**. Supplier must comply with all applicable laws concerning conflicts of interest and to make every effort to prevent the occurrence of situations that create a conflict of interest within the scope of their business relationship with Canary.
  9. **Respect for Competition**. Supplier must be committed to compliance with competition law applicable in their

host countries.

10. **Gifts and Invitations**. Gifts or invitations may be considered acceptable expressions of courtesy within the context of good business relations if limited in scope and value, given openly and transparently, permitted under applicable local law, customary in the location in which they would be given, provided to reflect gratitude or esteem, and not offered with an expectation that something will be offered in return. In some cases, these practices might be subject to anti-bribery or anti-corruption regulations or other legal requirements. Therefore, it is important to be aware of such rules and fully comply with them.
11. **Public Statements**. Supplier is expected to be extremely attentive to their public statements, particularly on the Internet and in social media, and to ensure that any statements are not attributed to Canary or Canary's clients, and are consistent with Supplier's commitment to both confidentiality and professional secrecy.
12. **Information Transparency**. Canary requires Suppliers to provide clear and accurate information regarding the methods and resources used, production sites and characteristics of the products or services supplied, and to refrain from making any misleading claims.

#### **TERMINATION.**

Supplier has a responsibility to act ethically and to comply with applicable law, this Code of Conduct, and Canary policies and procedures at all times. Violations break trust with Canary and our clients. In the event of any violation of this Code of Conduct or any failure to meet the Standards herein, Canary reserves the right to review the business relationship and may immediately terminate its business relationship (including any purchase order(s) and purchase contracts) with Supplier, without prejudice to other rights of Canary or remedies it might seek.

#### **INSPECTION AND AUDIT.**

1. **Inspection**. Supplier acknowledges that these Standards set out audit standards that Canary may use to determine whether Supplier is meeting the requirements set out in this Code of Conduct. Supplier acknowledges that Canary may in its discretion conduct inspections of the Facilities to confirm Supplier's compliance with this Code of Conduct. Canary has no obligation to conduct inspections.
2. **Accurate Records and Access to Information**. Supplier is required to keep proper records to demonstrate compliance with this Code of Conduct. Supplier must provide Canary with access to complete, original and accurate records.