



# GroundWork Renewables, Inc. Supplier Code of Conduct

## 1. Law And Code Compliance

Our suppliers are expected to comply with and will be monitored to:

1. All relevant and applicable laws and regulations of the country in which workers are employed including those at the federal, state/provincial and local community levels, and,
2. This Supplier Code of Conduct.

Over time we will, in conjunction with our suppliers, identify further areas where GroundWork and our suppliers can work closer together to achieve improved working conditions, environmental impact, and social benefits to our communities.

## 2. Business Ethics

Suppliers are expected to conduct business ethically and lawfully; all business dealings should be fair, legal and honest. This includes having controls in place that prohibit and detect the misuse of company assets, corruption, bribery, improper gifts, extortion, embezzlement and even the appearance of conflicts of interest. Suppliers will accurately reflect their business dealings in their books and records.

If suppliers extend any business courtesies to our employees, they will do so infrequently, and the courtesies must be of no more than moderate value.

## 3. Forced Labor

There shall not be any use of forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise.

## 4. Child Labor

Factories shall employ only workers who meet the applicable minimum legal age requirement or are at least 15 years of age, whichever is greater (ILO Convention No. 138).

1. The factory complies with all applicable child labor laws, including those related to hiring, wages, hours worked, overtime, and working conditions.
2. The factory encourages and allows eligible workers, especially younger workers, to attend night classes and participate in work-study programs and other government-sponsored educational programs.

## 5. Harassment and Abuse

Every employee shall be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological, or verbal harassment or abuse.



## 6. Discrimination

No person shall be subject to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination, or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, or social or ethnic origin.

## 7. Freedom Of Association and Collective Bargaining

Workers must be free to join organizations of their own choice. Suppliers shall recognize and respect the right of employees to freedom of association and collective bargaining.

## 8. Employment Relationship

Employers shall adopt and adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard their rights under national and international labor and social security laws and regulations.

## 9. Wages And Benefits

Employers shall meet all legal requirements relating to wages and benefits, pay accurate wages in a timely manner, and shall not use wage deductions as a disciplinary measure. Additionally, employers shall pay wages that equal or exceed minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law and/ or contract. Employers will also provide business ethics and compliance training to employees, as well as training on Environmental Health & Safety and related professional skills training to all employees periodically.

## 10. Overtime Wages

In addition to compensation for regular working hours, employees must be compensated for overtime hours at the rate legally required in the country of manufacture or, in those countries where such laws do not exist, at a rate exceeding the regular hourly compensation rate.

## 11. Hours Of Work

The regular working week shall not exceed 48 hours or the maximum allowed by the law of the country of manufacture, whichever is less.

1. Employers shall allow workers at least 24 consecutive hours of rest every seven-day period.
2. All overtime work shall be consensual. Employers shall not request overtime hours on a regular basis.

The sum of regular and overtime hours in a week shall not exceed 60 hours or the maximum allowed by the law of the county of manufacture, whichever is less. (ILO Convention No. 1).



## 12. Environmental Responsibility

We seek out suppliers committed to environmental responsibility. We ask each vendor about their own 'in-house' environmental practices (e.g. waste reduction), environmental certifications, and information on the specific kind of materials they use in manufacturing their products.

## 13. Health And Safety

Suppliers shall provide its employees with a safe, hygienic and healthy workplace, including physical and psychosocial health. Suppliers shall ensure that appropriate health and safety information is provided to its employees, sub-suppliers and contractors and that relevant training and protective equipment is provided. Additionally, suppliers shall have a system for workers to report health and safety incidents and near-misses. Suppliers shall implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate workers' return to work.

Furthermore, suppliers will identify and plan for potential emergencies, and will implement emergency plans and provide guidance to workers on emergency response procedures, including emergency reporting, worker notification and evacuation, drills, fire detection and suppression equipment, exit facilities, and recovery plans.

## 14. Community

GroundWork encourages all suppliers and their employees to get involved in local social and environmental community charity efforts by volunteering time and/or providing other types of support. We seek long-term partnerships with suppliers that have philanthropic values.

## 15. Animal Welfare

Suppliers must respect animal welfare and work progressively towards adopting healthy and humane practices towards animals based on best available technology and standards.

## 16. Traceability

GroundWork and our suppliers are jointly responsible for ensuring social and environmental responsibility and the integrity of our product content claims right through to the finished goods at the factory level. The only way to achieve this goal is to have transparency and traceability at all levels of our supply chain. GroundWork requires suppliers to map and continuously track and monitor all locations in all levels of their supply chain. Suppliers must, upon request, provide transparency information into the owned and/or subcontracted factories and other sites that are involved in the production of our products.



## 17. Code Communication

All suppliers are urged to: (1) post the GroundWork Renewables Code in a conspicuous place frequented by all employees in the local languages spoken by employees, supervisors, and managers; (2) undertake annual, documented training efforts to educate current and new employees about the GroundWork Renewables Code standards.

## 18. Quality

Quality is the result of clarity, capable and well-integrated systems, and good communication. To achieve this, factories must have a clearly documented quality system and quality improvement plan. That system must include reliable “in process” and final finished goods audits and procedures that meet GroundWork Renewables’ quality standards. These audits must be performed by a trained QA staff member provided by the factory. The QA staff member must be granted the autonomy and support needed in order to provide an unbiased report on the quality of every shipment of finished goods. This includes packaging and printing quality control. Compliance with our quality requirements is monitored by GroundWork Renewables.

**CONTACT US:** If suppliers are violating any of these Code elements, we would like to know about it. Please bring these issues to our attention by contacting us by email at [cameron@grndwork.com](mailto:cameron@grndwork.com). Please feel free to write in your local language. All information we receive will be kept in strict confidence and your identity protected.