



## Supplier Code of Conduct

### Minimum Standards of Conduct for Vervante Suppliers

Suppliers of goods and services to Vervante, Inc. shall comply with all relevant laws and regulations pertaining to ethical labor laws, not just within the United States of America but also internationally. In addition to complying with relevant labor laws and regulations, as a condition of doing business with Vervante all suppliers shall affirmatively confirm their compliance with the following minimum standards of conduct.

The failure to abide by relevant laws and regulations or to comply with these minimum standards of conduct is cause for immediate suspension or termination of a supplier's contract with Vervante.

#### **Employment Practices**

Each supplier shall hire, promote and compensate its employees based solely on their performance and abilities, without discrimination based on race, gender, nationality, ethnicity, sexual orientation, marital status, religion, or any other legally-protected status.

Each supplier shall timely pay fair compensation to its employees in local currency in at least the minimum wage required by local law or the prevailing industry wage, without requiring unreasonable working hours exceeding industry and humanitarian norms.

Each supplier shall provide a workplace free from sexual, physical and verbal conduct causing a hostile or offensive environment.

#### **No Child Labor**

No supplier (either directly or indirectly) shall employ children younger than the age of completion of compulsory schooling (and in no case younger than 15 years old) in violation of local, national or international law (including International Labour Organization Conventions 138 and 182, subject to specified economic exceptions). No supplier shall utilize labor by children under 18 years of age for hazardous work (as defined by Convention 182), including work underground, under water, at dangerous heights, with dangerous equipment, with strenuous labor, with hazardous substances, or for excessive hours.



### **No Forced Labor**

No supplier shall force any person to work under threat of physical harm, economic duress or other hardship—whether in the form of forced prison labor, indentured labor, bonded labor or otherwise. Slavery, human trafficking and similar practices—however denominated—are forbidden throughout the entire supply chain for goods and services ultimately provided to Vervante.

No supplier shall take possession or control of its employees' identification documents, visas, passports, or financial documents.

### **Work Conditions**

Each supplier shall use its best efforts to provide clean and safe work conditions for their employees, with access to potable water and sanitary restroom facilities, and free from unprotected exposure to hazardous materials or unreasonably dangerous equipment. If suppliers provide residential accommodations for employees, these accommodations must be clean and safe, with adequate emergency exits, secure personal spaces, and reasonable access to warm clean water for washing.

Each supplier shall make reasonable efforts to assure that its employees are not subjected to undue physical strain or risk, and that they have appropriate personal equipment and clothing, in order to prevent serious work-related accidents and injuries.

### **Business Ethics**

Each supplier shall comply with local, national and international laws and regulations in the performance of its business activities. No supplier shall pay or accept bribes, kickbacks or other illegal inducements in its business and government relationships.

### **Supply Chain**

Each supplier of goods delivered to Vervante shall use its best efforts to ensure that its wholesale suppliers (and all other reasonably discernable sellers of goods in the supply chain) are in compliance with the foregoing minimum standards of conduct relating to child and human-trafficking labor.