

RESPONSIBLE SUPPLY CHAIN STANDARDS

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Definitions

INTRODUCTION

When interpreting these Standards, we follow UN and ILO guidance materials and definitions. Our commitment and approach are informed by leading international standards and frameworks developed by the United Nations (UN) and the International Labour Organization (ILO) based on respecting and supporting the UN Guiding Principles on Business and Human Rights, the UN Universal Declaration of Human Rights, the Core Conventions of the ILO, and the ILO Declaration on Fundamental Principles and Rights at Work., as well as the UN Declaration on Indigenous Peoples Rights.

All products and services shall be manufactured, produced or provided by these standards even where these meet or exceed all applicable laws and regulations

We reserve the right to temporarily suspend or terminate a relationship at any time for failure to meet our Standards. Termination shall be considered as a last resort, for reasons including when a supplier refuses to cooperate with an assessment, refuses to change a required behavior or practice, does not make timely progress on remediation, or engages in falsification or misrepresentation of records or other illegal or deceitful activity. We encourage Suppliers to utilize credible third-party certifications, including for materials, production processes, and products, where applicable.

Labor Rights

Work Done by Young Employees and Child Labor

VIPA Group is committed to the United Nations Universal Declaration of Human Rights. Hence, Suppliers shall comply with human rights and convict all forms of forced and/or child labor in their facilities and operations, following all the national and international regulations on minimum wages, overtime, and maximum hours. Moreover, they shall comply with ILO 132- Minimum Age Convention, and ILO 182- Worst Forms of Child Labor.

VIPA Group demands that workers' rights be respected. Suppliers shall not employ workers who:
(i) under the age of 15; (ii) the age for completing compulsory education; or (iii) the minimum working age in the country in which the work takes place, whichever is higher. Workers under the age of 18 ("Young Workers") shall not engage in hazardous work, including work that may jeopardize their health or safety or interfere with their education (e.g. night shifts, overtime). Suppliers who employ young workers shall comply with all local laws regarding working conditions.

Migrant workers

Suppliers should pay particular attention to the risks of exploitation facing domestic and foreign migrant workers. Suppliers shall respect the rights of migrant workers and shall not discriminate against them. Migrant workers have the same employment rights as local workers where permitted by law. Supplier shall only employ workers who are legally entitled to work, unless participating in an approved refugee or migrant worker program. These workers shall be employed in full compliance with the immigration and labor laws of the host country. Employees shall be able to terminate the contract voluntarily without penalty upon reasonable or legally permitted notice.

Compulsory & Forced Labor, Human Trafficking, and Modern Slavery

We condemn any form of child, forced, or bonded labor, along with human trafficking, as forms of modern slavery. We define modern slavery as when an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom. This includes but is not limited to human trafficking, forced labor, and debt bondage.

Suppliers shall not use forced or compulsory labor, including slavery, prison, forced or bonded labour. VIPA Group shall not tolerate Suppliers who sell their workers or exploit them through threats, violence, coercion, kidnapping, fraud or other methods. All work shall be done voluntarily.

Student workers, Interns and Apprentices

VIPA expects all Suppliers to respect the rights of working students, interns and trainees. Suppliers shall diligently manage student workforce programs by properly maintaining student records, subjecting educational partners to rigorous due diligence, and protecting student rights through applicable laws and regulations. is expected. In the absence of local law, wage rates for working students, interns, and apprentices shall be at or above the wage rates set forth in applicable laws and regulations. Same pay rate as other entry-level employees performing the same or similar tasks. The apprenticeship program is temporary or you shall qualify for full-time employment after completing the program. Suppliers shall provide students with information about when and how their education shall end and the options available to them so that they can make informed decisions.

Working Hours

Suppliers are required to ensure the safety, health, and well-being of their employees and their employees. In general, we require our partners to limit the additional working hours during which their employees may perform their duties under the labor laws of the countries in which they operate. Suppliers shall provide workers with legally mandated breaks or reasonable breaks where the law does not provide exceptions.

Anti- Harassment & Abuse

Suppliers shall treat employees with dignity and respect and shall not tolerate harsh or inhumane treatment, coercion, restraint, or physical, psychological, sexual or verbal harassment, including unwanted sexual advances.

We encourage our Suppliers to implement policies prohibiting these activities and to communicate this to all employees, including native language employees. We encourage our Suppliers to provide gender-sensitive training on sexual harassment and gender-based violence to all managers, supervisors and employees.

Anti-Discrimination

Suppliers are expected not to discriminate in employment or other practices on the basis of race, color, national origin, gender, sexual orientation, religion, disability, age, political opinion, pregnancy, etc.

We also expect our Suppliers to comply with ILO Convention 100 on Equal Remuneration and ILO Convention 111 on Discrimination.

Wages & Benefits

Suppliers are obligated to pay their employees, including contract workers and those paid on a piece rate, on time, and in a way that complies with or surpasses current rules for minimum wages and allowances, overtime pay, benefits, and paid leave. Where wages are below the country's living wage, steps should be taken to achieve higher wages toward living wage levels.

Freedom of Association

Suppliers shall respect workers' rights to freedom of association and collective bargaining. Employees and workers cannot be penalized for joining such associations and exercising their legal rights accordingly. The standards require that wages of local and migrant forest workers, contractors and other operators meet or exceed at least statutory industry-specific minimum standards or collective bargaining agreements as appropriate.

Grievance Mechanism & Reporting

The Complaints Reporting mechanism specifies VIPA's standards for a full mechanism for reporting and processing suspected breaches of VIPA's Code of Business Conduct & Ethics, and VIPA's Responsible Supply Chain Standards. The mechanism forms part of wider feedback processes that embrace both operational and sensitive feedback from VIPA's stakeholders.

Health & Safety

Safe working conditions

Suppliers shall maintain safe working conditions. This includes providing supplier-managed secure facilities, plant infrastructure, and machinery. Facilities supplier-controlled and environments shall be professionally inspected to meet all legal requirements, be structurally sound, have adequate material strength, and withstand the risks of seismic activity, wind, and other natural hazards, should be designed. All actions shall be taken to avoid work environments that are in imminent danger of collapsing or that pose imminent threats to life, such as uncontrolled fire, electrical, mechanical, chemical, and biological hazards.

Suppliers shall identify, assess and mitigate these hazards using best practices. This may include removing hazards. Replace processes or materials. Control by good design. Implementation of technical and administrative controls, preventive maintenance, and safe work procedures (including lockout/tagout). Provide ongoing training on workplace health and safety. Where hazards cannot be adequately mitigated in this manner, Suppliers shall provide workers with suitable, well-maintained personal protective equipment free of charge and training on when and how to use the equipment correctly. Workers who work with (or are exposed to) hazardous conditions or materials shall be informed of the risks those hazards pose to them and receive appropriate pre-training and ongoing training. Suppliers shall be aware of workplace health and safety risks that may affect pregnant or lactating persons, take reasonable steps to eliminate or mitigate those risks and provide notice of the hazards and take reasonable precautions.

Sanitation & Hygiene

Supplier shall provide workers with safe and sanitary conditions in all work environments controlled by Supplier. Workers shall have adequate and unrestricted access to basic sanitation (handwashing stations, safe drinking water, clean toilet facilities, waste bins, etc.) in all supplier-controlled work environments . We encourage our Suppliers to provide toilet facilities that are sensitive to employee numbers and individual privacy. It is recommended that toilets (and showers, if applicable) be separated for employees of different genders. If the Supplier provides canteens or other catering facilities, sanitary facilities for food preparation, storage and catering are required. We encourage our Suppliers to provide reasonable physical access to catering facilities for all workers.

Product Safety

We expect our Suppliers to respect all the guidelines, regulations, and standards regarding product safety, as stated in VIPA's Product Safety Policy. VIPA Group expects its Suppliers to comply with all national and international applicable regulations, such as, but not limited to:

- DIRECTIVE 2001/95/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 3 December 2001 on general product safety
- REGULATION (EU) No 1025/2012 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 25 October 2012 on European standardization.
- DIRECTIVE 94/62/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 December 1994 on packaging and packaging waste
- Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on general product safety 2021/0170 (COD) amending Regulation (EU) No 1025/2012 of the European Parliament and the Council, and repealing Council Directive 87/357/EEC and Directive 2001/95/EC of the European Parliament and of the Council
- REACH / SVHC REGULATION (EC) No 1907/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 December 2006

Ethical Behavior

Anti-Bribery, Anticorruption, and Antitrust

VIPA Group expects the Suppliers to comply with all applicable anticorruption and antitrust laws and regulations in the jurisdictions that they operate in. VIPA Group shall not tolerate Suppliers engaging in bribery for any reason, whether related to government officials or the private sector. Suppliers shall not, directly or indirectly, accept: offer, give, authorize, or promise anything of value to any government official, and/or any person of influence to encourage or reward improper conduct. Suppliers shall implement and maintain monitoring, recording, and enforcement procedures to ensure compliance with anti-corruption laws. This includes offering, promising, approving, awarding, or accepting anything of value that gives or provides an unfair or improper advantage to anyone for any reason.

Transacting Global Business

Suppliers shall comply with all applicable import, reimport, sanctions, anti-boycott, export, and reexport control laws. The Supplier agrees to comply with sanctions, embargoes, or other restrictions imposed by the jurisdictions that the Supplier operates in, or the United Nations, and European Union. In such cases, regulations of the United Nations or other competent authorities shall apply.

VIPA Group expects its Suppliers to comply with all applicable regulations, such as, but not limited to:

- EN643 Standard
- REACH Regulation
- Packaging and packaging waste Directive
- EUDR
- Food Contact (if applicable)

Privacy & Data Protection

VIPA's strives to create an environment of mutual understanding, knowledge exchange and innovative thinking with partners, which can only be achieved through trust. Suppliers shall comply with all applicable data regulations in their jurisdictional area.

All data and personal information collected by the Supplier shall be treated with absolute confidentiality and the parties concerned shall be informed of the use and purpose of the data collection as well as who to contact if they have any questions.

Environment

Environmental Protection

We expect our Suppliers to have the same environmental mindset as we do. With this in mind, our Suppliers shall comply with all environmental regulations in the jurisdictions in which they operate. Nonetheless, Suppliers should strive to improve and enhance their environmental performance with respect to all their actions with respect to this subject matter.

Energy Consumption & Green House Gas Emissions

We strongly support sustainable development. For this reason, we require our Suppliers to continuously improve the efficiency of their energy consumption and record, monitor and reduce their greenhouse gas emissions in line with international targets and standards. The Supplier shall provide all relevant information to VIPA group in respect to their actions upon request.

Sustainable Supply Chains

Suppliers shall commit to more sustainable sourcing by complying with all relevant regulations regarding the sourcing, handling, and manufacturing of raw materials. Such efforts should consider both the regulations applied by Suppliers' jurisdictions and other markets such as the European market. Nevertheless, Suppliers shall respect the legal land rights of individuals, indigenous peoples, and local communities. Suppliers shall not engage in land grabbing or illegal use of land or natural resources in our supply chain. Upon request, the supplier shall provide all relevant documentation to enable us to conduct an audit in the event of fraudulent activity. Nevertheless, Suppliers shall respect the legal and customary land rights of individuals.

Management and Disposal of Hazardous Waste

Suppliers shall comply with all national and international regulations regarding the prohibition or restriction of specific substances in products, services, operations and manufacturing. The supplier shall provide all relevant information to her VIPA group upon request. In addition, Suppliers shall provide their employees with appropriate training on the safe handling and disposal of Hazardous Waste.

Natural Resources Management

Supplier shall monitor and control the use and consumption of natural resources and take all appropriate measures to mitigate their impacts, including, but not limited to, water use, waste generation and natural resource management.

Environmental Permits

Suppliers shall obtain and keep current all required environmental permits, permits and registrations and comply with applicable operational and reporting requirements.

Management Systems

Management Systems

VIPA's aim is to create an environment of mutual understanding, knowledge exchange and innovative thinking with partners, which can only be achieved through trust.

All data and personal information collected by the Supplier shall be treated with absolute confidentiality and the parties concerned shall be informed of the use and purpose of the data collection as well as who to contact if they have any questions.

Training

Suppliers shall provide appropriate training for their managers and employees to implement these Standards and to comply with applicable legal requirements. We recommend that all training for managers and workers be tailored to address issues that disproportionately affect women and vulnerable groups.

Date:

On behalf of the Supplier:

Remediation

Suppliers shall maintain processes for timely resolution of nonconformities identified through internal or external assessments, inspections, investigations, reviews and reports.

Documentation & Records

Suppliers shall create, store and dispose of business records in full compliance with applicable legal requirements and demonstrate compliance with these standards. Suppliers shall maintain appropriate confidentiality to protect privacy. All establishments shall have a valid operating license. Suppliers are responsible for reviewing and complying with all legal requirements and obtaining the necessary permits and documents to operate, including but not limited to licenses (health and safety permits, use permits, etc.) and required customs documents. We are ready.

Definitions

child

person under the age of 15 years, or under the age of completion of compulsory schooling, whichever is higher

Note 1: Exceptions can occur in certain countries where economies and educational facilities are insufficiently developed, and a minimum age of 14 years applies.

These countries of exception are specified by the International Labour Organization (ILO) in response to a special application by the country concerned and in consultation with representative organizations of employers and workers.

Note 2: The ILO Minimum Age Convention, 1973, (No. 138), refers to both child labor and young workers.

collective bargaining

all negotiations that take place between one or more employers or employers' organizations, on the one hand, and one or more workers' organizations (e.g., trade unions), on the other, for determining working conditions and terms of employment or for regulating relations between employers and workers

Source: International Labour Organization (ILO), Collective Bargaining Convention, 1981 (No. 154); modified

<u>employee</u>

individual who is in an employment relationship with the organization according to national law or practice

entry level wage full-time wage in the lowest employment category

Note: Intern or apprentice wages are not considered entry level wages.

forced or compulsory labor

all work and service that is exacted from any person under the menace of any penalty and for which the said person has not offered herself or himself voluntarily

Source: International Labor Organization (ILO), Forced Labor Convention, 1930 (No. 29); modified

grievance

perceived injustice evoking an individual's or a group's sense of entitlement, which may be based on law, contract, explicit or implicit promises, customary practice, or general notions of fairness of

aggrieved communities

Source: United Nations (UN), Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework, 2011

human rights

rights inherent to all human beings, which include, at a minimum, the rights set out in the United Nations (UN) International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work

Source: United Nations (UN), Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework, 2011; modified

Definitions

indigenous peoples

indigenous peoples are generally identified as tribal peoples in independent countries whose social, cultural, and economic conditions distinguish them from other sections of the national community, and whose status is regulated wholly or partially by their customs or traditions or by special laws or regulations; peoples in independent countries who are regarded as indigenous on account of their descent from the populations which inhabited the country, or a geographical region to which the country belongs, at the time of conquest or colonization or the establishment of present state boundaries and who, irrespective of their legal status, retain some or all of their own social, economic, cultural and political institutions.

Source: <u>International Labor Organization (ILO), Indigenous and Tribal Peoples Convention, 1989 (No. 169).</u>

local community

individuals or groups of individuals living or working in areas that are affected or that could be affected by the organization's activities.

Note: The local community can range from those living adjacent to the organization's operations to those living at a distance.

local supplier

organization or person that provides a product or service to the reporting organization, and that is based in the same geographic market as the reporting organization (that is, no transnational payments are made to a local supplier)

Note: The geographic definition of 'local' can include the community surrounding operations, a region within a country or a country.

work-related injury or ill health

Interpretive Guide, 2012; modified

negative impacts on health arising from exposure to hazards at work.

Source: International Labor Organization (ILO), Guidelines on Occupational Health & Safety.

remedy / remediation

means to counteract or make good a negative impact or provision of remedy
Source: United Nations (UN), The Corporate
Responsibility to Respect Human Rights: An

Examples: apologies, financial or non-financial compensation, prevention of harm through injunctions or guarantees of non-repetition, punitive sanctions (whether criminal or administrative, such as fines), restitution, restoration, rehabilitation.

grievance mechanism

routinized process through which grievances can be raised and remedies can be sought.

Source: United Nations (UN), Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework, 2011; modified.

<u>supplier</u>

entity upstream from the organization (i.e., in the organization's supply chain), which provides a product or service that is used in the development of the organization's products or services

Examples brokers, consultants, contractors, distributors, franchisees, home workers, independent contractors, licensees, manufacturers, primary producers, sub-contractors, wholesalers

Note: A supplier can have a direct business relationship with the organization (often referred to as a first-tier supplier) or an indirect business relationship.

Definitions

supply chain

range of activities carried out by entities upstream from the organization, which provide products or services that are used in the development of the organization's own products or services.

worker consultation

seeking of workers' views before making a decision.

Note 1: Worker consultation might be carried out through workers' representatives.

Note 2: Consultation is a formal process, whereby management takes the views of workers into account when making a decision. Therefore, consultation needs to take place before the decision is made. It is essential to provide timely information to workers or their representatives in order for them to provide meaningful and effective input before decisions are made. Genuine consultation involves dialogue.

Note 3: Worker participation and worker consultation are two distinct terms with specific meanings. See definition of 'worker participation'.

worker

person that performs work for the organization.

Examples: employees, agency workers, apprentices, contractors, home workers, interns, self-employed persons, sub-contractors, volunteers, and persons working for organizations other than the reporting organization, such as suppliers.



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