



F.6 – Supplier Code of Conduct

Effective January 2020
Supersedes (April 2015)

POLICY:

Ensign-Bickford Industries, Inc. and its subsidiaries (the “Company”) are committed to operating with high ethical standards and integrity. Accordingly, we require all suppliers to comply with all aspects of this Supplier Code of Conduct. Our suppliers must conduct business in a manner that supports our commitment to: (1) high standards of health and safety; (2) fair employment practices; (3) legal compliance and business integrity; and (4) environmental stewardship.

SCOPE:

All Company suppliers and all employees responsible for procurement activities and negotiating supply arrangements for the Company.

RESPONSIBILITY:

High Standards of Health and Safety:

Ensuring health and safety is of utmost importance to the Company. We expect all suppliers to provide employees with a safe, clean and healthy work environment. We expect our suppliers to implement comprehensive health and safety standards for their employees including the integration of adequate safeguards, comprehensive health and safety management practices, and job-specific safety training. U.S. based suppliers must have OSHA-compliant practices in place to ensure the well-being of supplier’s employees.

Fair Employment Practices:

Suppliers must ensure that working conditions are conducive to upholding the human rights of workers. As such, suppliers must adhere to the following requirements.

- *No Child Labor/No Prison Labor*

Child labor shall not be used in any stage of manufacturing. All work must be voluntary. Suppliers are prohibited from using forced, bonded, indentured or voluntary prison labor. Slavery, trafficking or receiving services from vulnerable persons by means of threat, force, coercion, or abduction is also strictly prohibited.

- *Anti-Discrimination and Fair Treatment*

Suppliers should treat their employees with respect. Unlawful discrimination, harassment or abuse of any kind is not permitted. Hiring and employment decisions,

including those relating to compensation, benefits, promotion, training and development, discipline, and termination, should be made based solely on skill, ability, and the performance of workers.

- *Wages, Benefits and Work Hours*

Suppliers should supply their employees with compensation that includes wages, overtime pay, and benefits that meet or exceed the legal minimum standards. Employees are to be paid in a timely fashion. Suppliers must ensure that work schedules and overtime are consistent with all applicable laws, including maximum hour and rest period laws. If there are no legal minimum standards in a particular jurisdiction, suppliers should ensure that compensation and benefits are at least comparable to those at similar companies in the local area or to prevailing industry norms.

Legal Compliance and Business Integrity:

Suppliers must comply with all applicable laws and regulations. If there is a conflict between what the law requires and the standards in this Supplier Code of Conduct, Company expects its suppliers to meet the higher standard.

- **Anti-Corruption**

Company has a zero-tolerance policy for corruption. We do not tolerate corruption in any form, and we expect the same from our suppliers. Suppliers must operate with the highest standards of business integrity and comply with all anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act. Suppliers are prohibited from offering or accepting any bribe, kickback, or favor, and from using any improper influence when dealing with government officials or in any business arrangement. Suppliers must not directly or indirectly give or receive improper business advantage by giving or receiving anything of value in exchange for preferential treatment.

- **Pro-Competitive Business Practices**

Suppliers will comply with all applicable antitrust and competition laws and will conduct their business in a pro-competitive fashion. The following practices are strictly prohibited: unlawfully restraining competition, collusive bidding, price fixing, price discrimination, improper market allocation, falsification of documents, and any other unfair trade practice in violation of antitrust laws.

- **Accurate Business Documentation**

Suppliers will accurately record, maintain, and report business documentation, including, but not limited to, financial accounts, quality reports, time records and expense reports.

- **Protection of Confidential Information**

Suppliers must take proper care to protect all Company confidential and proprietary information. Company's confidential and proprietary information should not be used for any purpose beyond the scope of the business arrangement with Company, unless authorized in writing by an officer of Company.

Environmental Stewardship:

We expect our suppliers to operate in a manner that actively manages environmental risk, conserves natural resources, and protects the environment. At a minimum, suppliers must fully comply with all applicable environmental laws and regulations and should strive to conduct their operations in an environmentally sensitive manner. Company will give preference to suppliers who are environmentally conscious.

- **Environmental Permits**

Supplier must obtain, maintain and keep current all required environmental permits, approvals and registrations. Supplier will also comply with any applicable operational or environmental reporting requirements.

- **Pollution Prevention and Resource Reduction**

Suppliers should reduce waste and usage of all types by implementing appropriate conservation measures in their operations. Improvement plans for waste reduction, recycling, energy conservation and greenhouse gas mitigation policies should be in place, along with demonstrable evidence of implementation.

Record Keeping and Compliance Requirements:

Supplier should have adequate monitoring and record keeping systems to ensure compliance with this Supplier Code of Conduct. Company reserves the right to monitor, review and verify compliance with this Supplier Code of Conduct. Upon request, suppliers must be able to demonstrate compliance with this Supplier Code of Conduct. Company reserves the right to terminate any agreement or arrangement with supplier if compliance with this Supplier Code of Conduct cannot be demonstrated.