



Samuel, Son & Co., Limited Supplier Code of Conduct

Purpose and Scope

Samuel, Son & Co., Limited, including all divisions, subsidiaries, and affiliates (Samuel) is committed to its core values of relationships, responsibility, and sustainability, and how we choose to work with our suppliers, their employees and third-party representatives (suppliers) is an integral part of that commitment. This Supplier Code of Conduct (code) establishes the foundation upon which all Samuel / Supplier relationships will be built, in alignment with our focus on doing the right things for our customers and our employees, while never compromising our integrity. We safeguard our employees' health and well-being, we give back to our communities, and we demonstrate respect for the environment.

Samuel expects all suppliers to operate in accordance with standards comparable to ours and generally accepted ethical business standards, in compliance with the law, and with full respect for all governing Samuel policies.

BUSINESS INTEGRITY

Compliance with Law

Suppliers are expected to be operating in full compliance with all laws, regulations, principles of any and all jurisdictions in which they operate.

Conflict of Interest

In regards to any ongoing or potential future business relations Suppliers are expected to disclose any existing relationships with any Samuel employee. Suppliers must remain vigilant in their commitment to not attempt to leverage any existing relationships in an attempt to secure business or to impact negotiations in their favor.

Gifts or Entertainment

Offers of gifts or entertainment should not be made with an intent to gain business advantage. Nor should they, by quantity, quality, or timing have the appearance of an attempt to gain favor.

Anti-Bribery / Anti-Corruption

Suppliers must not engage in any activity which could put Samuel in a position of potential violations of any laws related to anti-bribery or anti-corruption.

Inside Information

Suppliers are expected to have policies in place, and available for Samuel review, addressing the handling of any information they become privy to in regards to Samuel or our customers. These policies must make reference to compliance with all appropriate laws and regulations.

BUSINESS PRACTICE

Privacy and Information Security

Engagement in business often requires an exchange of sensitive information and as such suppliers are expected to respect Samuel information and requirements for confidentiality in regards to it. Samuel expects all suppliers to have stringent information technology controls in place to manage all information exchanged, and is expected to provide immediate notification of any suspected security breaches which could potentially expose Samuel to risk or loss of information.

Business Continuity / Contingency Planning

In order to avoid risk to Samuel related to business interruptions at a supplier, Samuel expects all suppliers to have contingency and disaster plans in place to enable continuation, or expedited resumption, of supply and/or services should a situation arise.

Outsourcing and Subcontracting

Samuel understands that over the course of normal business there may be times a supplier needs to outsource goods or services to support a Samuel requirement. As Samuel's primary supplier it should be understood that any intent to subcontract any aspect of Samuel's requirement must be disclosed to Samuel. As an affiliated party of Samuel's supplier, all subcontractors are subject to this same Code of Conduct. It is expected that a primary supplier will communicate to, and receive sign-off on, this Code of Conduct from any 3rd party involved in the supply chain supporting Samuel.

Record Keeping

Suppliers are obliged to make Samuel aware of any pending or threatened legal or regulatory proceeding which Samuel may become party to, and to not destroy any Samuel related records which may be relevant to said proceeding.

BUSINESS ETHICS

Environment, Health and Safety

Nothing is more important than the safety and well-being of our employees, and of the environment we work and live in. Samuel focuses on creating healthy and safe workplaces and on practices that contribute to environmental sustainability, and expects our suppliers to do the same. Suppliers are expected to have robust health and safety policies and programs in place which include avenues for employees to report concerns without fear of reprimand or other recourse. In addition, Samuel focuses on minimizing our consumption of natural resources by reducing, reusing, and recycling whenever possible. For more information on Samuel's policy on Health, Safety, and the Environment please refer to our [Corporate Health, Safety and Environmental Policy](#).

Workplace Diversity

Suppliers should value the people that have made them successful. Samuel expects suppliers to strive to create workplace environments in which **all** employees are treated with dignity and respect, regardless of gender, age, ethnicity, color, sexual preference, religion, or disability, and in which equality of opportunity is in place.

Employment Practices

Samuel expects all suppliers to comply with all laws and regulations surrounding employment standards, labor, non-discrimination and human rights. Where legal standards do not specifically exist our expectation is that suppliers will self-regulate to ensure:

- Child labor is not used, by their business or any affiliated or subcontracted partners,
- Discrimination or harassment are not present in the workplace,
- Employees are provided an avenue to voice concerns or report violations of policy without fear of reprisal,
- All employment practices meet or exceed standard legal requirements and are applied equally within the workplace.

Samuel expects all suppliers to comply with this Code of Conduct and reserves the right, on occasion, to evaluate compliance through review of certain documentation and employee survey. In acknowledgement of compliance please sign and date below and return to Procurement.Policy@Samuel.com.