

Circletree Enterprises Business Code of Conduct – Suppliers

Circletree Enterprises and its companies (collectively, the “Company”) are committed to maintaining transparent, honest, and ethical operations in all aspects of our business.

We demand all our business vendors and suppliers to maintain the same commitment to ethical behavior and therefore ask you to confirm your agreement with our Business Code of Conduct, being shown below, as amended where necessary for non-Circletree entities.

We demand all our business vendors and suppliers use appropriate systems to facilitate and monitor compliance with these standards and adherence to applicable national and international laws.

We demand all our business vendors and suppliers demonstrate their commitment to the principles of this code and to have an on-going process of risk management to identify the environmental, health and safety, labor practices, and ethics risks associated with the suppliers’ operations.

We demand that all our business vendors and suppliers encourage staff to report concerns without fear of threat or reprisal. All business vendors and suppliers should take appropriate action as required.

We require all business vendors and suppliers to put in place equivalent standards to this Code for their own supply chain.

Expectations for Supplier

Supplier recognizes and agrees to adhere to the following expectations and obligations:

1. We recognize our obligations to all who have a stake in our success including clients, team members, vendors, and suppliers.
2. Information about the Company’s business shall be communicated clearly and accurately in a non-discriminatory manner and in accordance with local and national regulations.
3. People are selected and promoted based on their qualifications and merit, without discrimination or concern for race, religion, national origin, color, sex, sexual orientation, gender identity or expression, age or disability.
4. A workplace must be safe and civilized and that employment must be freely chosen; we will not tolerate sexual harassment, discrimination, or offensive behavior of any kind, which includes the persistent demeaning of individuals through

words, actions, the display or distribution of offensive material, and the use or possession of weapons on the Company or client premises. In particular:

- i. All workers are able to provide verifiable identification;
 - ii. Child labor is not to be used;
 - iii. Compensation paid to workers must comply with all applicable wage laws;
 - iv. There are antiharassment and antidiscrimination policies in place;
 - v. There are working conditions for all workers and compliance with all safety laws, rules, and regulations; and
 - vi. Systems must be in place to manage, track, and report occupational injuries and illness.
5. We will not tolerate the use, possession, or distribution of illegal drugs, or our people reporting for work under the influence of drugs or alcohol.
 6. We will treat all information relating to the Company's business, or to its clients, as confidential.
 7. We are committed to protecting consumer, client, and employee data in accordance with national laws and industry codes.
 8. We will not knowingly create work which contains statements, suggestions, or images offensive to public decency and will consider the impact of our work on minority segments of the population, whether that minority be by race, religion, national origin, color, sex, sexual orientation, gender identity or expression, age or disability.
 9. We will not undertake work, which is intended or designed to mislead, including in relation to social, environmental, and human rights issues.
 10. We will not give, offer, or accept bribes, whether in cash or otherwise, to or from any third party, including, but not restricted to government officials, clients, brokers, or their representatives. We will collectively ensure that all staff understand this policy through communication and by example.
 11. We will not offer any items of personal inducement to secure business. This is not intended to prohibit appropriate entertainment or the making of occasional gifts of minor value.
 12. We will not accept, for our personal benefit, goods or services of more than nominal value from suppliers, potential suppliers, or other third parties.
 13. We will not have any personal or family conflicts of interest within our businesses or with our suppliers or other third parties with whom we do business.
 14. No corporate contributions of any kind, including the provision of services or materials

for less than the market value, may be made to politicians, political parties, or action committees, without prior written approval.

15. We will continue to strive to make a positive contribution to society and the environment by:
 - i. Maintaining high standards of marketing ethics;
 - ii. Respecting human rights in our business, supply chain, and through our client work;
 - iii. Respecting the environment;
 - iv. Supporting community organizations;
 - v. Supporting employee development; and
 - vi. Managing significant sustainability risks in our supply chain.

16. We will obtain all relevant environmental authorizations, including for waste and emissions and will endeavor to prevent pollution by implementing conservation measures in all facilities and processes by recycling, reusing, and substituting materials.

17. We will consider the potential for clients or work to damage the Company's reputation prior to taking them on. This includes reputation damage from association with clients that participate in activities that contribute to the abuse of human rights.

We confirm that we adhere to the Business Code of Conduct as amended for our organization. If we become aware of any breaches, particularly in respect of bribery or inappropriate gifts or services to or from your organization or any other third party, or in respect of other matters that could harm the Company's reputation directly or by association, we will inform you immediately.

Name: _____

Position: _____

Organization: _____

Signature: _____

Date: _____