

## **SUPPLIER CODE OF CONDUCT**

### **Our Approach to Social Compliance**

Flying Tiger Copenhagen is the brand name of the Danish retailer Zebra A/S. Our concept is to sell quirky design products of great quality at favourable prices, through Flying Tiger Copenhagen stores across Europe, the Middle East and Asia. Our assortment covers more than [7,000] decorative, practical and colourful items.

We believe responsible practices in sourcing our products and services are critical for the success of our company, to protect our brand and advance better social and environmental conditions in global supply chains. This means that all our products must be produced under humane and responsible conditions, and in respect of international social, environmental and ethical standards. This commitment to responsibility has implications for how we source our products and therefore we believe in cooperation and dialogue with our suppliers on compliance with this Supplier Code of Conduct.

#### Application of this Code

The Zebra A/S Supplier Code of Conduct (hereafter 'Code') applies to all entities with whom Zebra A/S has a commercial relationship, public or private enterprises, including:

- agents and intermediaries
- distributors
- factories manufacturing, finishing or packing products for Zebra A/S
- service providers, including logistics, shipping, facility management, employment and recruitment

hereafter referred to as a 'Supplier'. Even if the primary commercial relationship is with the Supplier, the Supplier is responsible for ensuring that the provisions of this Code extend to its suppliers as well, namely:

- factories manufacturing, finishing or packing products for Zebra A/S
- subcontractors
- homeworkers
- employees employed directly and indirectly by our suppliers, including contractor, seasonal, temporary and part-time workers.

Each Supplier shall ensure that its suppliers sign and deliver Exhibit 1 to the Supplier confirming that such supplier will abide by this Code.

### **Special provisions for traders, agents and intermediaries**

We rely on a network of traders, agents and intermediaries to source our products from various factories or producers in different locations in the world. This means we cannot always directly check on manufacturers of our products and this obligation sits with our agents as part of their own corporate responsibility. The responsibilities of agents and intermediaries are as follows:

- Ensure that their suppliers, factories and subcontractors who are manufacturing, finishing or packing products for Zebra A/S know, have agreed to (by signing **Exhibit 1**), and can comply with this Code. Agents, traders and intermediaries must guarantee that no zero-tolerance issues are present at any manufacturing site linked to our products. This will entail having a due diligence system on social compliance including but not limited to:
  - understanding of the social and ethical risks of own sourcing process and Zebra A/S requirements;
  - allocating, when necessary, organisational resources for social compliance;
  - mechanisms for factory or producer evaluation, such as risk screening, self-assessments and auditing;
  - procedures for management and resolution of social compliance issues in own supply chain, including training of selected suppliers;
- Be able to share information about the origin of the products and the manufacturing sites, including subcontractors. This information will be used either for product safety, quality or social compliance requirements and must be correct and updated. Manufacturing takes place only in permitted countries and changes in sites shall always be communicated.
- Facilitate and ensure Zebra A/S's auditing activities at factories, sub-suppliers and subcontractors including ensuring commitment in handling improvement plans. In relevant cases, agents and intermediaries will be requested to bear the financial cost of remedial actions and re-auditing and must guarantee access to the factories and facilities of its sub-suppliers and subcontractors.
- Ensure that its suppliers, factories and subcontractors sign and deliver **Exhibit 1** to the it, confirming that they will abide by this Code.

We will as part of on-boarding and on an ongoing basis offer guidance to our agents, traders and intermediaries during our commercial relationship, as we recognize that social responsibility is a process that can take time. We encourage our agents, traders and intermediaries to become members of social compliance initiatives such as Sedex, BSCI, ICTI, GoodWeave, WRAP, SA8000, Ethical Trading Initiative, and similar.

## Requirements

This Code specifies the ethical requirements that Suppliers of Zebra A/S must comply with. The provisions that follow are derived from international declarations, conventions and frameworks such as the Universal Declaration of Human Rights, the Core Conventions of the International Labour Organisation (ILO), the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the UN Global Compact's 10 Principles, and the United Nations Convention Against Corruption.

We expect Suppliers to have in place appropriate management systems that can support implementation of this Code. This includes effective due diligence procedures to detect, prevent and mitigate any adverse impacts related to corruption, human rights, labour rights, occupational health and safety, and the environment. These procedures are required for all groups, individuals and entities that the Supplier's activities may impact, within all business and production units, the local community and the external environment. Policies within all relevant areas such as health and safety, human resources and the protection of the environment must be clearly defined and communicated to all workers and other relevant stakeholders. Procedures and management systems must be in place to ensure that such policies are adhered to at all times.

By signing this Code, the Supplier agrees that it will comply with the Code, as updated from time to time. The current version of this Code can be found on our website.

### 1. Ethics and Compliance

All our Suppliers are expected to comply as a minimum with all applicable laws, including antitrust and intellectual property laws, and relevant international laws and industry standards. In case of conflict between local legal provisions and this Code, the most stringent standard should apply.

Suppliers shall act with integrity in all matters related to conducting their business and have adequate procedures to prevent corruption in their operations, as Zebra A/S could be prosecuted for these offences under the UK Anti-Bribery Act and other legislations.

**Zero Tolerance** No form of corruption, extortion, kickbacks, facilitation payments or bribery shall be offered, received or promised.

### 2. Human rights and Labour

We expect all our Suppliers to respect internationally recognized human rights and to implement policies and due diligence procedures to detect, prevent and mitigate any adverse impacts on human rights.

**Zero Tolerance** **Child labour and young workers**  
Suppliers shall not use or exploit child labour. No person shall be employed in manufacturing or other services at an age younger than 15, even if local legislation allows for lower limits. Young workers between 15 and 18 years may only be employed to carry out light work at reduced

working hours, with tasks that do not interfere with their physical and mental development and education.

**Zero Tolerance**

**Forced labour**

Employment must be freely chosen. Suppliers shall not engage in or support the use of forced, bonded, prison, or involuntary labour or human trafficking. All employees must have written and legal employment letters and not be subject to recruitment fees or deposits, forced overtime, lodging of personal documents by the employer, limited freedom of movement.

**Zero Tolerance**

**Discrimination**

Suppliers shall not engage in or support any form of discrimination in hiring, remuneration, access to training, promotion, termination or retirement based on race, caste, national origin, migrant status, religion, disability, gender, parental status, sexual orientation, membership to workers' organizations, political affiliation, or age.

**Workers' associations**

Suppliers shall respect their workers' right to freedom of association, including to form or join associations of their own choice and bargain collectively on all work-related issues. In cases where local law restricts this right, parallel means of free association should be allowed. No employees should be discriminated on grounds of union membership.

**Zero Tolerance**

**Disciplinary practices**

Sexually coercive, threatening, abusive or exploitative behaviour is strictly forbidden. Suppliers shall not engage in or support the use of corporal punishment, threats of violence, mental or physical coercion, or verbal or sexual harassment.

**Employment practices**

All employees, regardless of if employed on a permanent, temporary or casual basis, shall be provided with written employment letters, specifying conditions of employment and termination.

**Working Hours and Leave**

The maximum regular working week shall not exceed 48 hours, and weekly overtime not exceed 12 hours. Workers shall have the right to a minimum of one day off per week. Maternity, paternity and/or co-parent and sick leave, holiday and time off shall be provided to all workers in accordance with applicable legislation, local traditions and standards.

**Compensation**

All employees shall be entitled to fair and equal compensation, which at least meets the legal minimum wage, industry standards or negotiated wages and includes all legally mandated benefits (medical insurance, social insurance, pension). For piece-rate workers, their working day shall

give at least the equivalent of a minimum day-wage. All overtime work shall be compensated at a premium rate according to legal requirements.

**Zero Tolerance** Deduction in wages shall not be used as a disciplinary practice.

### 3. Occupational Health and Safety

A healthy, safe and hygienic work environment shall be provided for all employees and to comply with all applicable laws on occupational health and safety and industrial hygiene. All Suppliers shall have procedures and capabilities in place to ensure a safe workplace and prevent, address and mitigate health and safety risks, including but not limited to:

- a. Management representatives appointed for safety.
- b. Incident and risk management procedures proportionate to the type of business.
- c. Health and safety training for relevant employees to carry out their job safely; emergency and fire training; training in handling hazardous materials, chemicals and dangerous goods.
- d. Provision of the appropriate personal protective equipment (PPE), free of charge and in good condition to all employees. PPE training shall be provided.
- e. All premises on site, including company-provided dormitories, restrooms, changing rooms and canteen, shall uphold the highest hygienic and health and safety standards.

**Zero Tolerance** We will not accept exposure of workers to a working environment which compromises their health and safety, or where adequate protective measures have not been taken.

### 4. Environmental Management

Suppliers are expected to comply with all local, regional and international environmental laws and regulations, and in doing so obtain and maintain the necessary registrations, permits and licences. Suppliers shall have procedures and capabilities in place to ensure that they prevent and mitigate all negative environmental impacts from their activities, or associated activities, including but not limited to:

- a. Identification and management of environmental impacts.
- b. Waste management and disposal procedures compliant with industry and customer requirements.
- c. Chemical management and labelling, including Material Safety Data Sheets (MSDS) procedures and training for all relevant employees.
- d. Minimisation of waste, air, water, noise pollution and dust emissions.
- e. Responsible sourcing of raw materials and animal product, in respect of customer requirements.

**Zero Tolerance** Severe pollution to water, air, soil or nearby communities caused by a Supplier's activities.

## **Collaboration and monitoring**

We believe that open and transparent communication regarding our ethical requirements is vital for the success of the business relationship between Zebra A/S and its Suppliers. We evaluate our Suppliers' social performance and we prioritize doing business with those Suppliers who are committed to compliance with this Code and can show solid ethical, social and environmental practices – while delivering at the same conditions.

We reserve the right to monitor our Suppliers' compliance with this Code through self-assessments, and announced or unannounced audits of manufacturing, assembly and storage facilities, carried out by our internal auditors or externally appointed auditors. In these cases, Suppliers are obliged to grant access to all facilities, including subcontractors and their factories and facilities, documents, and employees as requested by us or our auditors. In certain cases, we apply the principle of mutual recognition by accepting social compliance evaluations by other companies or initiatives.

## **Failure to respect this Supplier Code of Conduct**

We trust that our Suppliers will in good faith embrace the requirements of this Code. However, in case of failure to respect the provisions and principles of this Code, Suppliers must be committed to correct non-compliances within a specific timeframe. We believe that achieving good social and ethical standards is a process and therefore we are committed to working together with our Suppliers in their efforts. However, if a Supplier does not show sufficient commitment to this Code, we will not hesitate to terminate the business relationship.

This Code also outlines a number of Zero-Tolerance issues. If we witness severe or repeated violations of this Code, such as use of Child Labour, Forced Labour, Human Rights abuses, work environments unfit for labour, and bribery, we will immediately put orders on hold, halt production, cancel future orders and terminate our business relationship with the Supplier and/or the factory.

## **Grievances**

Violations of this Code and applicable laws can be brought by any interested party to our attention by writing to this address: [csr@flyingtiger.com](mailto:csr@flyingtiger.com).

## **Commitment**

***Please arrange for this page to be signed by authorized representative(s) and return to your contact person at Zebra A/S.***

We hereby confirm that we have received, read and understood the Zebra A/S Supplier Code of Conduct (the 'Code') and understand the importance of compliance to this Code by ourselves, our suppliers and subcontractors.

- We commit to adhere to all provisions in the Code, and accept that Zebra A/S is entitled to cancel orders and terminate the business relationship in case of failure to comply.
- We also accept that Zebra A/S, and/or anyone representing Zebra A/S, is entitled to evaluate via questionnaires or on-site social audits all relevant facilities at any time, announced or

unannounced, in order to monitor compliance with this Code. We shall also ensure that Zebra A/S and/or anyone representing Zebra A/S, is granted access to such facilities at any time, announced or unannounced.

- We confirm that we will promptly provide upon request the correct and true information and/or documentation regarding all products, manufacturing, assembly and storage sites.
- We understand that open and transparent communication on all issues related to the provisions of this Code is a requirement for doing business with Zebra A/S. We understand that falsification of records, factory names, certifications will cause termination of the business relationship with Zebra A/S.
- We understand that the Zebra A/S' Supplier Code of Conduct is updated on a regular basis and it is our responsibility to keep ourselves up to date with the latest version that is available on [hyperlink].

Name of Company

Main Address

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Place:

Date:

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Name:

Name:

Title:

Title:

**EXHIBIT 1**

**Commitment from sub-supplier**

***Please arrange for this page to be signed by authorized representative(s) and return to your contact person at [Name of Supplier whom Zebra A/S has a commercial relationship with].***

- We hereby confirm that we have received, read and understood the Zebra A/S Supplier Code of Conduct and understand the importance of compliance to this Code by ourselves, our suppliers and subcontractors.
- We commit to adhere to all provisions in the Code.
- We also accept that Zebra A/S, and/or anyone representing Zebra A/S, is entitled to evaluate via questionnaires or on-site social audits all relevant facilities at any time, announced or unannounced, in order to monitor compliance with this Code.
- We confirm that we will promptly provide upon request the correct and true information and/or documentation regarding all products, manufacturing, assembly and storage sites.
- We understand that open and transparent communication on all issues related to the provisions of this Code is a requirement for doing business with Zebra A/S. We understand that falsification of records, factory names, certifications will cause termination of the business relationship.
- We understand that the Zebra A/S's Supplier Code of Conduct is available on the Zebra A/S' website and it is our responsibility to keep ourselves up to date with the latest version that is available on [hyperlink].

Name of Company

Main Address

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Place:

Date:

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Name:

Name:

Title:

Title: