

## **Arkay Supplier Code of Conduct**

At Arkay, we are committed to operating with the most ethically and environmentally sound practices plausible, and we encourage organizations in our supply chains to do the same. As part of the commitment, Arkay requires its suppliers to comply with the following Supplier Code of Conduct (henceforth the 'Code'). The Code is also intended to complement Arkay's Sustainable Procurement Policy.

- 1. **Legal Compliance:** Suppliers must commit to meeting all the legal regulations regarding labor and human rights, business ethics, and the environment in the country(ies) where the product is manufactured and distributed.
- 2. *Human Rights:* Arkay suppliers shall treat their employees with dignity and respect. Engagement in any kind of discrimination, harassment, or coercion acts in direct violation of this Code. There must be clear, safe procedures in place for the reporting of acts of discrimination, harassment, and coercion, as well as clear procedures in place for investigation and penalization of these acts.
- 3. Ethical Practices and Anti-Corruption: Arkay has a zero-tolerance policy for corruption or bribery. Suppliers are prohibited from offering bribes of any nature to buyers. Suppliers are expected to have procedures in place to prevent money laundering, fraud, bribery, corruption, conflicts of interest, data and information security incidents, and violations of antitrust.
- 4. *Labor Rights:* Suppliers must not tolerate any form of modern slavery and human trafficking which includes forced labor and child labor. Suppliers must have policies in place demonstrating their compliance with the minimum employment age limit defined by national law or by International Labor Organization ("ILO") Convention 138, whichever is higher. All workers must be paid at least the legal minimum wage of their country of operation and treated fairly. All workers must not work more hours in one week than allowable under applicable laws or 60 hours per week, whichever is less. All workers must receive 24 hours rest within a time frame of 7 consecutive days.
- 5. Worker Health and Safety: Arkay employees identify safety as their number one job. Therefore, Arkay suppliers also must ensure that their workers are provided with healthy, safe, and clean work environments. workers are provided with healthy, safe, and clean work environments. This includes, but is not limited to: 1) Access to appropriate personal protective equipment (PPE) where necessary, at no cost to the employee; 2) Access to information regarding to, and enforcement of, proper use of PPE; 3) Appropriate safety training for the use of potentially dangerous equipment and hazardous materials; 4) Adequate lighting, heating, and ventilation in all workspaces; 4) Access to potable drinking water, clean toilet facilities, emergency medical care and first aid equipment for all employees; 4) Clear procedures for accident and incident reporting; 4) Evacuation plans and drills, clearly marked fire escapes and safety exits, and easily accessible fire

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extinguishers in place at all facilities; 5) Indoor smoking prohibited in all indoor facilities; 6) Equipment and infrastructure must be inspected regularly and maintenance when needed.

- **6. Material Safety**: Suppliers must use safe materials. Any purchased material may not contain substances of very high concern (SVHC). Hazardous or potentially hazardous ingredients in any potentially procured material (wood based or otherwise) must be reported and must be present below 100 ppm.
- 7. **Environment:** Arkay commits to only purchasing wood-based products from suppliers that can offer third-party certified wood products by the Forest Stewardship Council (FSC), Programme for the Endorsement of Forest Certification (PEFC), Sustainable Forestry Initiative (SFI), or other similar certifications. Additionally, Suppliers are expected to share up to date ESG performance data, including but not limited to, annual Greenhouse Gas Emissions inventories for Scope 1 (Direct Emissions) and Scope 2 (Indirect Emissions from Purchased Energy) with Arkay upon request.
- **8.** Freedom of Association and Collective Bargaining: Arkay suppliers must recognize the right of employees to freely associate and must comply with all local laws governing the right of employees to select, or not select, workplace representatives.
- **9. Communication:** Arkay suppliers must make all reasonable efforts to communicate the Arkay Supplier Code of Conduct to workers and allow workers to have the opportunity to make questions and complaints under the code.

Violations, questions, or concerns in regard to this Code of Conduct can be directed to:

General Manager

Arkay

(540)-977-3031 Ext. 3108

If a supplier is found in non-compliance of this Code of Conduct, Arkay reserves the right to develop and implement a corrective action plan with the supplier or to terminate business with said supplier.

Any potentially new suppliers must demonstrate compliance, or agreement to comply, with the Supplier Code of Conduct before partnership can commence.

Arkay thanks you for your support of our Supplier Code of Conduct. We will review compliance on an annual basis.

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Please sign below to demonstrate compliance with Arkay's Supplier Code of Conduct:

Supplier Name:
Signature:
Name:
Job Title:
Email:
Date:

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