



Dear Valued Supplier,

At Arkay, we are committed to operating with the most ethically and environmentally sound practices plausible. As part of this commitment, Arkay requires its vendors and suppliers to comply with the following Supplier Code of Conduct and to annually complete our Supplier Questionnaire (Form 100-011). This Code is also intended to complement the Arkay Sustainable Procurement Policy as related the Supplier Code of Conduct (SOP 100-011), and Supplier Code of Conduct Agreement (Form 100-008).

1. **Legal Compliance:** Arkay is committed to conducting business with the highest ethical and legal requirements. These include local and national laws and regulations, as well as the laws and regulations in the countries where we do business.
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.
3. **Ethical Practices and Anti-Corruption:** Arkay employees are prohibited from offering gifts or bribes of any stature to buyers to inappropriately influence internal or external business decisions. Arkay suppliers are likewise prohibited from doing the same to prevent unfair advantages for suppliers. Arkay has a zero tolerance policy for corruption or bribery.
4. **Labor Rights:** Arkay will not tolerate any form of forced, compulsory or child labor and suppliers must adhere to the minimum employment age limit defined by national law. All workers must be paid at least the legal minimum wage of their country of operation, and treated fairly.
5. **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.
6. **Environment:** Arkay strives to meet or exceed local and national environmental laws and regulations. At the minimum, Arkay suppliers must comply with the local environmental laws and regulations of their country of operation.
7. **Freedom of Association:** 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.
8. **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.



9. Commitment to Product Safety, Product Traceability, Hazard Analysis and Risk Assessment (HARA) and good manufacturing practices (GMP), if applicable:

Based on risk-based justification, Arkay vendors and suppliers acknowledge their commitment to product safety, quality, and legality to clearly allocate and understand to their management and employees. Arkay vendor and suppliers are to have a product traceability system in place, and tested at predetermined frequency, at least annually, to ensure that customer can identify a product or production lot number for the product produced. If applicable, vendor and supplier is to have a HARA program in order to include all their products and processes, which include the intended scope of certification. If applicable, Arkay vendor and suppliers are to have a good manufacturing practice (GMP) system for ensuring that products are consistently produced and controlled according to quality standards.

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

General Manager

Arkay

(540)-977-3031 Ext. 3108

If a vendor or 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 vendor or 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.

Sincerely,

Arkay

Vendor/Supplier Name: _____

By: _____

Name: _____

Title: _____