

Centurion Safety Products & Supplier Code of Conduct

INTRODUCTION

CENTURION Safety Products (CSP) is committed to conducting its business in an ethical, legal and socially responsible manner. This commitment extends to the suppliers with whom we choose to do business. CSP expects the same level of honesty and integrity of its supplier partners that it expects of its own employees. To clarify the exact nature of these expectations, CSP has prepared this Supplier Code of Conduct which applies to our own manufacture as well as all suppliers. Compliance with this Code is expected of all suppliers as the actions of those with whom we do business may be attributed to CSP and potentially adversely affect CSP's reputation. CSP reserves the right to periodically inspect suppliers and their facilities to verify compliance with this Code.

All suppliers are expected to take all appropriate steps necessary to ensure compliance with this Code. Suppliers are also expected to be familiar with the business practices of their suppliers and any sub-contractors to ensure that they operate within the guidelines of this Code.

1) COMPLIANCE WITH LAWS AND REGULATIONS

CSP and Suppliers are required to abide by all laws, regulations and standards applicable to its industry under the national laws of the countries where the Supplier is doing business. Should the legal requirements and the standards of the industry conflict, the Supplier must comply with the laws of the country in which the products are being manufactured. Suppliers should, however, strive to meet industry standards whenever possible. If state or local legal requirements apply to the Supplier's manufacturing activities, the Supplier must comply with the state and local requirements.

2) EMPLOYMENT PRACTICES

CSP respects its employees and expects Suppliers to respect its employees and to strive to improve conditions whenever possible, but in all instances to be in compliance with the specific requirements relating to employment conditions contained herein.

Disciplinary practices shall be fair and appropriate and must be clearly set out and communicated to the workers.

Wages and Benefits: CSP and Suppliers shall provide wages, overtime compensation and benefits at not less than the minimum levels required by applicable laws and regulations or which are consistent with the prevailing local industry levels, whichever is higher.

Working Hours: CSP and Suppliers shall maintain employee work hours in compliance with local standards and applicable laws of the jurisdictions in which the Suppliers are doing business. Unless the national law is different, the maximum standard working time is 48 hours per week or 60 hours per week including 12 hours of overtime work. Unless and except extraordinary circumstances are

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present, no worker shall work more than 72 hours per 6 days; work more than 14 hours per calendar day (midnight to midnight); or work 7 consecutive days without one day off. CSP will not use Suppliers who regularly require workers to work hours in excess of the statutory requirements.

Child Labour: CSP respects the right of children to development and education. Exploitation of child labour or any vulnerable group (illegal immigrants for example) is totally unacceptable. No person shall be employed at an age younger than the legal minimum age for working in any specific country and in no circumstance, shall any worker be younger than 14 years of age. In general, all children under the age of 18 must:

- not be employed in hazardous work
- not work night shifts
- are entitled to more breaks than adults.

Forced Labour: Forced or involuntary labour will not be tolerated by CSP. CSP and Suppliers shall maintain employment on a voluntary basis. CSP will not work with Suppliers who directly or indirectly use in any manner forced labour or prison labor.

Workers must not be obliged to lodge identity papers or pay any deposit as a condition of work and must be free to leave their employer upon reasonable notice.

Non-discrimination/Human Rights: CSP recognises that cultural differences exist and different practices apply in various jurisdictions. However, CSP believes that all terms and conditions of employment should be based on an individual's ability to do the job, not based on physical characteristics or beliefs. Employees of our Suppliers must not be exposed to physical punishment, threats of violence or physical, sexual, psychological or verbal harassment or maltreatment.

Freedom of Association: CSP and Suppliers must recognise their employees' rights to choose whether to associate with or establish any organisation including labour organisations.

Working Conditions: CSP and Suppliers must provide adequate working conditions for employees and comply with all applicable worker Health and Safety laws and regulations. At a minimum, adequate working conditions include:

- Access to sanitation, drinking water and emergency exits
- Safety procedures for hazardous activities and accident prevention
- Proper maintenance of all machinery
- Provision of meal breaks
- Adequate ventilation, temperature controls and lighting
- Living accommodation, where provided, must be in buildings that are separate from other areas of the workplace and have adequate fire alarm systems
- Suppliers must establish an active Health and Safety Committee and appoint a senior manager to be responsible for Health and Safety

3) ENVIRONMENTAL

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CSP and Suppliers shall comply with all applicable environmental laws and regulations. This shall include having processes in place to ensure compliance with those regulations relating to the handling, recycling, and disposal of dangerous or hazardous materials.

4) ETHICAL BUSINESS BEHAVIOUR

CSP and Suppliers shall not be involved in any act of corruption, extortion or embezzlement, nor in any form of bribery, including, but not limited to, promising, giving or accepting any improper monetary or other incentive.

Accurate business information must be kept regarding activities, structure and performance. Any collection or use of personal information must be carried out with reasonable care and any collection of personal information must comply with privacy and information security laws and regulatory requirements.

5) DATA PROTECTION

CSP and Suppliers shall lawfully comply in the processing, management, storage and retention of data in conjunction with the General Data Protection Regulation (GDPR). CSP and Suppliers must be able to exercise the rights of its data subjects.

6) MONITORING OF THE SUPPLIER CODE OF CONDUCT

CSP will review this Supplier Code of Conduct on a regular basis and will revise it to incorporate additional parameters when necessary. Suppliers are invited to contribute towards the further development of the Code of Conduct.

Suppliers shall actively audit and monitor the day-to-day management processes to ensure compliance with this Code of Conduct and assure that employees are advised of the requirements of this Code. Suppliers are also required to disclose all material facts relating to production of products for CSP upon request.

This Code is a general statement of CSP's expectations with respect to its Suppliers. The Code should not be read in lieu of, but in addition to the Supplier's obligations as set forth in any agreements between CSP and the Supplier. In the event of a conflict between this Code and any such agreement, the agreement shall control.

By entering into an agreement with Centurion, Suppliers hereby agree to and accept the terms of this code.

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