**CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT**

At **ViberTEX, Inc.**, we believe everyone should be treated with fairness, dignity and respect. We are a privately-held, family-owned company seeking to promote and advance respect for human rights across our value chain - from farms, to our suppliers’ factories, to our own workplaces right to the end customer. Although the California Transparency in Supply Chain Acts requires compliance for retailers and company’s reporting revenues above $100 million to comply, ViberTEX, Inc. believes in the Act and its requirements. We are not required to comply, but we are using the principles of the ACT to enforce our suppliers who are above the threshold of $100 million to comply.

For over the past 7 years, ViberTEX, Inc. has engaged in various Supplier and Manufacturers across the globe and domestically. We have been transparent in our dealings with our suppliers, 3rd party vendors, manufacturers and distributors. We will continue to ask for the Supplier California Transparency in Supply Chains Act to our Suppliers, Distributors and Manufacturers.

There is nothing better than keeping the Quality, Responsibility, Mutuality, Efficiency and Transparency in Agreements to ensure the correct services and products are provided to our end customers.

We work with our supplies, 3rd party vendors, distributors and manufacturers on a principles-based approach to business, and we expect our suppliers to respect human rights in their workplaces.

Our [global human rights approach](https://www.mars.com/sustainability-plan/thriving-people/promoting-human-rights) includes efforts across our own workplaces, our suppliers and extended supply chains. We are introducing the Supplier Code of Conduct, Supplier Human Rights by validating their workforce,.

Our **Supplier Code of Conduct** is informed by the International Bill of Human Rights, the principles set forth in the International Labor Organization’s 1998 Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights. It describes the human rights standards we expect our first-tier suppliers to uphold, covering forced labor, including modern forms of slavery. The Code prohibits the use of all forms of forced labor, including any form of prison, trafficked, indentured or bonded labor. The following areas are included in the Code:

* Child Labor
* Compensation & Benefits
* Discrimination
* Environment
* Ethics
* Forced Labor
* Freedom of Association
* Health & Safety
* Issue Reporting
* Work Hours

**1. VERIFICATION OF SUPPLY CHAINS**

We use publicly available data from third party sources such as the U.S. Department of Labor, United Nations Development Program, public media and civil society reports, and proprietary analysis provided by Verisk Maplecroft’s team of human rights risk analytics experts, to assess the social and environmental risks associated with our supply chains. Forced labor and related risks are included in this analysis. This risk assessment and verification helps us determine the actions expected of specific suppliers, which could include a range of efforts, such as completion of a site-specific, third-party validated assessment or a longer-term collaboration as suppliers activate plans to address targeted issues in their workplaces when we work with international suppliers.

Suppliers are expected to respect rights in their workplaces, and they have an important role in promoting responsible sourcing policies and principles in their own supply chains. As part of our commitment to building supplier capability, we periodically engage suppliers in training and awareness raising to drive continuous improvements.

**2. AUDITS OF SUPPLIERS**

We evaluate human rights risks associated with operating in specific geographies or purchasing specific commodities and services. We engage with relevant suppliers to assess how they manage these risks and their implementation of the expectations set forth in our Code.

In 2019, we started our Supplier Code of Conduct and we request Supplier Validation and Certification that they are abiding by the rules and regulations as stipulated in our Supplier Policies.

* We continue to **align** all of our suppliers with our social, environmental and ethical expectations through our Supplier Code of Conduct.
* Our Code is a key part of our engagement with our suppliers, distributors, manufacturers and 3rd party vendors.
* Our prioritized list of suppliers are selected based on risk and relevance - will complete the personal validation and certification that they are benchmarked on for process, receiving a performance score and the opportunity to receive customized advice, guidance and support from a third party as they take steps to improve or maintain their scores.
* With these insights, our suppliers can strengthen their management systems to address social, environmental and ethical performance. The Supplier Program helps us achieve our goal of working with suppliers that share our values and commitments, and ceasing work with those who are unable or unwilling to meet our expectations.

**3. CERTIFICATION BY SUPPLIERS**

We expect our suppliers to align with our Code of Conduct, including its provisions on forced labor. Supplier program expectations are outlined in our Code of Conduct are to be included as part of our agreements with suppliers. Under the Code, suppliers are also expected to comply with applicable laws and regulations, which include any laws related to forced labor, including modern slavery and human trafficking.

As outlined in our Code, to identify whether a supplier is in compliance with our Supplier Code of Conduct, ViberTEX, Inc. may “request suppliers to complete self-assessments, disclose relevant policies or procedures, or to be subject to announced and unannounced on-site direct and/or third-party audits or evaluations of the supplier’s facilities, including housing provided by the supplier or labor providers, and workplaces to which the supplier has sub-contracted production of procured products. ViberTEX, Inc. reserves the right to audit the operations, records, policies, and procedures of the aforementioned entities and to conduct confidential worker interviews in connection with such audits or evaluations as appropriate and as agreed. Upon request, distributors, brokers and agents supplying to ViberTEX, Inc. will also provide ViberTEX, Inc. with access to the workplaces, records, policies, procedures, and workers of their first-tier suppliers.”

**4. INTERNAL ACCOUNTABILITY**

Our Code of Conduct describes the human rights standards we expect our first-tier suppliers to uphold, covering forced labor, including modern forms of slavery. The Code prohibits the use of all forms of forced labor, including any form of prison, trafficked, indentured or bonded labor.

ViberTEX, Inc. reserves the right to not initiate, to suspend or to terminate its relationship with a supplier if the supplier refuses to consent to the expectations set forth in the Supplier Code of Conduct or to take the appropriate steps to come into compliance with the expectations in the Supplier Code of Conduct, including its provisions on forced labor.

Moreover, ViberTEX, Inc. has our own internal programs where we maintain internal accountability standards and conduct assessments to ensure that ViberTEX, Inc. sites are complying these standards. These standards are consistent with the expectations in our Supplier Code of Conduct.

**5. TRAINING**

Guidance on our Code of Conduct is available to our suppliers and to our Associates, including good practice implementation examples. We ask our suppliers when they would like their training and for how many people.

Our internal framework for learning and development opportunities provided to ViberTEX, Inc. includes a Supplier Code of Conduct course that is required for specific Suppliers in certain GEO areas and our 3rd Party Vendors & Associates if they are making more than $100 million dollars a year in revenue.

All of our procurement Associates are expected to furnish us with their California Supplier Transparency Act and attend or show proof of their Supplier training course. The content must include: human rights standards and expectations, including with regard to forced labor. Additionally, ViberTEX, Inc. can provide you with compliance training and or provide you a 3rd party that can help you get compliant. We have policies and procedures that you can follow and roll out as well.

Our team of consultants can provide you global human rights policies, strategies and programs, and provides expertise and guidance to colleagues around the world who are engaged in this work. To govern the application and implementation of our policies, our Human Rights Steering Committee meets regularly to review our progress and opportunities. Our Board of Directors is informed annually of our human right plans and performance.

ViberTEX, Inc. is a consulting firm, but also has several software systems that it has launched and any suppliers or manufacturers must comply to the Act as outlined in this page when they related to: manufacturing supplier responsible sourcing practices and supplier capability building across the industry.

For more information on the California Supplier Transparency Act, please contact us

**VIBERTEX, Inc. SUPPLIER CODE OF CONDUCT GUIDANCE:**

Supplier Code of Conduct Our business philosophy, which is deeply rooted in the ViberTEX, Inc.

Five Principles, leads us to work with suppliers who are willing to meet our standards and specifications and are committed to values that are compatible with our own.

Our Supplier Code of Conduct is informed by the International Bill of Human Rights, the principles set forth in the International Labor Organization’s 1998 Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights.

This document, and related guidance, establishes expectations of ViberTEX, Inc. suppliers with regard to business practices, including their approach to human rights, the environment, and ethical practices aligned with legal requirements, the ViberTEX, Inc. Incorporated Human Rights Policy, other relevant ViberTEX, Inc. policies, and international good practice. All ViberTEX, Inc. suppliers, defined as third parties with whom ViberTEX, Inc. has active commercial relationships for the supply of goods or services, are expected to apply this Supplier Code of Conduct as follows:

**Child Labor**

• All forms of unlawful employment or exploitation of children are prohibited.

• No individuals are hired under age 16 or under the legal age of work or compulsory schooling, whichever is higher. This guidance is subject to exceptions recognized by the International Labor Organization.

• Individuals under 18 years of age are not hired for positions that include hazardous work or that interfere with normal educational activities.

• Where applicable, child protection measures are in place to ensure that children suffer no harm, exploitation, or abuse as a result of the activities of workers in the workplace or in employer-provided housing or transport. Compensation & Benefits

• All legally mandated wages and benefits are provided.

• Payment is made on time and on at least a monthly basis.

• Deductions are not taken from pay as punishment.

• Itemized records are maintained, consistent with this standard, and transparent pay information is provided in a timely manner.

• Pregnancy, maternity and lactation benefits, including relevant protections, leave, and accommodations, are provided in accordance with the law.

**Discrimination**

• Discrimination or harassment in hiring, pay, promotion, or in the workplace on the basis of race, color, sex, national or social origin, religion, age, disability, sexual orientation, marital status, pregnancy status, gender identity or any other status protected by applicable law is prohibited.

• All forms of abuse or harassment in the workplace is prohibited. Environment

• Compliance with applicable environmental laws, particularly with regard to waste, air and water.

• All required environmental permits for use and disposal of water and waste are obtained.

• Legal title to or a legal lease for its land is obtained, and there are no indications that the supplier’s right to own or lease that land is contested.

**Supplier Code of Conduct**

• The supplier complies with all applicable laws, including those pertaining to bribery, corruption, or any type of fraudulent business practice. Ethics Forced Labor

• All forms of forced labor are prohibited, including any form of prison, trafficked, indentured or bonded labor.

• Original personal identification and travel documents are not retained, and freedom of movement is not restricted.

• Workers are not charged or required to pay fees or deposits to obtain or maintain employment. Pay is not withheld, and no conditions are present that constrain a worker’s ability to freely choose employment.

• Accurate and understandable information regarding the nature of work, compensation, work hours, and benefits is provided in writing in advance of employment. Freedom of Association

• The right to join, not join, or form a labor union in accordance with the law is respected without fear of reprisal, intimidation, or harassment.

• Where workers are represented by a legally recognized union, the supplier is committed to establishing a constructive dialogue with the union’s freely chosen representatives and bargaining in good faith with such representatives. Health & Safety

• A safe and hygienic workplace is provided in compliance with the law, and systems are in place to detect and manage potential risks to workers.

• Workers undertake health and safety training, hazardous materials and chemicals are properly stored, and workers are provided with the appropriate personal protective equipment.

• Health and hygiene of workers is provided for as relevant at the site, including toilet facilities, access to drinking water and food safety.

• Unreasonable restrictions are not be placed on workers’ toilet, rest or lactation breaks.

• Employer-provided housing, transportation and food must be sanitary and safe.

**Issue | Incident Reporting**

• Workers will be aware of, and have access to, a supplier-provided complaints mechanism that is transparent, responsive, anonymous, unbiased, and confidential through which they can raise questions about or report violations of supplier policies, expectations contained in this Supplier Code of Conduct, other workplace grievances, or legal or ethical violations.

• Retaliation against workers reporting violations or cooperating in investigations is prohibited. Work Hours

• Regular and overtime working hours are in compliance with the law and take into account worker safety, and overtime is voluntary.

• 24 consecutive hours of rest are provided in every 7 day work period. If allowed by law, 48 consecutive hours of rest in every 14 day work period are permitted.

ViberTEX, Inc. Code of Conduct All suppliers to ViberTEX, Inc. are expected, at a minimum, to comply with applicable laws and regulations.

If the Supplier Code of Conduct establishes a higher standard than is required by applicable law, ViberTEX, Inc. expects its suppliers to apply the Supplier Code of Conduct.

Where alignment with the Supplier Code of Conduct could lead to a conflict with or a violation of applicable laws or regulations, the supplier will notify ViberTEX, Inc. of the situation and explain how it intends to operate in a responsible manner.

Suppliers will have in place appropriate policies, management systems, procedures, and staffing to meet the expectations in the Supplier Code of Conduct.

Suppliers will communicate to workers the standards to which the supplier is committed, as well as relevant laws, regulations and protections. Suppliers will notify ViberTEX, Inc. of any actual or suspected legal infractions, including any legal actions against the supplier by the authorities for violations of human rights, environmental laws, or anti-corruption or bribery laws.

ViberTEX, Inc. reserves the right to request and receive additional information from the supplier with regard to its management of relevant issues.

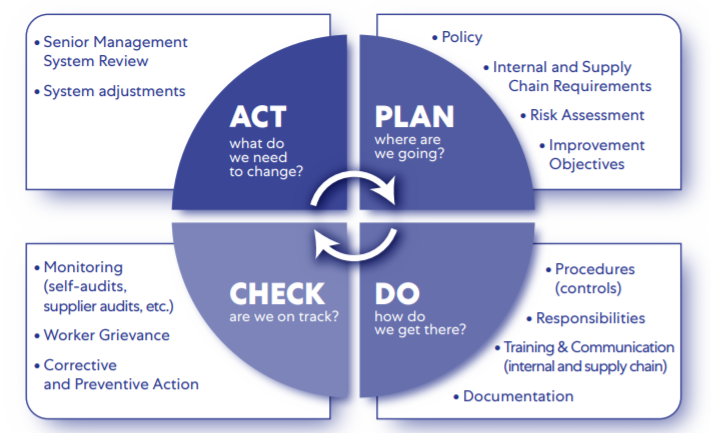
If ViberTEX, Inc. suppliers are distributors, brokers, and agents, they are expected to assure that their first-tier suppliers supplying goods for ViberTEX, Inc. also apply these standards, and to provide this assurance to ViberTEX, Inc. upon request.

Suppliers to ViberTEX, Inc. are expected to provide these partners with assistance in complying with these expectations as needed.

Suppliers are not permitted to sub-contract the production of goods and services for ViberTEX, Inc. without first informing ViberTEX, Inc. in writing and receiving written agreement that this is acceptable to ViberTEX, Inc..

If ViberTEX, Inc. has approved sub-contracting, the sub-contracted workplaces are expected to meet the Supplier Code of Conduct expectations. Suppliers are expected to assure that all vendors providing them with services in their workplace, including the provision of workers, also apply these standards, and to provide this assurance to ViberTEX, Inc. upon request.

Suppliers are expected to provide their vendors with assistance in complying with these expectations as needed. To identify whether a supplier is in compliance with the Supplier Code of Conduct, ViberTEX, Inc. reserves the right to request suppliers to complete self-assessments, disclose relevant policies or procedures, or to be subject to announced and unannounced on-site direct and/or third-party audits or evaluations of the supplier’s facilities, including housing provided by the supplier or labor providers, and workplaces to which the supplier has sub-contracted production of ViberTEX, Inc. procured products.



ViberTEX, Inc. reserves the right to audit the operations, records, policies, and procedures of the aforementioned entities and to conduct confidential worker interviews in connection with such audits or evaluations as appropriate and as agreed. Upon request, distributors, brokers and agents supplying to ViberTEX, Inc. will also provide ViberTEX, Inc. with access to the workplaces, records, policies, procedures, and workers of their first-tier suppliers. If ViberTEX, Inc. identifies areas of noncompliance, ViberTEX, Inc. reserves the right to request suppliers to make the necessary investments in systems and conditions improvements to ensure compliance. ViberTEX, Inc. encourages its suppliers to understand, and take appropriate steps to address, human rights, environmental and ethics issues in their supply chains. Upon request, ViberTEX, Inc. expects its suppliers to share with ViberTEX, Inc. information regarding their relevant supply chain policies and practices, conditions or risks in their supply chains, and how such conditions or risks are being prevented or addressed.

If requested by ViberTEX, Inc. suppliers will disclose to ViberTEX, Inc. information related to their supply chain, including countries of origin of materials used in products supplied to ViberTEX, Inc.

ViberTEX, Inc. reserves the right to disclose this information publicly.

ViberTEX, Inc. in its sole discretion, reserves the right to not initiate, to suspend or to terminate its relationship with a supplier if the supplier refuses to consent to the Supplier Code of Conduct or to take the appropriate 0steps to come into compliance with the Supplier Code of Conduct.

Contact Us for any more information on our Supplier Code of Conduct