

<u>Corporate Divisions</u> GUARDIAN LABORATORIES

Corporate Headquarters 230 MARCUS BLVD. HAUPPAUGE, NY 11788 Mailing Address:
P.O. BOX 18050
HAUPPAUGE, NY 11788
TEL: (631) 273-0900
FAX: (631) 273-0858
E-MAIL: pgc@u-g.com

# Supplier's Code of Conduct

United-Guardian's Supplier's Code of Conduct outlines what United-Guardian Inc requires from you as a supplier with respect to internationally recognized human rights as well as environmental, social and corporate governance standards ("ESG Standards"). We also expect our suppliers to implement these standards with their suppliers and subcontractors. We particularly expect you as our supplier to support, embrace and enact the following ESG Standards.

As a supplier, you must adhere to this Code of Conduct and operate in full compliance with the laws and regulations of all the countries within which you operate. Failure to comply with internationally recognized standards, and the standards set forth in this Supplier's Code of Conduct document may result in the termination of your contract and relationship with United-Guardian Inc.

# Contents

	Page
Environment	2
Social responsibility	3
Governance and Ethics	4
Compliance Statement	6

#### **Environment**

- You comply with all applicable environmental, occupational health and safety laws and regulations and international conventions on environmental standards. All current regulations are followed, and permits must be kept up to date.
- You promote safe and environmentally sound development, manufacturing, transport, use and disposal of your products.
- You ensure by using appropriate management systems that product quality and safety meet the applicable requirements.
- You promptly report quality issues, quality concerns or quality nonconformities of products that were supplied to United Guardian Inc in either error, or in the event that a latent issue, concern or nonconformity was detected after the material was shipped.
- You communicate changes to your product, process and/or service with United-Guardian Inc. Generally, minor changes require prior notification to and major changes require prior approval from United-Guardian Inc.
- You protect your employees' and neighbors' life and health, as well as the general public at large against hazards inherent in your processes and products.
- You use resources efficiently, apply energy-efficient and environmentally friendly technologies to reduce waste, as well as emissions to air, water and soil.
- You prohibit unlawful eviction and unlawful taking of land, forests, and waters.
- You minimize your negative impact on biodiversity, climate change and water scarcity to protect the livelihood of people.
- You reduce the environmental impacts of your operations including natural resource consumption, material sourcing, waste generation, wastewater discharges, air emissions, and prevent accidental releases of hazardous materials into the environment which could have adverse environmental impacts on the local community.

### **Social Responsibility**

- You ensure that you protect internationally proclaimed human rights in your operations and of your employees, and do not directly or indirectly use forced labor (including, but not limited to, modern slavery and human trafficking) and child labor of any kind, or inputs produced using such labor.
- You uphold the freedom of association and the right to collective bargaining in accordance with applicable laws.
- You do not discriminate against employees based on race, color, national origin, religion, gender, disability, sexual orientation or political opinion. Any exclusions or preferences in the work environment made on these bases, which results in impaired equality, are prohibited. Suppliers are expected to hire employees and contract labor based only on each person's job-related competence.
- You treat your employees with respect, promote an inclusive work environment and prohibit discrimination, unequal treatment, harassment, abuse and inhumane treatment against anyone based on the grounds of an individual's ethnic descent or national origin, race or color, religion or ideology, gender, sexual orientation, gender identity and/or expression, age, physical or mental disability, political or union affiliation, citizenship, maternity, marital status, or any other characteristic protected by applicable law. You support these aspects also in the selection of your suppliers and subcontractors.
- You enable your employees and other stakeholders to report concerns or potentially unlawful practices at the workplace.
- You comply with minimum wages and working hours in accordance with local laws and ensure compensation of a living wage according to local living conditions.
- You provide fair treatment to employees and create a work environment free from mental or physical coercion. You do not engage in harsh or inhumane treatment of employees including workplace, sexual, psychological, racial, or religious harassment. Any act creating an intimidating, hostile or offensive work environment is strictly prohibited.
- You ensure that all security forces for the protection of the enterprise comply with applicable laws.

You ensure that you do not supply products that contain conflict minerals
which directly or indirectly finance or benefit armed groups and cause
human rights abuses as outlined in Annex II of the OECD Due Diligence
Guidance for Responsible Supply Chains of Minerals from Conflict Affected
and High-Risk Countries (OECD DDG). We expect you to fulfill your due
diligence on mineral supply chains according to the recommendations
outlined in the OECD DDG.

#### **Governance and Ethics**

- You do not violate antitrust and competition laws in the countries in which you operate. You must operate fairly and do not engage in price fixing, price discrimination, or unfair trade practices that violate applicable antitrust and competition laws.
- You prohibit all types of bribery, corruption and money laundering.
- You forbid gifts to private persons or public officials that aim to influence business decisions or otherwise encourage them to act contrary to their obligations.
- You are required to have an established information security system to protect United-Guardian's information – and the information of its customers and employees – from being disclosed, changed, destroyed or used for any purpose other than the purpose for which it was provided.
- You implement an appropriate Compliance Management System, which facilitates compliance with applicable laws, regulations, and standards.
- You establish training measures to allow your managers and employees to gain an appropriate level of knowledge and understanding of the content of this Supplier Code of Conduct, the applicable laws and regulations and recognized standards.
- You shall sign and comply with the terms and conditions of any and all purchase orders, contracts and General Terms and Conditions of United Guardian which is presented to you from time to time. This Supplier Code of Conduct, once signed and accepted by you, shall constitute a part of an appendix to the existing contract relationship between United Guardian and you.

# **Compliance Statement**

You must comply with this code and all applicable laws when conducting business with United-Guardian Inc.

You are responsible for establishing processes to monitor and record regulatory compliance. Should your adherence to United-Guardian's Supplier Code of Conduct be questioned, you will be expected to provide evidence of conformity to this Suppler Code of Conduct. United-Guardian Inc reserves the right to investigate any occurrence of non-conformity to this Supplier Code of Conduct, and in failure to resolve the problem; United-Guardian Inc has the right to terminate the business relationship and any existing contracts.

#### You must also understand and agree to comply with the following:

- **a.** Anti-corruption laws and regulations of countries in which Supplier is registered to do business and all countries within which Supplier conducts business;
- **b.** Trade restrictions including but not limited to sanctions and embargoes of the United States of America, the European Union and the United Nations that may be applicable to and restrict the export, re-export or importation of United-Guardian's goods and services; and
- **c.** United-Guardian's Global Standards Code of Business Conduct and Ethics, available on the internet at u-g.com (United-Guardian requires that you enforce this code or a similar code with your suppliers throughout your Supply Chain)

please select one of the following statements:
• has received the United Guardian Supplier's Code of Conduct and affirms
that commits to compliance with the Supplier's Code of Conduct and the principles stated within.
affirms that it will follow all applicable laws, treat people with dignity and
respect, avoid conflicts of interest, protect the environment, provide safe and healthy working conditions,
and protect United Guardian's information.
• is in compliance with the United-Guardian Supplier's Code of Conduct by
virtue of the implementation of and adherence to its own Code of Conduct, which includes standards that
are consistent with United-Guardian's Supplier's Code of Conduct and the principles stated within.
(Please attach an electronic copy to this response form.)
<ul> <li> has concerns about its ability to comply with the United Guardian Supplier's</li> </ul>
Code of Conduct. (Please identify which areas you have concerns with and provide detail about those concerns.)
• does not comply with the requirements of the United-Guardian Supplier's
Code of Conduct and has no plans to do so.
name of supplier:
name of supplier representative:
signature:
title:
date:
email address: