

Big Green Smile Supplier Code of Conduct

March 2020

BigGreenSmile is strongly committed to ensuring that both the products and services we provide are done so in a way that respects human rights and the environment.

We work with suppliers that work with these same principles. These standards are derived from the United Nations Guiding Principles on Business and Human Rights and the UN Universal Declaration of Human Rights.

In our application of these standards, we follow these key principles:

1. **Inclusivity:** Our standards apply to all workers regardless of race, colour, national origin, gender, gender identity, sexual orientation, religion, disability, age, political opinion, pregnancy, migrant status, ethnicity, caste, marital or family status, or similar personal characteristics. We recognise these groups may be disproportionately impacted by issues addressed in our Supplier Code and may be more vulnerable to exploitation. We are committed to addressing risks specific to these groups and working with our suppliers to evaluate and address circumstances that may arise but are not specifically covered by our Supplier Code.
2. **Continuous improvement:** BigGreenSmile operates a policy of continuous improvement, and we are committed to working with our suppliers to improve protections for their workers and workplace.
3. **Supply chain accountability:** To ensure our standards are met throughout our supply chain, we expect suppliers to consistently monitor and enforce these standards in their own operations and supply chain, as well as make improvements to meet or exceed our expectations and those of our customers as reflected in our Supplier Code.

Suppliers are required to disclose any subcontractors or agents upon request. While we expect suppliers to meet all applicable aspects of the Supplier Code, the size and structure of the suppliers (e.g., free-lancers, micro businesses, home workers), will be taken into consideration when implementing these requirements.

Employment Rights

1. **Young Labour.** BigGreenSmile does not tolerate the use of child labour. BigGreenSmile defines a child as anyone under the age of 17.
2. **Involuntary Labour, Human Trafficking, and Slavery.** BigGreenSmile suppliers must not use forced labour, prison, indentured, bonded, or otherwise. BigGreenSmile does not tolerate suppliers that traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction, or fraud. All work must be voluntary, and workers must be free to leave work and terminate their employment or other work status with reasonable notice. Workers must not be required to pay recruitment, hiring, agents' or brokers' fees, or other related fees for their employment.

3. **Wages and Benefits.** Suppliers are required to pay their workers in a timely manner and provide compensation (including overtime pay and benefits) that, at a minimum, satisfy applicable laws. Suppliers are required to provide to their workers the basis on which workers are being paid in a timely manner via pay stub or similar documentation. Deductions from wages as a disciplinary measure are not permitted. In addition, we encourage our suppliers to regularly evaluate whether workers earn enough to meet their basic needs and the needs of their family.

4. **Working Hours.** BigGreenSmile expects our suppliers to regularly monitor working hours to ensure the safety, health, and welfare of workers. Suppliers must not require a worker to work more than 48 hours per week, plus a maximum of 12 hours overtime, and each worker must be entitled to at least one day off for every seven-day work period. In all circumstances, working hours must not exceed the maximum amount permitted by law.

5. **Fair Treatment.** All workers must be treated with respect and dignity. Our suppliers must not engage in or permit physical, verbal, or psychological abuse or coercion, including threats of violence, corporal punishment, mental coercion, sexual harassment, or unreasonable restrictions on entering or exiting work and residential facilities, or other forms of intimidation. Workers must be free to voice their concerns to BigGreenSmile or its auditors including through confidential worker interviews and allowed to participate in the audit process without fear of retaliation by supplier management. We encourage suppliers to provide training on non-discrimination and harassment.

6. **Freedom of Association.** BigGreenSmile expects that our suppliers respect the rights of workers to establish and join an organisation of their own selection. Workers must not be penalised or subjected to harassment or intimidation for the non-violent exercise of their right to join or refrain from joining such legal organisations.

Health and Safety

1. **Health and Safety.** BigGreenSmile expects our suppliers to provide workers with a safe and healthy work environment. Suppliers must, at a minimum, comply with applicable laws regarding working conditions and with the standards in the BigGreenSmile Supplier Code.

2. **Occupational Safety.** Suppliers are required to monitor workers' potential for exposure to safety hazards (e.g., chemical, mechanical, electrical and other energy sources, fire, vehicles, and fall hazards) and identify, assess, and control these hazards through proper design, engineering and administrative controls, preventative maintenance and safe work procedures, and ongoing safety training. Where hazards cannot be adequately controlled by these means, suppliers are required to provide workers with appropriate, well-maintained, personal protective equipment, together with training on when and how to use the equipment correctly and educational materials about risks to them associated with these hazards. We encourage Suppliers to monitor for workplace health and safety risks that may impact pregnant women and nursing mothers and take reasonable steps to reduce these risks and inform them of any hazards.

Occupational Injury and Illness: Suppliers are required to put procedures and systems in place to prevent, manage, and track occupational injury and illnesses, such as encouraging worker reporting, classifying and recording injury and illness cases,

providing necessary medical treatment, investigating cases, and implementing corrective actions to eliminate their causes.

Industrial Hygiene: We encourage Suppliers to identify, evaluate, and control worker exposure to chemical, biological, and physical agents. This includes eliminating or controlling potential hazards through proper design, engineering, and administrative controls. Workers must be informed and receive appropriate education in advance if they will be working with (or otherwise exposed to) hazardous or dangerous conditions or materials. In addition, workers must be given appropriate personal protective equipment and educated and trained on the proper use of such equipment.

3. **Physically Demanding Work.** Suppliers must continually identify, evaluate, and control physically demanding tasks to ensure that worker health and safety is not jeopardised.

4. **Emergency Preparedness and Response.** Suppliers are required to identify and plan for emergency situations and implement and train their workers on response systems, including emergency reporting, alarm systems, worker notification and evacuation procedures, worker training and drills, first-aid supplies, fire detection and suppression equipment, and unblocked exit facilities.

5. **Machine Safeguarding.** Suppliers are required to implement a regular machinery maintenance program. Production and other machinery must be routinely evaluated for safety hazards. Where appropriate, suppliers shall provide properly maintained machinery controls (e.g., physical guards, interlocks, and barriers) when machinery presents an injury hazard to workers.

6. **Sanitation and Housing.** Workers must have reasonable access to clean toilet facilities and potable drinking water. If suppliers provide a canteen or other food accommodations, they must include sanitary food preparation, storage, and eating facilities. If suppliers provide residential facilities for their workers, they must provide clean and safe accommodations. Such residential facilities must be equipped with fire alarm, detection, and suppression equipment and workers must be provided with emergency egresses, reasonable and secure personal space, entry and exit privileges, reasonable access to hot water for bathing, adequate heat and ventilation, and reasonable transportation to and from work facilities (if not reasonably accessible by walking).

Environment

1. **Environment.** Suppliers are required to comply with applicable environmental laws; we encourage our suppliers to move beyond compliance obligations to set goals and make progress towards integrating sustainable practices throughout their operations. We encourage our suppliers to implement systems that are designed to minimise the impact on the environment through their supply chain, the production process, and the products themselves. We recognise that small-scale producers and decentralised production processes (e.g., homeworkers) may have alternative, non-traditional mechanisms to implement these requirements. Where implemented, such systems must track and document the environmental impact, including the use of energy, air emissions, waste, water, pollution, hazardous materials, and recycling. We encourage suppliers to use insights from these systems to pursue initiatives that minimise energy, water waste, and greenhouse gas emissions, and seek ways to use renewable sources of energy.

2. **Energy Consumption and Greenhouse Gas Emissions.** We encourage suppliers to track and document energy consumption and all relevant direct and indirect greenhouse gas emissions, identify methods to improve energy efficiency, and minimise their energy consumption and greenhouse gas emissions.

3. **Environmental Permits and Record keeping.** Suppliers are required to obtain and keep current all required environmental permits, approvals, and registrations and follow applicable legal, operational, and reporting requirements.

4. **Effective Management and Disposal of Hazardous Substances.** Suppliers are required to effectively identify and manage the safe handling, movement, storage, and disposal of chemicals and substances that pose a threat to the environment, including providing workers with appropriate training on the safe-handling and disposal of hazardous substances. Suppliers are also required to monitor and control wastewater or solid waste generated from operations before disposing in accordance with applicable laws. In addition, suppliers must characterise, monitor, control, and treat regulated air emissions before discharging in accordance with applicable laws.

Pollution Prevention and Resource Reduction: Whenever possible, suppliers should minimise air emissions, discharge of pollutants, and generation of waste through practices such as adding pollution control equipment, modifying production, maintenance and facility processes, or by other means. We encourage suppliers to minimise the use of natural resources, including water, fossil fuels, minerals, and virgin forest products, through practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

Water Management: We encourage suppliers to implement a water management program that documents, characterises, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. The water management program shall require that all wastewater is to be identified, monitored, controlled, and treated prior to discharge or disposal as required by law.

Solid Waste: Suppliers are required to implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste. We encourage suppliers to set goals to minimise waste to landfill throughout their operations.

Air Emissions: Suppliers are required to identify, routinely monitor, control, and treat air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals, and combustion by-products generated from operations as required by law prior to discharge. At BigGreenSmile's request, suppliers are required to demonstrate that any such required air emissions control systems are performing properly.

Ethical Behaviour

1. **No Bribery.** Our suppliers must not engage in bribery with anyone for any reason, whether dealing with government officials or the private sector. This includes offering, promising, giving, or accepting anything of value to obtain or provide undue or improper advantages to anyone for any reason.
2. **Anti-Corruption.** Suppliers are required to comply with applicable anti-corruption laws, including the United Kingdom Bribery Act, and never bribe a government

official on BigGreenSmile's behalf. Suppliers must not offer, give, or promise anything of value, either directly or indirectly, to government officials to encourage them to act improperly or to reward them for doing so. Prohibited payments can take many forms including, but not limited to cash or cash equivalents, gifts, meals, and entertainment.

3. **Grievance Mechanism and Whistleblower Protections.** BigGreenSmile expects suppliers to protect worker whistleblower confidentiality and prohibit retaliation against workers who report workplace grievances. Suppliers are required to create a mechanism for workers to submit their grievances in a confidential and anonymous manner and maintain an effective process to investigate and address worker concerns. Workers employed by subcontractors must have a mechanism in place to bring their concerns to management teams above the subcontractor.
4. **Transparency.** BigGreenSmile expects suppliers to keep and maintain complete and accurate records about working conditions (e.g., wage and working hour records). Information regarding suppliers' labor, health and safety, environmental practices, and any additional information relevant to the audit process must be disclosed in accordance with applicable regulations and upon BigGreenSmile's request. BigGreenSmile will not tolerate falsification of records or misrepresentation of conditions or practices in the supply chain.

Management Systems

Management Systems: BigGreenSmile expects that suppliers adopt a management system to drive continuous improvement and ensure compliance with applicable laws and this Supplier Code.

Management Accountability and Responsibility. BigGreenSmile expects that our suppliers have designated representatives responsible for implementing management systems and programs that oversee compliance with applicable laws as well as this Supplier Code. Senior management must routinely review and assess the quality and efficiency of the management systems and programs.

Risk Management. BigGreenSmile expects our suppliers to establish a process to identify the environmental, health, safety, and ethical risks associated with their operational and labor practices. In addition, management must develop appropriate processes to control identified risks and ensure regulatory compliance. Suppliers are required to consistently monitor and enforce these standards in their own operations, supply chain, and subcontractors, and should make improvements to meet or exceed our expectations and those of our customers as reflected in our Supplier Code. We encourage suppliers to continuously assess their risks, including those specific to vulnerable groups, including women, migrant workers, and indigenous peoples.

- **Training.** BigGreenSmile expects our suppliers to maintain appropriate training programs for managers and workers to implement the standards in our Supplier Code and to comply with applicable legal requirements.
- **Communication and Worker Feedback.** BigGreenSmile expects that our suppliers clearly and accurately communicate and educate workers about BigGreenSmile policies, practices, and expectations. BigGreenSmile encourages suppliers to implement a process to assess workers' understanding of their rights and responsibilities, and meaningfully engage them through worker-management committees or similar forums. BigGreenSmile may require suppliers to post educational materials in a location accessible to their workers and translated into the appropriate local language(s), train workers on the risks of key issues, and notify

or otherwise train workers on their rights. Suppliers should be conscious of issues with illiteracy, ensuring that trainings take these issues into account.

4. Documentation and Records. Suppliers are required to create, retain, and dispose of business records in full compliance with applicable legal requirements along with appropriate confidentiality to protect privacy. All facilities must maintain a valid business license; suppliers are responsible for reviewing and complying with all legal requirements, and have available required permits, licenses (e.g., health and safety permits, occupancy permits, etc.) necessary to operate.