

## OROTON GENDER EQUALITY IN SUPPLY CHAIN Policy

Oroton is committed to conducting its business with the highest standards of integrity and will only work with suppliers who share and follow our high standards of ethical business behavior and who demonstrate commitment to those standards.

Oroton promotes gender equality and fair working standards throughout our entire business and in the partnerships we form through our supply chain.

The purpose of this policy is to ensure that our expectations for the ongoing development of gender equality initiatives are implemented across all aspects of Oroton's supply chain.

We define Gender Equality as the access to rights or opportunities unaffected by gender.

This Policy applies to all vendors, factories or authorized sub-contractors ("suppliers") in all Regions involved in the manufacturing of Oroton proprietary branded and licensed merchandise sold by Oroton or any authorized seller.

Oroton will not tolerate harassment or discrimination by our vendor and factory partners of any type and expects all those involved in the manufacturing of our products across our entire supply chain to adhere to our expectations of gender equality while treating all workers with dignity and respect.

Oroton expects Vendors and factories to adhere to the following principles:

- Vendors and factories must have a Policy against Discrimination and harassment and ensure it has been communicated to all workers;
- Recruitment and payment for any role within the supply chain will be based on the ability of the worker to perform the role, not their gender or any other personal characteristic such as age, race, color, nationality, gender, religion, marital status, sexual orientation, maternity status, disability or political beliefs;
- Management and Supervisory positions should be given to the best candidate for the role, not based on the characteristics of the applicants (age, race, color, nationality, gender, religion, marital status, sexual orientation, maternity status, disability or political beliefs);
- Discrimination of any type including age, gender, race, sexual orientation, nationality, political opinion, religious, social, ethnic or cultural beliefs is strictly prohibited;
- Female workers must not be questioned about their pregnancy status, and pregnancy tests must not be conducted before hiring or as a pre-condition to employment;
- Vendors must ensure they provide an environment where their employees can work without distress or interference caused by harassment, discrimination or any other inappropriate workplace behavior;
- Vendors and factories must ensure their workplaces are free from all types of harassment including any form including physical, sexual, verbal or visual behavior that creates an offensive, hostile, or intimidating environment;
- Vendors will not use monetary fines against a worker as a disciplinary practice.

We aim to work with supply chain partners who seek to implement initiatives across the entire workforce that aims to improve all workers skills, providing the opportunity for workers to increase their ability to earn a wage higher than minimum wage based on a standard working week and not their gender.

Oroton will monitor compliance to this Policy and our Ethical Sourcing Policy and we or our representatives, may visit a supplier's factories to audit compliance of any part of this Policy to ensure our business expectations are being upheld. These visits may occur at any time and be announced or unannounced.

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Oroton always expects suppliers to co-operate, to be honest and transparent in their dealings with Oroton and commit to making continuous improvements in their operations. Any breaches of this Policy or our Ethical Sourcing Policy will be reported to the supplier for follow up and corrective action. Where there are breaches and/or the supplier does not demonstrate a willingness to comply, Oroton reserves the right to discontinue business with the supplier.

This Oroton Policy and Ethical Sourcing Code does not replace the local laws of the countries in which our suppliers operate. At a minimum, suppliers should always be familiar with and comply with all relevant laws and regulations. In the event of a conflict between these standards and a local law, the stricter requirement must be followed.

The complete Oroton Ethical Sourcing Policy and Supplier Code of Conduct, can be obtained by visiting [www.orotongroup.com](http://www.orotongroup.com)

This Policy should be applied with all Oroton Policies and social compliance expectations and operates within the legal and regulatory requirements of the Country in which Oroton, our Suppliers and Sub-Contractors operate.