

## OROTON UNAUTHORISED SUB-CONTRACTING 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.

We are committed to the traceability of our entire supply chain. This Policy has been developed to ensure our expectations of Sub-Contracting are understood by all parties involved in our end to end supply chain and also detail the actions Oroton will implement as a result of a Supplier or Sub-Contractor using an unauthorised Sub-Contractor for any stage of production within our supply chain.

Oroton define an unauthorised subcontractor as:

- An individual or in many cases a business that agrees to perform part or all of the obligations of another's contract (whether in writing or not), and
- Who has not been approved by Oroton as a subcontractor prior to the agreement being made.

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

We expect Suppliers will not engage a sub-contractor to manufacture any Oroton goods or parts thereof without the express written permission of Oroton.

Any contract engaging a sub-contractor must include a contractual provision requiring compliance with Oroton's Social Compliance expectations and Ethical Sourcing Policy.

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.

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.

Oroton has a zero-tolerance policy to any use of an unauthorised factory or facility across all stages of the production of our products.

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.oroiongroup.com](http://www.oroiongroup.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.