

# CREATECH

Raise your  
potential

## Supplier Code of Conduct

## INTRODUCTION

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Createch continuously strives to deal with suppliers who are leaders in their industries and are willing to demonstrate a strong commitment to sustainable development by adopting labour and human rights, ethics, health & safety and environmental principles. Createch is committed to sourcing responsibly and considers all activities in its supply chain that fuel conflicts and lead to human rights abuses as unacceptable.

Consistent with the application of Createch's sustainability principles, the Supplier Code of Conduct ("Code") outlines the company's expectations in regards to sustainability practices of its suppliers. By adopting this Code, Createch aims at minimizing legal, financial and reputation risks and promoting sustainable development.

In all their activities, suppliers must conduct business in full compliance with the laws, rules and regulations of the countries in which they operate in and with the laws, rules and regulations of any other jurisdiction that is applicable to them. Suppliers are encouraged to go beyond legal compliance, drawing upon internationally recognized standards as indicated in each subsection of this Code, in order to advance social and environmental responsibilities. When the country's laws and international standards address the same issues, we expect that the highest standards to be applied.

## A- MANAGEMENT SYSTEM

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Suppliers shall take all reasonable measures to monitor compliance with this Code and to promptly correct any non-compliance. In this regard, suppliers should establish a management system whose scope is in line with the principles of this Code and in accordance with international standards such as ISO 14001, ISO 27001, ISO 45001, ISO 50001 and SA8000. The management system should be designed to ensure the following elements:

- 1- Compliance with applicable laws, regulations and customer requirements related to the supplier's operations and products
- 2- Conformance with this Code
- 3- Identification and mitigation of operational risks related to this Code and continuous improvement

The management system may contain elements such as: company commitment and policy towards corporate social and environmental responsibilities, identification of the management accountability and responsibility, legal and customer requirements, risk assessment and management, improvement objectives with implementation plans and measures, training programs, audits and assessments; compliance assessment, documentation and records and supplier responsibility.

## B- LABOUR AND HUMAN RIGHTS

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Suppliers are expected to uphold the human rights<sup>1</sup> of workers, and to treat them with dignity and respect in compliance with internationally accepted standards as defined in the International Labour Organization (ILO) conventions and regional or national legislation governing working conditions.

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<sup>1</sup> Universal Declaration of Human Rights *General Assembly resolution 217 A (III) of 10 December 1948*

## 1) Freely Chosen Employment<sup>2</sup>

Forced, bonded (including debt bondage) or indentured labour, involuntary or exploitative prison labour, slavery or trafficking of persons shall not be used. This includes transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities. As part of the hiring process, workers must be provided with a written employment agreement in a language the worker can understand. All work shall be voluntary and workers shall be free to leave work at any time or terminate their employment. Employers and agents shall not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment.

## 2) Young Workers<sup>3</sup>

Child labour shall not be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age of completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers shall protect students' rights by providing appropriate and reasonable accommodations.

## 3) Working hours

Working hours shall not exceed the maximum set by local law. Where there are no applicable laws in the jurisdiction in which they operate, a workweek shall not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.

## 4) Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits to an adequate standard of living. Where no wage law exists, it is expected that workers be paid at least the minimum local industry standard. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labour shall be within the limits of the local law.

## 5) Human Treatment

Suppliers shall provide their employees with a workplace free of harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

## 6) Non-Discrimination<sup>4</sup>

Suppliers shall be committed to provide a workplace free of harassment and unlawful discrimination. Suppliers shall not engage in discrimination based on race, colour, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, medical test results or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Suppliers

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<sup>2</sup> In accordance with ILO conventions 29 and 105 (Forced labour).

<sup>3</sup> In accordance with ILO Convention 138 & Recommendation 146 (Minimum Age).

<sup>4</sup> In accordance with ILO conventions 100 and 111 and recommendations 90 and 111 (Equal remuneration and Discrimination).

are encouraged to provide reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way.

#### **7) Freedom of Association and collective bargaining<sup>5</sup>**

Suppliers shall respect and uphold the rights of workers to freely join labour unions, seek representation and join workers' councils in accordance with local laws, and to bargain collectively. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisals, intimidation or harassment.

## **C- ETHICS**

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### **1) Business Integrity**

The highest standards of integrity are to be upheld in all business interactions. Suppliers shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

Suppliers shall not offer or accept bribes or other unlawful incentives to/from their business partners. Suppliers are expected not to offer to Createch employees gifts or any other kind of personal benefit resulting from the relationships with suppliers.

### **2) No Improper Advantage**

Bribes or other means of obtaining undue or improper advantage shall not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

Createch does not permit facilitation payments to be made, even if they may be legal in a particular jurisdiction. Facilitation payments are typically small, unofficial payments, made to secure or expedite the performance of a routine government action by a government employee or official, such as providing routine police protection or processing permits. Suppliers are expected to refrain from placing Createch team members in a position where they are, or may be perceived to be, in breach of this Code.

### **3) Disclosure of Information**

All business dealings shall be transparently performed and accurately reflected on suppliers' business books and records. Information regarding participant labour, health and safety, environmental practices, business activities, structure, financial situation, privacy breaches and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain is prohibited. Suppliers shall disclose information regarding business activities when requested by Createch.

### **4) Intellectual Property**

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights. Customer and supplier information are to be safeguarded in accordance with Createch's standards and requirements. Suppliers shall make only appropriate use of confidential information and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected.

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<sup>5</sup> In accordance with ILO conventions 87 and 98 (Freedom of Association and Right to Organize and Collective Bargaining).

## 5) Fair Business, Anti-Spam, Advertising and Competition

Suppliers shall comply with all applicable legislation relating to fair business practices, antitrust standards, anti-spam, competition standards and advertising.

## 6) Protection of Identity and Non-Retaliation

Programs that ensure confidentiality, anonymity and protection of supplier and employee whistleblowers are to be maintained. Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

## 7) Privacy & Information Security

Where Supplier handles sensitive information, belonging to Createch Companies, its customers or its employees, Supplier must strictly comply with all applicable privacy laws in the jurisdiction in which they operate, as well as the contractual obligations set forth in the agreement. Createch reserves the right to assess and monitor suppliers' practices regarding information security protection.

Supplier must notify Createch immediately of all actual or suspected privacy breaches, information security incidents or loss of Createch's data and the supplier must assist Createch in managing consequences from such events.

## 8) Community Engagement

Suppliers are encouraged to engage and invest in the communities in which they live, work and serve to promote social and economic development.

## 9) Supplier diversity

Suppliers are encouraged to promote, identify and integrate diversity amongst their suppliers, in addition to workers. Diversity programs to boost the representation of women, Indigenous People, LGBT, and visible minorities veterans or persons with disabilities are expected to be implemented and continually improved.

## D- HEALTH and SAFETY

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### Legislation

Suppliers are expected to comply with the international, regional and national health and safety standards applicable to the Suppliers' business activities such as ISO 45001 Guidelines on Occupational Safety and Health.

Suppliers shall comply with all applicable health and safety legislation and all applicable regulations and perform all services in a diligent manner in respect of health and safety matters.

### 1) Occupational Safety

Suppliers shall ensure that their employees and any person present on or near the workplace are protected against potential occupational health and safety hazards resulting from the Suppliers' business activities. Potential for exposure to safety hazards are to be identified, assessed, and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout-tagout) and ongoing safety training.

Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards.

## **2) Emergency Preparedness**

Potential emergency situations and events including, but not limited to, the structural integrity of the supplier's facilities, fire risk, flooding risk, power supply continuity risk, and other risks which could reasonably be expected, are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property.

## **3) Industrial Hygiene**

Suppliers shall ensure that all products supplied to Createch or used on its premises are in compliance with all applicable workplace hazardous material information standards (i.e.: WHMIS in Canada). Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are to be eliminated or controlled through proper design, engineering and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment. Protective programs shall include educational materials about the risks associated with these hazards. Material Safety Data Sheets must be available in English and French for all controlled products supplied to Createch or used on Createch's premises.

## **4) Physically Demanding Work**

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled by providing appropriate equipment and measures.

## **5) Machine Safeguarding**

Production equipment and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

## **6) Sanitation, Food and Housing**

When applicable, workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the suppliers or a labour agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, heat, ventilation, individually secured accommodations for storing personal and valuable items and reasonable personal space along with reasonable entry and exit privileges.

## **7) Health and Safety Communication**

Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety-related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training should be provided to all workers prior to the beginning of work and regularly thereafter. Supplier shall systematically evaluate its health and safety performance through appropriate audits and report progress.

## E- ENVIRONMENT

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### Legislation

Suppliers shall comply with all applicable statutes, regulations, guidelines, codes of practices, orders and agreements entered into with government authorities relating to the protection and conservation of the environment. Suppliers shall obtain, maintain and report on all environmental permits, approvals, licences and registration as required under environmental legislation.

### Policies and practices

Suppliers shall have knowledge of the environmental impacts associated with their business activities and where appropriate to implement policies, programs and employee training to address, in particular but not limited to, the following matters:

#### 1) Pollution Prevention and Resource Reduction

Emissions and discharges of pollutants and generation of waste of all types are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals and virgin forest products, is to be minimized by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.

#### 2) Hazardous Substances

Chemicals and other materials posing a hazard to humans or the environment are to be identified, labeled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

#### 3) Solid Waste

Suppliers are expected to implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).

#### 4) Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosive, particulates, ozone-depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge.

#### 5) Materials Restrictions

Suppliers shall adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing.

#### 6) Water Management

Suppliers are expected to implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and control channels of contamination. When applicable, all wastewater generated by Createch and managed by suppliers are to be characterized, monitored, controlled, and treated prior to discharge or disposal.

#### 7) Energy Consumption and Greenhouse Gas Emissions

Createch encourages suppliers to take measures to reduce Greenhouse Gases (GHG) emissions generated by their operations, products and services. To rely on a transparent approach, energy consumption and all its relevant scopes 1 and 2 are expected to be tracked and documented at the facility and/or corporate level. Participants are encouraged to improve energy efficiency and to minimize their energy consumption and GHG emissions.

## F- RESPONSIBLE SOURCING OF MINERALS

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Suppliers of tangible products that contain “Conflict Minerals” (as defined below) shall be committed to demonstrate that they have in place the appropriate due diligence controls over Conflict Minerals in their supply chain to ensure that their products are “DRC Conflict Free” (as defined below).

As used in this Section F, the following capitalized terms have the following meanings:

**“Conflict Minerals Rule”** means the rules and regulations of the U.S. Securities and Exchange Commission promulgated under Section 13(p) of the Securities Exchange Act of 1934, as amended.

**“Conflict Minerals”** means (A) columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, which are limited to tantalum, tin and tungsten, or (B) any other mineral or its derivatives determined by the U.S. Secretary of State to be financing conflict in the Covered Countries.

**“Covered Countries”** means the Democratic Republic of the Congo and adjoining countries defined under the Conflict Minerals Rule as the countries that share an internationally recognized border with the Democratic Republic of the Congo (an “Adjoining Country”).

**“DRC Conflict Free”** means that a product does not contain Conflict Minerals necessary to the functionality or production of that product that directly or indirectly finance or benefit armed groups (as defined under the Conflict Minerals Rule), in any of the Covered Countries. Conflict Minerals obtained from recycled or scrap sources are considered to be DRC Conflict Free.

In addition to Conflict Minerals, suppliers of tangible products that contain cobalt should exercise a strict due diligence regarding the way the mineral is sourced. Cobalt contained in products should not come from artisanal mines that do not meet minimum health and safety standards. In addition to that, purchase transactions of these minerals shall not benefit in any way to groups guilty of human rights violation.

## G- SUPPLIER ASSESSMENT AND MONITORING

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Createch reserves the right to assess and monitor on an ongoing basis the supplier’s practices regarding this Code. The supplier may be requested by Createch to complete a self-assessment questionnaire.

Createch or a third party designated by Createch may conduct onsite audits of selected supplier facilities which provide products or services to Createch. Onsite audits may include a review of relevant supplier records, policies and work practices as well as inspection of the facilities for compliance with this Code.

In case of observed non-compliance with this Code, Supplier will take all reasonable measures to meet the standards exposed in this Code in a diligent manner.



## REFERENCES

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The following standards and codes were used in preparing this Code and may be a useful source of additional information. Createch is committed to continuously review this Code to ensure it is updated as needed to align with current industry practices and requirements.

### International Instruments

[Universal Declaration of Human Rights](#)

[ILO International Labor Standards](#)

[ILO Code of Practice in Safety and Health](#)

[Guidelines on occupational safety and health management systems: ILO-OSH 2001](#)

[United Nations Convention Against Corruption](#)

### International Best Practices and Voluntary Standards

[Eco Management & Audit System](#)

[Responsible Business Alliance](#)

[Ethical Trading Initiative](#)

[ISO 14001](#)

[ISO 27001](#)

[ISO 45001](#)

[ISO 50001](#)

[OECD Guidelines for Multinational Enterprises](#)

[OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High Risk Areas](#)

[SA \(SA8000\)](#)

[United Nations Global Compact](#)

[Conflict Minerals Reporting Template \(Responsible Minerals Initiative\)](#)

[Dodd-Frank Wall Street Reform and Consumer Protection Act](#)

[BCE Corporate Responsibility Report](#)

## CONTACTS

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For questions or comments relative to this Code:	<a href="mailto:legal@createch.ca">legal@createch.ca</a>
For questions or comments relative to Createch's procurement practices or in relation to your contract with Createch:	<a href="mailto:legal@createch.ca">legal@createch.ca</a>
To report concerns and potential or actual misconduct that violate this <i>Supplier Code of Conduct</i> , (requests are handled by an independent administrator - ClearView Strategic Partners Inc. on a completely anonymous basis):	<a href="mailto:legal@createch.ca">legal@createch.ca</a>