

# Supplier Code of Conduct

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The Fourth Estate Public Benefit Corporation has been promoting social and environmental responsibility since the company's founding by balancing our strong desire for profitable growth with our commitments to our various stakeholders, including our employees, shareholders, consumers, and the global communities in which we operate.

The Fourth Estate's Supplier Code of Conduct outlines our standards and expectations with respect to key areas of corporate social responsibility. Our goal is to work with Business Partners and vendors to ensure compliance with these requirements.

The Fourth Estate PBC's Supplier Code of Conduct ("Code"), outlined below, defines our minimum standards and expectations of those that do business with the Fourth Estate (our "Business Partners.")

We encourage Business Partners to exceed these basic standards.

## Laws and Regulations

Business Partners must operate in full compliance with all applicable federal, state, and local laws and regulations in which they operate and also in full compliance with this Code.

## Corruption

Bribery, extortion, and kickbacks are prohibited. Business Partners must comply with all applicable anti-bribery and anti-corruption laws.

## Child Labor

Business Partners and their Supply Chain participants must not use forced labor or child labor. Forced labor includes, but is not limited to, work or services performed involuntarily under physical threat or other penalty. This includes respecting the employees' freedom of movement and prohibits restricting worker movement by controlling identification papers, holding employee pay, or taking any other unlawful action to prevent employees from terminating their employment.

Business Partners must comply with all federal, state, and local laws regarding the minimum age of employees, including those pertaining to hours of work, wages, safety, working conditions, and the handling of certain materials. Child labor includes, but is not limited to, any practice that is not compliant with the letter and spirit of the rights set forth in the Convention on the Rights of Children, the ILO Minimum Age Convention, or the Prohibition and Immediate Elimination of the Worst Forms of Child Labor Convention.

## Harassment

Business Partners must treat all workers with respect and dignity. No work shall be subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse. In addition, Business Partners will not use monetary fines as a disciplinary practice. Harassment on the basis of any characteristic described in the nondiscrimination section of this Code is strictly prohibited.

## Wage and Benefits

Business Partners must pay workers at least the minimum compensation required by applicable local law and provide all legally mandated benefits. In addition to payment for regular hours of work, workers must be paid for overtime hours at such premium rate as is legally required or, in those countries where such laws do not exist, at least equal to their regular hourly payment rate. In addition, Business Partners must provide workers compensation insurance to their workers for work-related accidents.

## Hours of Work

Business Partners must ensure that on a regularly scheduled basis, except in extraordinary business circumstances, workers are not required to work more than (a) 60 hours a week, including overtime, or (b) the limits on regular and overtime hours allowed by the local law. In addition, except in extraordinary business circumstances, all workers are entitled to a minimum of one day off in every seven-day period.

## Health and Safety

Business Partners must provide workers a clean, safe and healthy work environment in compliance with all legally mandated standards for workplace health and safety in the countries in which they operate, including the Occupational Safety and Health Act of 1970 and its implementing regulations, and any state Occupational Safety and Health Plans.

## Nondiscrimination

Business Partners must ensure employment - including hiring, payment, benefits, advancement, disciplinary action, termination, and retirement - is not based on characteristics such as color, race, caste, religion, age, nationality, social or ethnic origin, status, sexual orientation, gender, gender identity or expression, HIV, marital status, pregnancy, political affiliation, military service (Veterans), disability or any other status or characteristic protected by local law.

## Women's Rights

Business Partners will ensure women workers receive equal treatment in all aspects of employment. Pregnancy tests will not be a condition of employment. In addition, workers will not be forced to use contraception.

## Freedom of Association and Collective Bargaining

Business Partners must recognize and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association. Suppliers also must respect any legal right of workers to bargain collectively.

## Environment

Business Partners must comply with all local environmental laws applicable to the workplace, the products produced, and the methods of manufacture. Business Partners must encourage the use of processes and materials that support sustainability of the environment.

## Product Quality and Safety

Business Partners must comply with all applicable laws related to the quality and safety of their services products, including any laws applicable to control of hazardous materials. Business Partners must also comply with any quality assurance requirements and product/service specifications communicated by Fourth Estate to supplier.

## Subcontracting

Business Partners must not use subcontractors in connection with Fourth Estate services, products, or product components that contain Fourth Estate trademarks or tradenames without prior approval from the Fourth Estate, and only after the subcontractor has agreed to comply with this Code.

Business Partners must ensure that their suppliers, service providers, and extended networks have ethical and business practices that comply with this Code.

## Communication

Business Partners must communicate, utilizing their existing ethical operating standards/practices or this Code, so that their workers, supervisors, and permitted subcontractors are aware of the expectations /requirements detailed in this Code.

# Monitoring and Compliance

The Fourth Estate Public Benefit Corporation will take affirmative measures to ensure compliance with this Code. Business Partners and business must allow employees from the Fourth Estate or its designated representatives' full access to facilities, documents, worker records, and workers for confidential interviews in compliance with local laws. In certain circumstances, the Fourth Estate may require Business Partners to allow the Fourth Estate customers to accompany the Fourth Estate's representatives during an audit. Those customers may also require full access to facilities, documents, worker records, and workers for confidential interviews in compliance with local laws under the terms of a customer's code of conduct.

Business Partners are expected to take necessary corrective actions to promptly remedy any identified noncompliance. the Fourth Estate reserves the right to terminate its business relationship with any Supplier who is unwilling or unable to comply with this Code when termination is allowed by local laws.

## Application of the Code of Conduct

To the extent the Fourth Estate becomes aware - through either internal or external sources of information - of violations of the terms of the Code anywhere along the supply network, the Fourth Estate will actively investigate and follow-up on any identified noncompliance.

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\* References in this Code to "Fourth Estate" include Fourth Estate Public Benefit Corporation, and its subsidiaries and affiliates, including all members of the Fourth Estate network. This Code applies to suppliers of goods or services to any Fourth Estate entity, and to their employees, agents, and contractors supplying goods to or performing services for the Fourth Estate.

