

CODE OF CONDUCT

The Gem Group, Inc. is committed to working with partners that share our vision of building a clean, safe and compliant supply chain, and our Code of Conduct reflects this commitment. The Code of Conduct lists the minimum requirements that all of our suppliers must meet in order to do business with us. It is designed to meet both local and international standards required by relevant authorities.

The Gem Group requires strict compliance with these standards by all of our Suppliers, authorized subcontractors and any other associated suppliers or production facilities that we do business with. Please contact The Gem Group Compliance Manager at compliance@thegemgroup.com if there are any questions or concerns about The Gem Group Code of Conduct.

CHILD LABOR

- Every employee must meet the country's minimum age requirement or is at least 16 years old whichever is the older.
- The supplier must maintain official documentation that verifies the employee's date of birth and date of employment, and this record is available to The Gem Group, Inc. and our customers. Employees under 18 are not employed in hazardous conditions.

FORCED LABOR

- The use of prison or forced labor for the manufacture of our products is strictly prohibited. We will not tolerate the use of any forms of physical or mental coercion. This extends to all third party suppliers or authorized subcontractors in the supply chain.
- There shall not be any use of forced labor, where in the form of prison labor, indentured labor or bonded labor.
- No employee can be compelled to work through force, the threat of force or intimidation of any form.

HARASSMENT AND ABUSE

- All employees are treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse.

NONDISCRIMINATION

- No employee shall be subject to discrimination in employment, including hiring, compensation, promotion or discipline, on the basis of gender, race, religion, age, disability, sexual orientation, pregnancy, marital status, nationality, political opinion, trade union affiliation, social or ethnic origin or any other status protected by country law.

WAGES, HOURS AND BENEFITS

- All Suppliers and their associated suppliers must comply with all applicable laws regulating wages, working hours, overtime and employee benefits for their particular regions.
- Supplier employees will not work in excess of 60 hours a week or the maximum allowed by local law, whichever is less.

- Overtime hours are consensual and compensated at a premium rate.
- Workers are to be paid at least the minimum wage or at least the local industry standard whichever is greater.
- For each pay period the supplier provides the worker with a clear and understandable wage statement and The Gem Group can inspect this record. All overtime work must be recorded and payment for this work clearly shown on the wage statement.
- There cannot be conditional employment practices, such as training or apprenticeship wages, pre-employment fees, deposits or other practices that effectively lower an employee's pay below the legal minimum wage.
- Workers are entitled to at least one day off in a seven day period.

HEALTH AND SAFETY

- All Suppliers must provide a safe and healthy working environment and take necessary steps to prevent accidents and worker injury arising out of, linked with, or occurring in the course of work or as a result of the operation of Supplier facilities.

LEGAL REQUIREMENTS

- Suppliers and their associated suppliers must comply with all applicable national, local or international laws and regulations relevant to the conduct of their business.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

- Suppliers shall recognize and respect the right of employees to freedom of association and collective bargaining.

INFORMED WORKPLACE

- Suppliers will keep employees informed about workplace standards both verbally and posting notices in a prominent place. Training for employees on the workplace standards is provided on a regular basis.