



CODE OF CONDUCT

The Gem Group, Inc. (d/b/a Gemline) 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 our suppliers must meet in order to do business with us. It is designed to meet both local and international labor standards required by the relevant authorities.

The Gem Group, Inc. is committed to respecting and upholding the human rights of all workers. We believe every worker must be treated with dignity and respect in accordance with internationally recognized human rights standards. Protecting these rights supports safe and ethical working conditions, strengthens worker well-being and morale, and contributes to the consistent quality and integrity of the products and services we provide.

The Gem Group, Inc. expects the same commitment throughout our supply chain. We require our suppliers and business partners to uphold these principles and ensure that all workers are treated fairly and respectfully. This expectation applies to all workers involved in the production of The Gem Group, Inc. products, including temporary, migrant, student, intern, apprentice, contract, and direct employees, as well as any other type of worker. Suppliers and business partners are expected to maintain responsible labor practices and actively support the protection of human rights across their operations.

CHILD LABOR

- Every employee must meet the minimum age requirement in the applicable country, or be at least 16 years old, whichever is older.
- Suppliers must maintain official documentation that verifies the employee's date of birth and date of employment, and this record must be made available to The Gem Group, Inc. upon request.
- Suppliers must not allow employees under age 18 to be employed in hazardous working conditions.

FORCED LABOR

- The use of forced labor in any form for the manufacture of our products, including prison, bonded or indentured labor, is strictly prohibited.
- No employee shall be compelled to work through force, threats, coercion or intimidation of any form.
- This code of conduct applies to all employees, third-party suppliers and authorized subcontractors across the entire supply chain.



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.
- There will be zero tolerance for retaliation of any kind against an employee who raises a complaint of harassment or abuse.

NON-DISCRIMINATION

- No employee shall be subject to discrimination in employment, including hiring, compensation, promotion or discipline, based on 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 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 applicable regions.
- Suppliers employees will not work more than 60 hours per week or the maximum allowed by local law, whichever is less.
- Overtime hours are to be 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, Inc. may review this record upon written request at any time.
- All overtime work must be recorded, and payment for this work clearly shown on the wage statement.
- Suppliers shall not have conditional employment practices, such as training or apprenticeship wages, preemployment 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 because of the operation of Supplier facilities.



LEGAL REQUIREMENTS

- Suppliers and their subcontractors must comply with all applicable local, national, and international laws and regulations governing their business operations.

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 must ensure employees are informed of workplace standards through both verbal communication and clearly posted notices in prominent locations.
- Regular training on workplace standards must also be provided to employees.

ENVIRONMENT

- Suppliers are expected to manage their environmental impact responsibly and, where possible, adopt best practice standards.
- Environmental performance should be regularly monitored and improved.
- Packaging should be reduced, reused, or recycled wherever possible.
- Materials used must be appropriate for their intended purpose and designed to minimize waste.
- At a minimum, all applicable environmental laws and regulations must be followed.

SUPPLIER COMMITMENT

- We require all suppliers to confirm adherence to this Code of Conduct on an annual basis. Failure to comply may result in the review and possible termination of the business relationship.

Signed on behalf of Supplier:

Name: _____

Position: _____

Signature: _____

Date: _____