



Silver Fern Chemical, Inc.
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Silver Fern Chemical, Inc. Supplier Code of Conduct

As a U.S. company buying and selling goods internationally, **Silver Fern Chemical, Inc.**, endorses the UN Guiding Principles on Business and Human Rights. We are committed to human rights, in line with the International Bill of Human Rights consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights; and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. We support the OECD Guidelines for Multinational Enterprises and resulting commitments to compliance with applicable laws, and to fighting corruption in all its forms. In light of these considerations, we expressly embrace this **Code of Conduct**, for our company and our suppliers internationally:

1. BUSINESS IS CONDUCTED LAWFULLY AND WITH INTEGRITY.

- a. **Compliance with Laws.** All laws and regulations are complied with in the countries in which Silver Fern Chemical operates. All other applicable international laws and regulations are complied with including those relating to international trade (such as those relating to sanctions, export controls and reporting obligations), data protection and antitrust/competition laws.
- b. **Bribery.** There is a prohibition on any and all forms of bribery, corruption, extortion or embezzlement and there are adequate procedures in place to prevent bribery in all commercial dealings undertaken by Silver Fern Chemical.
- c. **Conflicts of Interest.** All and any conflict of interest in any business dealings with our Customers, of which Silver Fern Chemical is aware, will be declared to the Customer to allow the Customer the opportunity to take appropriate action. Any ownership or beneficial interest in Silver Fern Chemical's business by a government official, representative of a political party or a worker of a Customer are declared to the Customer prior to any business relationship with the Customer being entered into.
- d. **Gifts and Hospitality.** Any business entertaining or hospitality with the Customer is kept reasonable in nature, entirely for the purpose of maintaining good business relations and not intended to influence in any way the Customer's decisions about how the Customer awards future business. Gift giving should occur sparingly and always be legitimate and aligned with company policies.
- e. **Confidential and Competitor Information.** All competitor information is obtained and used legitimately and in compliance with all applicable laws and regulations. No attempt is made to divulge to the Customer any information about its competitors. Likewise, the Customer's confidential information must

not be shared with any third party unless expressly permitted by the Customer.

- f. **Financial Records, Money Laundering and Insider Trading.** All business and commercial dealings are transparently performed and accurately recorded in Silver Fern Chemical's books and records. There is no actual or attempted participation in money laundering. No confidential information in Silver Fern Chemical's possession regarding our Customers is used to either engage in or support insider trading.
 - g. **Safeguarding Information and Property.** The Customer's confidential information, know-how and intellectual property is respected and safeguarded. All information provided by the Customer that is not in the public domain is deemed confidential and it is only used for its intended and designated purpose. All and any personal information about individuals, such as our Customers' consumers or employees, is handled with full respect for the protection of their privacy and for all relevant privacy laws and regulations.
 - h. **Product Quality and Responsible Innovation.** Products and services are delivered to meet the specifications and quality and safety criteria specified in the relevant contract documents and are safe for their intended use. We expect our Suppliers to conduct research and development responsibly and based on good clinical practice and generally accepted scientific, technological and ethical principles.
 - i. **Reporting Concerns and Non-retaliation.** All workers (whether directly employed or not) are provided with means by which to raise their concerns about any of these requirements and processes are in place to ensure that workers who raise concerns and speak up in good faith are protected from retaliation.
- 2. WORK IS CONDUCTED ON THE BASIS OF FREELY AGREED AND DOCUMENTED TERMS OF EMPLOYMENT.**
- a. All workers, both permanent and casual, are provided with terms of employment that are freely agreed and which respect their legal and contractual rights.
- 3. ALL WORKERS ARE TREATED EQUALLY AND WITH RESPECT AND DIGNITY.**
- a. All workers are treated with respect and dignity. No worker is subject to any physical, sexual, psychological or verbal harassment, abuse or other form of intimidation. There is no discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement. Discrimination based on race, ethnicity, age, role, gender, gender identity, color, religion, country of origin, sexual orientation, marital status, pregnancy, dependents, disability, social class, union membership or political views is prevented. In particular, attention is paid to the rights of workers most vulnerable to discrimination.
- 4. WORK IS CONDUCTED ON A VOLUNTARY BASIS.**
- a. Under no circumstances will Silver Fern Chemical use forced labor or knowingly continue to do business with suppliers who use forced labor, whether in the form of compulsory or trafficked labor, indentured labor, bonded labor or other forms. Mental and physical coercion, slavery and human trafficking are prohibited.

5. **ALL WORKERS ARE OF AN APPROPRIATE AGE.**
 - a. Under no circumstances will Silver Fern Chemical employ, or knowingly continue to do business with any Supplier who employs, individuals under the age of 15 or under the local legal minimum age for work or mandatory schooling, whichever is higher. When young workers are employed they must not do work that is mentally, physically, socially or morally dangerous or harmful or interferes with their schooling by depriving them of the opportunity to attend school.
6. **ALL WORKERS ARE PAID FAIR WAGES.**
 - a. All workers are provided with a total compensation package that includes wages, overtime pay, benefits and paid leave which meets or exceeds the legal minimum standards or appropriate prevailing industry standards, whichever is higher, and compensation terms established by legally binding collective bargaining agreements are implemented and adhered to.
7. **WORKING HOURS FOR ALL WORKERS ARE REASONABLE.**
 - a. Workers are not required to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. All overtime work by workers is on a voluntary basis.
8. **ALL WORKERS ARE FREE TO EXERCISE THEIR RIGHT TO FORM AND/OR JOIN TRADE UNIONS OR TO REFRAIN FROM DOING SO AND TO BARGAIN COLLECTIVELY.**
 - a. The rights of workers to freedom of association and collective bargaining are recognized and respected. Workers are not intimidated or harassed in the exercise of their right to join or refrain from joining any organization.
9. **ALL WORKERS' HEALTH AND SAFETY ARE PROTECTED AT WORK.**
 - a. A healthy and safe workplace is provided to prevent accidents and injury arising out of, linked with, or occurring in the course of work or as a result of the employer's operations.
10. **ALL WORKERS HAVE ACCESS TO FAIR PROCEDURES AND REMEDIES.**
 - a. All workers are provided with transparent, fair and confidential procedures that result in swift, unbiased and fair resolution of difficulties which may arise as part of their working relationship.
11. **LAND RIGHTS OF COMMUNITIES, INCLUDING INDIGENOUS PEOPLES, WILL BE PROTECTED AND PROMOTED.**
 - a. The rights and title to property and land of the individual, indigenous people and local communities are respected. All negotiations with regard to their property or land, including the use of and transfers of it, adhere to the principles of free, prior and informed consent, contract transparency and disclosure.
12. **BUSINESS IS CONDUCTED IN A MANNER WHICH EMBRACES SUSTAINABILITY AND REDUCES ENVIRONMENTAL IMPACT.**
 - a. Operations, sourcing, manufacture, distribution of products and the supply of services are conducted with the aim of protecting and preserving the environment.

This policy is accepted and ascribed to by the officers of Silver Fern Chemical, Inc.:

Sam King, President

Lisa King, Chief Financial Officer