



1112 7TH AVENUE • MONROE, WI 53566-1364

ColonyBrands.com

Colony Brands' Policy on Combatting Forced Labor in the Supply Chain (this "Policy")

At Colony Brands, we're committing to uphold internationally recognized human rights and labor standards in our own operations and across our supply chain and proudly support the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work and the United Nation's Universal Declaration of Human Rights.

Our Policy on Combatting Forced Labor in the Supply Chain complements the requirements set forth in the Supplier Code of Conduct to ensure that Colony Brands' supply chain is free from forced or trafficked labor and is in compliance with local and national laws / regulations, the [ILO's Core Conventions](#), and other relevant international standards. Suppliers must comply with the Policy as a condition of doing business with Colony Brands.

We define forced labor in line with the following ILO Conventions:

Forced Labour Convention No. 29: "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself (or herself) voluntarily". This includes:

- Prison Labor: Work performed by incarcerated individuals as a requirement of their sentence.
- Indentured Labor: Work performed by individuals contractually bound to their employer for a designated time period, usually in return for payment of travel and living expenses.
- Bonded Labor: Work performed by individuals who are subjected to loans that they are required to pay off through low wages by the lender and employer.

Forced Labour Convention No. 105: any form of forced or compulsory labor imposed by state authorities.

Human trafficking is defined by the United Nations as:

"The recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation."

Specifically, Suppliers must acknowledge and agree to the following:

- **Supplier will not use any form of forced labor**, including involuntary, bonded, trafficked, state-imposed, indentured or prison labor, in the production of merchandise or any materials for Colony Brands.
- **Supplier will not engage in any transactions with persons or entities that use any form of forced labor**, including involuntary, bonded, trafficked, state-imposed, indentured or prison labor, in the production of merchandise or any materials for Colony Brands.
- **Supplier agrees to provide detailed information pursuant to any request by Colony Brands at the direction of U.S. Customs and Border Protection**, including but not limited to, material sources, origin and upstream manufacturing information. Information must be provided within 72 hours of request unless another timeline is specified.



1112 7TH AVENUE • MONROE, WI 53566-1364

ColonyBrands.com

Our Suppliers' Code of Conduct has a zero-tolerance policy towards all forms of forced and trafficked labor. We expect our Suppliers to establish and follow reliable procedures consistent with our Policy and relevant applicable local laws to ensure their operations conform to the requirements of this Policy. Suppliers shall maintain sufficient and accurate records substantiating compliance with the Combatting Forced Labor Policy.

Suppliers shall have a system in place to report all forced labor issues, whether potential or actual, within 24 hours of discovery to Colony Brands' QA & sourcing team. Suppliers are expected to immediately take corrective and preventative actions to remediate the issue and ensure that no repetition occurs. Failure to remediate cases of forced labor may result in suspension of orders and permanent cessation of business.

Suppliers must permit periodic monitoring to assess and ensure such adherence as part of the Combatting Forced Labor Policy.

This Policy is mandatory for all supply chain business partners involved in the production of merchandise or any materials for Colony Brands. See also [Colony Brands' Supplier Code of Conduct](#) .

For questions or comments regarding the above, please contact legal@sccompanies.com

To report a suspected violation of this Supplier Code of Conduct contact the Colony Brands Legal Department.

Email legal@sccompanies.com, or write to Colony Brands, Inc., Attn: Legal Department,

1112 7th Avenue, Monroe, Wisconsin 53566 USA

Acknowledgement by Supplier

I, _____ (Full Name), of _____ (Company), hereby acknowledge that I have read, understand and agree to the Colony Brands' Policy on Combatting Forced Labor in the Supply Chain.

Signature: _____

Print or Type Name: _____

Print or Type Title: _____

Date: _____