

SUPPLIER CODE OF CONDUCT

INTRODUCTION

Duravant and its subsidiaries (collectively, “Duravant”) is committed to conducting business in an ethical, legal, environmentally, and socially responsible manner. Similar principled conduct is expected from Suppliers, as defined herein, to continuously improve the sustainability of its operations and products. Duravant encourages its suppliers to participate in this effort by adopting sustainable practices in their operations.

This Duravant Supplier Code of Conduct (the "Code") sets out the requirements expected from the suppliers, service providers, independent contractors, consultants, vendors, agents, distributors, and other third parties ("Suppliers") regarding compliance with all applicable laws and regulations governing areas such as anti-corruption and anti-bribery, social and working conditions, child labor, and the environment. The goal is to work with Suppliers to ensure full compliance with these requirements as they, in turn, apply them to their own employees, agents, subcontractors, and suppliers with whom they work within the delivery of goods and services to Duravant. All Suppliers must obey applicable laws and regulations, and in cases where either the Code or the applicable laws are stricter, the higher of the two shall apply.

By its acceptance of any purchase order from Duravant, Suppliers acknowledge and certify their compliance with the principles and requirements of the Code. In addition, Duravant’s standard terms and conditions for purchase orders and supply contracts (i) require the Supplier and all of its vendors and subcontractors to comply with the Code and (ii) authorize us to terminate the order or contract if the Supplier violates the Code.

COMPLIANCE WITH LAWS AND REGULATIONS

Suppliers shall comply with all applicable national and international laws and regulations, including the International Labor Organization (the "ILO") and the United Nations' Universal Declaration of Human Rights, industry standards, and all other relevant statutory requirements whichever requirements impose the highest standards of conduct.

DOING BUSINESS WITH INTEGRITY

Suppliers shall conduct their business in accordance with the ethical standards set forth in this Code. Suppliers must comply with all applicable laws and regulations concerning corruption, bribery, fraud, and unfair and prohibited business practices.

Responsible Sourcing of Materials: Suppliers shall conduct due diligence on relevant materials in their supply chains to identify applicable risks and take efforts to mitigate them, including determining if materials are sourced from areas and/or industries associated with conflict, child or forced labor, severe health and safety risks, negative environmental impacts, any U.S. sanctions list, or other reasonably objective high-risk activities.

Confidentiality and Intellectual Property: Suppliers shall maintain as confidential all information they have access to, in accordance with applicable laws, and to protect all business confidential information and intellectual property belonging to Duravant and third parties, including but not limited to, trade secrets, trademarks, and copyrights.

SOCIAL AND WORKING CONDITIONS

Suppliers shall recognize and be committed to upholding the human rights of their employees and treat them with dignity and respect as understood by the international community. Our programs and policies support the principles contained within the United Nations Universal Declaration of Human Rights, the UK Modern Slavery Act, and the International Labour Organization's Labour Standards, among others. Our Suppliers shall comport with the following standards:

Freely Chosen Employment: The use of any form of involuntary or forced labor at any stage of the supply chain is prohibited, including the use of prison labor, indentured labor, bonded labor, or labor obtained through human trafficking or slavery. All work must be conducted on a voluntary basis and not under threat of any penalty or sanction. Suppliers are prohibited from restricting movement, retaining identity documents, or withholding wages to prevent workers from leaving at will. Employees shall be free to leave their employment after reasonable notice.

Terms of Employment: Suppliers shall ensure all employees are aware of the terms and conditions of their employment and ensure that all employees are aware of their legal rights and obligations.

Child Labor Prohibition: Suppliers must not, under any circumstances, use child labor as defined by ILO and United Nations Convention and/or national law, whichever is more stringent.

Foreign Contract Workers. Suppliers must ensure that migrant workers are not subject to any form of forced, compulsory, bonded, or indentured labor. Workers employed through an agent or contractor are the responsibility of the Supplier and are thus covered by this Code.

Compensation: Suppliers must comply with all applicable laws, regulations, and industry standards concerning wages, benefits and paid leave. Wages and benefits paid for a standard working week shall meet at least legal or industry minimum standards and Suppliers shall strive to ensure that wages and benefits are sufficient to meet the basic need of workers and their families.

Workers shall be granted and correctly compensated for any types of paid leave to which they are legally entitled. Examples include annual leave, maternity/parental leave, and sick leave. Duravant expects that

Suppliers will work to pay employees regularly and on time, and that wages should reflect the experience, qualifications, and performance of the employee.

Working Hours: Suppliers shall comply with all applicable laws, regulations, and industry standards on working hours, overtime, and time-off.

Non-Discrimination: Suppliers shall strictly adhere to all applicable laws and regulations prohibiting discrimination in hiring and employment on the grounds of race, religion, age, nationality, color, gender, sexual orientation, physical ability, health condition, political opinion, creed or other basis prohibited by law.

Freedom of Association and Collective Bargaining: Suppliers must respect the rights of employees to form or join associations, unions or other work-related associations of their own choosing as well as the right to bargain collectively as permitted by, and within the limits of, local laws without fear of retaliation, discrimination, or termination.

Health and Safety: Suppliers shall provide their employees with a safe and healthy workplace in compliance with all applicable laws, regulations, and industry standards, and implement policies, systems, and trainings to prevent accidents and injuries and protect worker health.

Harassment and Abuse. Suppliers must always treat all their employees with respect and dignity. No employees shall be subjected to any physical, sexual, psychological, verbal, or any other type of harassment, humiliating or corporal punishment, intimidation, coercion, or abuse, nor be subject to any monetary fines as a disciplinary practice. Supplier employees should be able to communicate openly regarding working conditions without fear of retaliation. Our Suppliers are encouraged to adopt a zero-tolerance policy on sexual and gender-based violence in the workplace and to implement strict measures against sexual harassment in its own operations.

Working Conditions: Suppliers shall provide their employees with adequate working facilities including, but not limited to, fire safety, personal protection equipment, access to emergency medical care, and adequate lighting and ventilation.

Slavery and Human Trafficking: Duravant has zero tolerance for slavery or human trafficking in its supply chain, as explained above. This Code requires Suppliers to comply with all applicable laws and regulations in all locations where they conduct business, and forbids the use of forced or involuntary labor of any kind, as well as the use of corporal punishment, threats of violence, or other forms of physical coercion and harassment against employees. At this time, Duravant does not verify, monitor, or audit compliance with the Code and Duravant does not provide employees with training on slavery and human trafficking. However, employees who interact with Suppliers are expected to report any potentially unlawful or unethical conduct that comes to their attention, including the presence of slavery or human trafficking in the supply chain.

Incident Management: Suppliers shall comply with all law related to providing their employees with a system to report health and safety incidents. Suppliers shall investigate, track, and manage those reports in accordance with all applicable legal requirements, as well as take legally necessary corrective action related to the same.

ENVIRONMENT

Suppliers shall work to incorporate environmental responsibility into producing their high quality products. Suppliers shall comply with all applicable environmental laws, regulations, and industry standards, such as requirements regarding industrial wastewater treatment and disposal, environmental permits, and environmental reporting. Further, Suppliers shall comply with any additional environmental requirements specific to the products or service being provided to Duravant as called for in the design and product specifications and contract documents. Suppliers must implement and maintain effective environmental policies to meet these requirements.

Environmental Impact: Suppliers shall aim to reduce or mitigate their environmental impact and to have environmental policies and management systems in place to ensure continuous improvement, such as minimizing and monitoring energy, GHG emissions, waste, water, and raw materials usage. Data tracking this continuous improvement should be maintained by the Supplier and Duravant reserves the right to request it from the Supplier.

Animal Testing: Suppliers agree not to conduct, commission, or pay for animal testing for the purposes of generating data specifically to support the safe use of an ingredient or component by Duravant. Any breach or potential breach of these terms must be communicated to Duravant. In addition, suppliers must ensure that any animal derived products supplied to Duravant are from animals that have been treated ethically in the production process.

ANTI-CORRUPTION AND ANTI-BRIBERY

Suppliers may not, directly, or indirectly through a third-party intermediary, accept or offer anything of value to obtain or retain business or influence governmental decisions or engage in any form of corrupt practices including, but not limited to, extortion, fraud, and bribery, including the bribery of foreign officials. Suppliers are responsible for complying with all applicable anti-bribery laws and must take no action that would subject Duravant to penalties under U.S. or non-U.S. laws, regulations, or administrative requirements including, but not limited to, the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act of 2010, and the anti-bribery/anti-corruption laws of European Union (“EU”) member nations. Suppliers should have appropriate measures for preventing and detecting bribery in place, with the authority to report matters directly to independent monitoring bodies. A clearly articulated and visible corporate policy on promoting ethical business and prohibiting bribery should be in place as well as an explicit commitment from senior management.

ENTERTAINMENT AND GIFTS

Suppliers should be aware that entertainment and gift exchanges may be interpreted as a conflict of interest. Duravant discourages entertainment that could appear excessive or could appear to influence a business decision. Duravant personnel may only accept gifts of nominal value, meaning the gift must have a value equivalent to \$100 or less, including gifts of promotional value, meaning the gift is primarily of an advertising or promotional nature. Although gifts are allowed in this limited form under Duravant policies, we generally discourage the giving and accepting of gifts. Duravant personnel and their immediate families may never accept gifts of cash equivalents, including checks, gift certificates, and gifts cards from Suppliers. For additional details on Duravant's expectations with respect to entertainment and gifts, we encourage Suppliers to review Duravant's Travel and Entertainment Policy.

CUSTOMS

Suppliers must not engage in or have knowledge of any illegal transshipment or willful manipulation of country of origin in connection with any product made on behalf of Duravant. To remain in compliance with U.S. Customs rules and regulations, Suppliers must ensure that all disclosures are honest and accurate.

COMMUNICATIONS AND IMPLEMENTATION

Suppliers must effectively communicate to all their employees the content of this Code and undertake actions necessary and appropriate to ensure their implementation.

SUPPLIER AND SUBCONTRACTOR MANAGEMENT

Suppliers must document that all of their agents, subcontractors, and suppliers comply with the requirements of this Code.

MONITORING/RECORD KEEPING

Supplier shall maintain documentation appropriate to demonstrate adherence to the Code, both for its own operations as well as those of their agents, subcontractors, and suppliers. Suppliers shall provide access to such documentation and other information demonstrating adherence to this Code upon request.

INTERNAL ASSESSMENT AND POTENTIAL IMPACTS ON BUSINESS RELATIONSHIP TO DURAVANT

Duravant reserves the right to conduct (or have its designee conduct) unannounced inspections of Supplier and their facilities to verify compliance with the Code. In addition to any other contractual rights of Duravant, Suppliers' failure to adhere to the Code may result in Duravant ceasing to do business with offending Suppliers.

SUPPLIERS' CERTIFICATION OF COMPLIANCE

By its acceptance of any purchase order from Duravant, the Supplier thereby acknowledges and certifies its compliance with the principles and requirements of the Code.

DEVELOPMENT OF THE CODE

Duravant will review this Code on a regular basis and will introduce revisions where necessary or appropriate. Duravant will notify its Suppliers of any important changes.

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