

Cartamundi's Global Business Principles

Supplier Code of Conduct

Cartamundi, together with its affiliates (“**Cartamundi**”), strives to conduct its business in a sustainable way and in accordance with high ethical and industry standards in the communities where we live and work. Cartamundi seeks that its vendors, suppliers, licensees and manufacturing facilities (“**Supply Chain**”) behave in the same way. As part of our ESG framework, Cartamundi has long recognized concerns about people and the community, ethics and compliance and the environment.

We continuously seek to improve and positively influence the work environment of those involved in the production process of our cards and games. Cartamundi wants its customers and consumers to have confidence that the products and services of Cartamundi and its Supply Chain are produced according to the principles set forth herein.

Implementing the Supplier Code of Conduct allows Cartamundi to ensure that its entire Supply Chain understands and complies with Cartamundi's Global Business Principles defined in this document. Participation in this program and adherence to these principles are mandatory for the entire Supply Chain and a condition to do business with us.

I. People

1. Human rights and international labor standards and conventions. We uphold the Universal Declaration of Human Rights, the Fundamental Principles and Rights at Work of the International Labour Organization, the United Nations Guiding Principles on Business and Human Rights, the United Nations Convention on the Rights of the Child, the Rights of the Child and Principles business, UN and ILO Conventions which include:

a) **Forced labor.** There will not be any form of forced, bonded (including debt bondage), involuntary or exploitative prison, trafficked or slave labor on the Supply Chain of Cartamundi products and services¹. All employment, including overtime, shall be voluntary.

b) **Child labor.** The use of child labor is prohibited in the Supply Chain. No person shall be employed in an operation that produces materials or products for Cartamundi under 16 years of age² or younger than the age for completing compulsory education in the country of manufacture, where this age is higher.

c) **Working hours and compensation.** Our Supply Chain must comply with all applicable national and local wage and hour laws, including minimum wage laws those consistent with prevailing industry wage standards, if higher. Employee benefits shall be provided according to national and local requirements.

Regular working hours shall not exceed 48 hours per week, with one day off in seven days. Overtime work under necessary business circumstances must be conducted to adequately compensate workers for all work performed beyond regular working hours.

d) **Health and safety.** All management within the Supply Chain shall ensure that all employees have a healthy and safe environment, including dormitories where provided, that complies with the following standards³:

- Occupational Health and Safety
- Emergency Preparedness
- Occupational Injury and Illness
- Industrial Hygiene
- Physically Demanding Work
- Machine Safeguarding
- Sanitation, Food, and Housing
- Health and Safety Communication.

e) **Diversity/inclusion.** Our Supply Chain shall treat people equally, regardless of race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, social origin, disability, medical condition, pregnancy or childbirth, religious or philosophical beliefs, political affiliation, union membership, covered veteran status or other protected characteristics, protected genetic information or marital status.

We encourage initiatives that promote a more significant presence of minority groups in companies.

¹ Rehabilitation programs can be evaluated by Cartamundi on a case-by-case basis. Employees may be required to work overtime if agreed in the Collective Bargaining Agreement or in an Employee Handbook.

² Workers under 16 years of age may be considered case-by-case when hired under Convention 138 of the International Labor Organization (ILO).

³ In accordance with ISO 45001, ILO Guidelines on Occupational Safety and Health and RBA.

f) **Harassment/dignity/respect.** Cartamundi treats its employees respectfully and expects all our Supply Chain's employees to be treated with dignity and respect. No person should be subject to harsh or inhumane treatment including violence, (sexual) harassment or abuse, corporal punishment, mental or physical coercion, bullying, public shaming or verbal abuse, cruel or unusual disciplinary practices, nor should there be the treat of any such treatment.

g) **Freedom of association and collective agreement.** Cartamundi recognizes the right of all employees to negotiate collectively and choose [or not] to affiliate with legally sanctioned organizations or associations without unlawful interference. We expect our Supply Chain to do the same.

2. Social dialogue and stakeholder engagement. Cartamundi encourages a transparent, responsible, and ethical relationship with stakeholders and seeks to promote positive results throughout all its phases, behaving respectfully in each location where the company operates. The commitment to the principles of the Global Compact and Sustainable Development Goals must be upheld, making the business more efficient and responsible.

3. Training and development. Cartamundi promotes mentoring and training of its employees to improve employee development initiatives and to attract, develop and retain talent. Cartamundi encourages its Supply Chain to establish and maintain mentoring and training programs.

4. Conflict minerals. Cartamundi is committed to sourcing components and materials from companies that do not use conflict minerals such as cobalt, tantalum, tin, tungsten and gold, which directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or adjoining countries⁴. Our Supply Chain must guarantee that the supplied materials and products meet this commitment.

5. Communities. We encourage our Supply Chain operatives to be volunteers and use their strengths to help the communities where they operate.

II. Ethics and Compliance

1. Bribery and corruption, conflicts of interest. We expect our employees and our Supply Chain to make decisions in the best interest of the company and we do not tolerate the conduct of business in an unethical, unprofessional, illegal, fraudulent, unfair, questionable or inappropriate manner. This includes taking, soliciting or offering bribes or kickbacks, practicing money laundering, or providing gifts, favors or services to obtain a competitive advantage on behalf of Cartamundi. Extortion or blackmail and embezzlement, which are forms of corruption involving misuse of company assets, are also prohibited practices.

Cartamundi expects its people and Supply Chain to comply with anti-bribery laws and regulations and to be transparent about potential conflicts of interest, including political involvement.

2. Fair competition. It is in Cartamundi and its Supply Chain's best interest to promote free and open competition. Understandings or agreements with competitors, suppliers or customers that unduly or unlawfully restrict competition are prohibited. Such unfair competition practices include exchange of competitively sensitive information with competitors or resale price maintenance. Cartamundi expects its Supply Chain to comply with all applicable competition and anti-trust laws.

4. Transparent and accurate record-keeping. To help ensure transparency and protect our reputation, Cartamundi expects its people and its Supply Chain to comply with all their record-keeping obligations in a transparent, accurate and timely fashion.

4. Protection of personal information. Cartamundi is committed to protecting the privacy and security of the personal information our stakeholders share with us from loss, alteration, destruction, unauthorized access or disclosure. The Supply Chain must protect the privacy and confidentiality of the personal data of all its stakeholders (employees, contractors, customers, suppliers) from the same risks by taking adequate security measures both at technical and organizational level to protect personal data.

5. Confidential information and IP protection. Cartamundi expects its people and Supply Chain to protect proprietary and confidential business information against unauthorized disclosure or misuse. Cartamundi's intellectual property and that of our customers or licensors must be used and protected with due care. Sensitive products that include very valuable intellectual property of Cartamundi or its customers or licensors must be handled with the utmost precaution and according to communicated instructions regarding their use. All applicable intellectual property laws must be respected. We expect our Supply Chain to protect our and our customers or licensors' confidential information and intellectual property as their own.

⁴ In accordance with the OECD (2016), OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition, OECD Publishing, Paris.

6. Product quality and product safety. Cartamundi produces quality products and follows strict specifications to ensure the health and safety of our end consumers, complying with the laws applicable to each location where the products are sold. Cartamundi obtains quality raw materials from reliable suppliers.

Our Supply Chain must guarantee the same quality and safety for the materials and products supplied, including the use of materials and chemical products approved by the legislation of the countries where we operate.

7. Compliance with applicable laws. Our Supply Chain must comply with the national laws of the country where they are conducting business, any local laws, regulations or standards appropriate to their business and the industry standards which have been established in their location, provided. However, in the event of any conflict between the provisions of any of the preceding laws, regulations, or standards and the requirements of these Global Business Principles, then the provision containing the higher standards shall prevail.

III. Environment

Cartamundi is committed to meeting or exceeding the requirements of all applicable rules and regulations regarding environmental protection and taking the necessary measures to prevent environmental degradation. We expect our Supply Chain to do the same. We adopt strong ecological programs and practices that include:

1. Climate change

- Promoting operational efficiency and reducing consumption of non-renewable energy.
- Prioritizing the use of renewable energy to increase the share of these sources in the company's overall annual electricity consumption.
- Conducting a recognized (or certified) carbon footprint analysis within one year and reporting progress in reducing GHG emissions.
- Monitoring emissions of other air pollutants, when applicable, keeping them within legal parameters.

2. Water and marine resources

- Using water consciously, prioritizing consumption reduction and applying reuse methods.

3. Biodiversity and ecosystems

- Preventing deforestation and loss of biodiversity. Acquiring materials of forestry origin from controlled and certified sources.

4. Use of resources and circular economy

- Reducing the generation of waste and effluents. Ensuring the control of hazardous materials and disposal of toxic materials in a controlled and safe manner.
- Prioritizing recycling and, whenever possible, circularity.
- Seeking to do business with partners equally dedicated to pursuing continuous efforts to fulfill these commitments.

IV. Speak up!

Cartamundi is committed to maintaining an open culture of compliance, good corporate governance, and ethical behavior with the highest standards of honesty and accountability where workers, including those of our Supply Chain, can speak up and report any concerns in confidence. To that end, Cartamundi maintains reporting channels through which inappropriate behaviors can be reported and which guarantee the whistleblower's right to non-retaliation, confidentiality and anonymity in accordance with applicable legislation: see [Cartamundi's Speak up! webpage](#).

Cartamundi expects its Supply Chain to do the same and to encourage their workers to report potential conflicts of interests and compliance concerns in confidence.

V. Monitoring

Cartamundi will have the right to conduct periodic on-site visits to verify environmental social and ethical conditions, including working and living conditions.

While Cartamundi retains its right to terminate its relationship with a vendor, supplier or licensed facility violating these principles, Cartamundi will endeavor to work with the Supply Chain to resolve any issues discovered during its review or audit promptly. Cartamundi will require the implementation of an acceptable written corrective action plan for any issues or non-

conformances found during an audit. Failure to address corrective action plan items may also result in termination of the business relationship.

Cartamundi has the right to conduct its own audits. Cartamundi may however consider the participation of the Supply Chain in the International Council of Toy Industries (ICTI) CARE program, Responsible Business Alliance (RBA) and Sedex, including regular audits by an approved audit company, as generally sufficient for this monitoring requirement.

VI. Communication of these Global Business Principles

Cartamundi will communicate these Global Business Principles to its Supply Chain in an appropriate oral and written form and will endeavor to provide continuous education to its employees on these principles. Cartamundi expects its Supply Chain to ensure the same communication and to promote awareness within its own organization and supply chain.

VII. Execution

By executing this document, the undersigned represents and warrants:

- that they are duly authorized to represent the company; and
- that the execution of this document by the undersigned constitutes a valid and legally binding commitment of the company they represent to comply with the Global Business Principles outlined herein as of the date of signature.

For and on behalf of <Supplier Company Name>:

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Name:

Function:

Date: