

## Supplier Code of Conduct & Responsible Sourcing Policy

TPS Group Holdings, LLC dba., The Paper Store (TPS) is committed to conducting its operations with a high standard of business ethics, in compliance with applicable laws and with a regard for human rights and fair labor practices, environmental stewardship and animal welfare. While we recognize and respect the cultural differences that exist throughout the world, TPS expects its suppliers and agents to share and uphold these values.

The TPS Supplier Code of Conduct & Responsible Sourcing Policy defines minimum expectations. Since the policy cannot be all-inclusive, suppliers and agents are expected to ensure that no abusive or exploitative conditions and practices or unsafe working conditions exist at the facilities where TPS merchandise is manufactured. TPS will not tolerate any supplier or agent that directly or indirectly, through its subcontractors, violates the laws of the country where the merchandise is manufactured.

TPS requires, as a condition of doing business, that all suppliers and agents comply with the Supplier Code of Conduct & Responsible Sourcing Policy, as well as the Fair Labor Standards Act, the Occupational Safety and Health Act, and other applicable laws for merchandise produced within the United States. The California Transparency in Supply Act of 2010 requires large manufacturers and retailers to disclose their efforts to eliminate the risk of slavery, forced labor and human trafficking from within their supply chains. While we do not operate stores in the State of California, TPS is committed working to eliminate these risks in our supply chain through the following efforts:

1. **Verification and Risk Assessment:** TPS's Supplier Code of Conduct & Responsible Sourcing Policy ("the policy") requires suppliers to comply with applicable laws, including laws regarding forced labor. Each supplier agrees to comply with the code prior to becoming a TPS Supplier. TPS suppliers undergo evaluations to ensure compliance with the code, and the local health, safety and labor laws. Risk assessments of the supply chain are conducted to identify areas of potential risk and remediation plans developed to address any risk identified.
2. **Auditing:** TPS conducts both announced and unannounced social compliance program audits, which include review of standards related to forced labor and human trafficking in the supply chain. These audits are performed by third party auditors, as well as TPS internal personnel. Factory management is expected to address issues identified in the audit. A supplier's failure to comply with any of TPS's terms, conditions, requirements, policy or procedure may result in the cancellation of existing orders and/or termination of the business relationship.
3. **Certification:** TPS Supplier Code of Conduct requires its suppliers to comply with applicable laws, including laws strictly prohibiting forced labor. Each supplier agrees to comply with the policy prior to becoming a TPS supplier. Additionally, each supplier reaffirms its compliance to the policy and TPS requirements regarding forced labor through acceptance of TPS purchase orders and shipment of merchandise to TPS.

4. **Accountability:** TPS associates are required to comply with The Paper Store Employee Handbook, which is regularly updated and located on SharePoint. Associate training and certification of compliance is conducted periodically. Associates with production, sourcing or quality control responsibilities are informed of the policy and the requirements regarding forced labor. Allegation of violations of the TPS Employee Handbook by TPS associates and/or the policy by its suppliers are investigated and appropriate action taken, up to and including termination of associates and termination of agents and/or suppliers.
5. **Training:** TPS believes that the success of its supply chain accountability program requires effective education and training of our employees, suppliers, and agents. Accordingly, TPS conducts periodic training for our employees, suppliers, and agents regarding social compliance issues, including human rights and fair labor practices.

## Supplier Code of Conduct

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### Compliance with Laws

Suppliers must comply with all applicable national and/or local laws and regulations which govern their operations, including, those governing labor, health, safety, the environment, corruption and bribery. Suppliers must also procure their raw materials and/or components for TPS products solely from sources who comply with the below standards:

### Employment

- **No Child Labor:** Suppliers will not use child labor. A "child" refers to a person under the minimum age for employment established by local law, or the age at which compulsory school has ended, whichever is greater, but in no case under the age of 15.
- **Voluntary Labor:** All labor must be voluntary. Forced, bonded, prison, or indentured labor is not allowed. Workers must be allowed to maintain control over their identity documents. Slavery and human trafficking are prohibited throughout the TPS supply chain.
  - **Uzbekistan Cotton:** TPS does not knowingly carry products that use cotton originating from Uzbekistan. TPS does not knowingly source any private label or own-brand products from Uzbekistan and continues to take measures to ensure that cotton in TPS's products is not sourced from Uzbekistan.
  - **XUAR Sourcing:** TPS does not knowingly carry products originating from Xinjiang Uighur Autonomous Region (XUAR). TPS does not knowingly source any private label or own-brand products from XUAR and continues to take measures to ensure that cotton in TPS's products is not sourced from XUAR.
    - Vendors cannot supply goods made in XUAR or made from materials produced in XUAR. Vendors are expected to take reasonable

precautions to ensure that their supply chain does not include any cotton from entities that have been sanctioned by the U.S. government.

- **Health and Safety:** Suppliers must provide a safe and sanitary working environment in order to prevent avoidable work-related injuries. Suppliers must ensure at a minimum reasonable access to potable water and sanitary facilities, fire safety, and adequate lighting and ventilation. This applies to dormitory and/or eating facilities where provided.
- **No Harassment or Coercion:** Each worker will be treated with dignity and respect. Corporal punishment, threats of violence or other forms of physical, sexual, psychological or verbal harassment, intimidation, or abuse will not be used or tolerated. Suppliers must not use monetary fines as discipline.
- **Freedom of Association:** Suppliers must respect the right of workers to choose whether to lawfully and peacefully form or join associations of their choosing, as allowed by local law.
- **Nondiscrimination:** Suppliers will not, in violation of applicable local law, discriminate with regard to hiring and employment practices on the basis of race, religion, age, nationality, social or ethnic origin, gender, sexual orientation, political opinion, disability or union membership.
- **Wages and Benefits:** Suppliers must compensate all workers with wages, overtime premiums, and benefits that meet or exceed applicable local law, local industry standards, or collective agreements, whichever are higher.
- **Hours of Work/Overtime:** Suppliers will maintain reasonable employee work hours in compliance with applicable law, provide workers with rest periods and ensure that working hours are not excessive. Suppliers should be working toward maintaining a 60-hour work week. Employees shall not work more than 72 hours per 6 days or work more than a maximum total of 14 hours in a continuous 24-hour day. Except for extraordinary business circumstances, workers should be permitted to at least 1 day off in every 7-day period, or the rest period required by applicable law if greater than 1 day a week. Workers shall not be asked or required to take work off premises.

## Environment

Applicable laws regarding protection and preservation of the environment in the Supplier's country should be complied with. All manufacturing materials and components must be obtained from permissible sources as allowed by applicable law. The Supplier is responsible for maintaining procedures for notifying local authorities in the event of an environmental accident resulting from their own operations.

TPS encourages suppliers to reduce excessive packaging and to use non-toxic, environmentally friendly materials whenever possible.

TPS requires compliance with the United States Endangered Species Act of 1973.

### **Anti-Corruption**

Suppliers must comply with and adhere to the local laws and regulations concerning bribery, corruption, or unethical practices whether in dealings with public officials or individuals in the private sector. TPS does not allow any exchange of favors, money, or gifts, with our team members with the intent to influence business decisions.

### **Monitoring, Documentation and Compliance**

Suppliers will permit TPS and its designated representatives to engage in the assessment of supplier activities to confirm compliance with this policy, including unannounced onsite inspections of production facilities, reviews of books and records relating to labor matters, and private interviews with workers. Suppliers will maintain on site all documentation that may be needed to demonstrate compliance with this policy.

### **Communication of Standards**

Suppliers will take appropriate steps to ensure that the provisions of this policy are communicated to workers, and any subcontractor, and its workers, including the prominent posting of a copy of this policy, in the local language and in a place readily accessible to all workers, at all times. All standards set forth in this policy are subject to applicable local law. All suppliers must operate in compliance with the laws in which they manufacture. If any standard set forth in this policy is, in the supplier's judgement, deemed to violate an applicable local law it must advise TPS in writing immediately.

## Supplier Code of Conduct & Responsible Sourcing Policy Statement

TPS Group Holdings, LLC (TPS) requests that you acknowledge your receipt and understanding of the Supplier Code of Conduct & Responsible Sourcing Policy, which is effective June 6, 2022, by completing this form.

TPS requires, as a condition of doing business, that all suppliers and agents comply with the TPS Supplier Code of Conduct & Responsible Sourcing Policy, as well as the Fair Labor Standards Act, the Occupational Safety and Health Act, the Foreign Corrupt Practices Act, and other applicable laws for merchandise produced within the United States. The California Transparency in Supply Act of 2010 requires large manufacturers and retailers to disclose their efforts to eliminate the risk of slavery, forced labor and human trafficking from within their supply chains. While we do not operate stores in the State of California, TPS is committed to working to eliminate these risks in our supply chain.

Requirements in this policy apply to the whole supply chain, including sub-suppliers, sub-contractors, and farms.

Company Name: \_\_\_\_\_

Company Address: \_\_\_\_\_  
\_\_\_\_\_

Signature: \_\_\_\_\_

Title: \_\_\_\_\_

Email address: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

If you have questions about the policies contained in this document, please contact Jennifer Dwyer at [jennifer.dwyer@thepaperstore.com](mailto:jennifer.dwyer@thepaperstore.com)