



TLS Supplier Code of Conduct

June 2025



Introduction:

At Thomas, Large & Singer Inc. (TLS), we are committed to conducting business with integrity, responsibility, and ethical excellence. We expect our suppliers and partners to uphold the same high standards. Transparency in our supply chain and proactive risk mitigation are fundamental priorities in how we operate.

We cultivate a corporate culture grounded in integrity and ethical practices by ensuring full compliance with applicable laws, regulations, and internal policies. To reinforce this commitment, TLS has embedded due diligence processes and responsible business practices within our governance framework, procurement procedures, corporate policies, and risk management strategies.

As part of our risk management and procurement approach, we actively identify and assess potential threats, implementing effective controls to prevent or mitigate risks where necessary.

This Supplier Code of Conduct outlines our expectations for suppliers providing goods and services to TLS. All suppliers are required to comply with this Code and ensure their own supply chains align with its principles. TLS reserves the right to review and update this Code annually or at its discretion.

To verify compliance, we may request documentation, conduct audits, or perform site visits as needed. Suppliers must maintain accurate records and respond to information requests that confirm adherence to this Code.

Beyond compliance, TLS aims to foster collaboration with suppliers on sustainability initiatives that strengthen best practices and create positive impact across the supply chain. If a supplier fails to meet the standards of this Code, provides false or misleading information, or does not implement corrective measures within the agreed timeframe, TLS may terminate the business relationship immediately. Severe or repeated violations will result in immediate termination.

To further advance sustainability, environmental responsibility, and human rights best practices, we encourage suppliers to establish or work towards implementing relevant human rights frameworks, such as a *Code of Conduct* or a *Petition on Human Rights*.

For any questions or concerns regarding this Code, please contact your TLS representative or submit a report to whistleblower@tlscanada.com.

SUPPLIER CODE OF CONDUCT PRINCIPLES:

By adopting this Code, TLS and our suppliers pledge to uphold the following principles:

1. Laws and Regulations

Suppliers must operate in full compliance with all applicable laws and regulations, as well as this Code and any policies, guidelines, or requirements established by TLS, whether outlined in contracts or communicated through other means.

2. Employment Standards and Human Rights

Suppliers must uphold respect and dignity in their treatment of all individuals, including their own employees, as well as those employed by contractors, subcontractors, or agents. They must also ensure that all workers within their supply chain receive the same level of ethical treatment.

Suppliers must comply with all applicable labour and human rights laws and regulations, covering aspects such as compensation, legally mandated benefits, working hours, leave entitlements, non-discrimination, harassment prevention, collective bargaining, immigration/migrant worker protections, and freedom of association.

A zero-tolerance policy applies to violations of fundamental human rights, in alignment with the OECD Guidelines and UN Guiding Principles on Business and Human Rights (UNGPs). Suppliers must not be complicit in crimes against humanity, war crimes, genocide, torture, forced disappearances, hostage-taking, extrajudicial executions, or any breaches of international humanitarian law.

Respectful Workplace

Suppliers must promote a workplace that is fair, inclusive, and free from discrimination based on race, ethnicity, color, religion, age, sex, sexual orientation, gender identity, marital status, physical disability, or other protected grounds. Discrimination, harassment, and any form of abuse—including physical, sexual, psychological, verbal, violence, or bullying—must not be tolerated.

Occupational Health & Safety

Suppliers must ensure that workers have access to a safe and healthy work environment that meets all legal and regulatory requirements. This includes providing personal protective equipment when necessary, maintaining sanitary facilities, ensuring access to clean drinking water, conducting preventive maintenance on machinery and equipment, enforcing fire safety measures, maintaining adequate lighting and ventilation, and offering occupational health and safety training.

Forced Labour

Suppliers must guarantee that all employment is voluntary and free from coercion. The use of any form of forced or involuntary labour, including prison labour, indentured labour, bonded labour, military labour, slavery, or human trafficking, is strictly prohibited.

Child Labour and Young Workers

Suppliers must strictly prohibit child labour. If employing young workers, they must ensure compliance with all applicable labour laws and regulations.

3. Ethical Behavior

Suppliers must conduct business with the highest standards of integrity and ethics. They must comply with all anti-bribery, extortion, anti-money laundering, and anti-corruption laws and must not engage in fraud or misrepresentation of facts.

Suppliers must uphold fair business, advertising, and competition standards and must not participate in or contribute to violations of general or special competition laws and regulations. Additionally, suppliers must avoid any actual or perceived conflicts of interest in their dealings with TLS. Any potential or actual conflicts must be disclosed promptly upon discovery.

Suppliers must comply with all competition and antitrust laws. This includes avoiding communication with competitors regarding pricing or production levels, refraining from market or customer allocation agreements, steering clear of coordinated boycotts, and not imposing inappropriate conditions on purchases or sales.

Suppliers must ensure that there is no retaliation against individuals who report illegal or unethical behavior that violates this Code of Conduct.

4. Environment

At TLS, we are dedicated to being a responsible corporate citizen in all the communities where we operate. We continuously evaluate and work to minimize the environmental impact of our business activities. We expect our suppliers to share this commitment and take meaningful steps to manage their environmental impact responsibly, including efforts in reducing greenhouse gas emissions, water conservation, biodiversity protection, marine ecosystem preservation, waste management, and landfill diversion.

To fulfill our environmental responsibilities, TLS and its suppliers must:

- Comply with all applicable environmental laws and regulations.

- Ensure that all hazardous and environmentally sensitive materials are properly identified and handled to guarantee safe movement, storage, and disposal.

Suppliers are encouraged to adopt industry best practices in reducing their ecological footprint, actively seeking opportunities to reduce, reuse, and recycle resources while fostering sustainable operations.

Through resource efficiency, operational improvements, and a strong sustainability culture within our company, suppliers, and the broader community, TLS aims to cultivate both a thriving supplier network and healthy ecosystems.

5. Animal Welfare

At TLS, we are dedicated to ensuring the humane treatment of animals and continuously enhancing animal welfare standards throughout our supply chain. We maintain a zero-tolerance policy for animal abuse or cruelty and require suppliers to uphold responsible animal husbandry practices and procedures at all times.

6. Land and Resources

Suppliers must uphold the rights and resources of Indigenous peoples and local communities affected by their operations. This includes full compliance with all applicable laws and regulations governing land and resource use, as well as obtaining necessary permits for activities such as farming, fishing, manufacturing, groundwater usage, or other industrial purposes.

Suppliers are expected to respect land tenure rights of Indigenous and local communities in all aspects of their operations, including raw material sourcing. They must also adhere to the principle of Free, Prior, and Informed Consent, ensuring that affected communities are meaningfully engaged before any decisions impacting their lands or resources are made.

7. Raw Material Sourcing

To enhance transparency in product sourcing and strengthen communication about responsible sourcing practices, TLS requires suppliers to provide, upon request, details of their raw material sourcing methods and relevant traceability information.

8. Product Quality and Safety

Suppliers must maintain high standards for product quality and safety. They must comply with all applicable laws, regulations, and industry standards related to consumer goods, food safety, and quality assurance.



To minimize risks, suppliers should implement protective measures and adhere to good production practices that ensure safe and high-quality products. All consumer goods and food safety processes should undergo independent verification to confirm compliance.

In the event of any product quality or safety concerns, suppliers must immediately report the issue and take prompt, appropriate action, including product removal or recall, to protect consumers.

9. Private and Confidential Information

Suppliers must strictly adhere to all contractual confidentiality obligations and must not use TLS's personal or confidential information for their own benefit, nor for the advantage of any contractors, subcontractors, agents, or their employees. Such information must not be disclosed without TLS's explicit consent.

Suppliers are responsible for safeguarding all personal and confidential information obtained from TLS and must implement robust cybersecurity measures to ensure its protection. Any data security breaches involving personal or confidential information must be reported immediately to the appropriate TLS representative.