



## Supplier Code of Conduct

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### SCOPE

Applies to suppliers for the Whirley-DrinkWorks! family of brands: Whirley Industries, Inc., DrinkWorks Corporation, Easy Go, and ValidFill.

### INTRODUCTION

Whirley-DrinkWorks! values its reputation for conducting business honestly and with integrity. For more than 60 years, we have prided ourselves on doing business the right way. The company, therefore, strives to select suppliers who demonstrate the principles outlined in this code of conduct, and further, suppliers who replicate these principles down the supply chain.

### HEALTH AND SAFETY

Whirley-DrinkWorks! is committed to keeping safety paramount in everything we do and will do business only with suppliers who demonstrate a commitment to safety. We expect suppliers to:

- Make continuous efforts to achieve a workplace that is free from work-related injury and illness.
- Conduct themselves in a manner consistent with all applicable safety standards, including governmental requirements, operations- and facility-specific safety requirements, and contractual requirements.
- Identify and respond to any public health impacts of their operations and the use of their products and services.
- Treat injured employees with respect and provide medical treatment for workplace injury and illness.
- Maintain a workplace free of the effects of alcohol and drug use.

### LABOR

Whirley-DrinkWorks! uses fair employment practices and strives to provide a safe and productive work environment for its employees. The company expects its suppliers to also maintain fair employment practices—specifically:

- Fair working conditions: Adhere to relevant employment laws, including those related to maximum hours of daily labor, rates of pay, minimum age, privacy, and other fair working conditions.
- Child labor will not be tolerated in our supply chain.
- Freedom of engagement: We do not accept the use of slavery, servitude, forced or compulsory labor, human trafficking, or involuntary prison labor.
- Suppliers will safeguard their employees' rights under state and national labor laws and regulations.
- Suppliers are asked to exercise diversity when selecting employees and subcontractors.
- Supplier's corporate policies will insist upon equal treatment of all employees. Discriminatory treatment, abuse, or harassment, whether consciously or unconsciously, will not be tolerated.

## QUALITY

Supplier will meet generally recognized or contractually agreed upon quality requirements. Safety data sheets will be made available to Whirley-DrinkWorks! for any hazardous materials or substances.

Suppliers will assess the likelihood of any crisis that might impact the supply chain, and will implement emergency response plans and procedures.

Suppliers are expected to implement prudent security measures to protect products and raw materials from contamination or tampering, during production, storage, and transportation.

## ENVIRONMENT

Whirley-DrinkWorks! strives to manage its businesses in a sustainable and responsible way. We seek to do business with suppliers who share our concerns for and commitment to sustainable business practices. At a minimum, suppliers must meet all applicable environmental rules, regulations and laws in the countries where they do business. In addition, Whirley-DrinkWorks! will seek business relationships with suppliers who go beyond legal compliance and consistently look for new and better ways to conserve resources, reduce pollution and waste, and enhance the communities in which they operate.

We ask suppliers to provide recyclable packaging for all shipments to Whirley-DrinkWorks! and we reserve the right to return any non-recyclable packaging.

## LEGAL COMPLIANCE

Whirley-DrinkWorks! is committed to obey the law wherever it conducts business. We expect our suppliers to comply with all applicable laws, including laws relating to employment, human rights, the environment, and health and safety. Whirley-DrinkWorks! reserves the right to decline to deal with suppliers who do not comply with the law.

## ETHICS

### *Intolerance for Bribery and Corruption*

Whirley-DrinkWorks! expects its suppliers to do business in an ethical and transparent manner. Suppliers must not offer bribes, kickbacks or improper payments of any kind to government officials or other third parties for the purpose of obtaining or retaining business or gaining an improper advantage. Suppliers are required to comply with the U.S. Foreign Corrupt Practices Act as well as local anti-bribery laws in each jurisdiction in which they do business.

### *Gifts*

Small gifts of inconsequential value may be exchanged in the supply chain, but must not be intended to sway opinions, buy business, compensate for a quality issue, etc. Gifting practices should be fully transparent. If there is any doubt about what might be considered appropriate, please contact Whirley-DrinkWorks! Senior Management.

### *Building a Culture of Ethics*

Whirley-DrinkWorks! provides training to its TeamMates in applying ethical principles to everyday decision making and manages a confidential system for raising concerns and responding to allegations of violations of its code of ethics. We prefer to do business with suppliers who also have a strong commitment to promoting an ethical culture among their employees.

### *Confidentiality*

Suppliers with access to confidential Whirley-DrinkWorks! information must not disclose such information to other parties without Whirley-DrinkWorks! written consent. Such confidential information may include, but is not limited to, product pricing, costs, customers, employees, operating systems, designs, production technologies, and technical or scientific engineering.

## **CYBER SECURITY**

Whirley-DrinkWorks! expects suppliers to demonstrate the highest level of commitment to cyber security in their own operations, and to work with suppliers and subcontractors who demonstrate that same level of commitment. Suppliers are required to protect and secure Whirley-DrinkWorks! information. Should a data breach occur, suppliers must immediately contact Whirley-DrinkWorks! Suppliers may not insert any malicious code into software or equipment that could circumvent data security systems.