



PASHA SUPPLIER CODE OF CONDUCT

This Pasha Supplier Code of Conduct (the “Supplier Code”) documents the expectations that The Pasha Group and its subsidiaries (collectively “Pasha”) have for their suppliers. The Supplier Code applies to any entity that provides goods or services to Pasha (“Pasha Suppliers”). Pasha is committed to partnerships with suppliers that share our dedication to conducting business in a legal, ethical, and socially responsible manner, with a commitment to innovation, excellence and teamwork.

All Pasha Suppliers must meet the standards set forth in the Supplier Code. Pasha encourages all parties to report any actual or suspected violations of the Supplier Code directly to Pasha. Pasha will promptly investigate any reported or suspected violations of the Supplier Code. Violations of this Supplier Code by a Pasha Supplier may result in termination of the business relationship and/or legal action.

Pasha Suppliers are encouraged to reach out to their Pasha business partners with any questions pertaining to the Supplier Code including any concerns related to the appropriateness of any activity connected to a Pasha Supplier’s performance of its contract with Pasha.

The Supplier Code may be modified from time to time without notice, Pasha Suppliers should review this webpage from time to time to ensure that they will comply with the Supplier Code at all times.

Ethical Business Practice

Pasha encourages its suppliers to read its Code of Conduct and The Pasha Way (which can be found at <https://www.pashagroup.com/about/corporate-responsibility/values-and-ethics>). Pasha strongly recommends that its suppliers to comply with the principles set forth in its Code of Conduct. In summary, Pasha expects its suppliers to conduct their business in a responsible and ethical manner.

Pasha Suppliers need to avoid personal conflicts of interests with the interests of Pasha. Suppliers should not receive improper personal benefits resulting from their relationship with Pasha, or undertake other duties that could conflict with their obligations to Pasha. Pasha Suppliers should respect free and fair competition. Corruption, extortion, embezzlement, bribery and kickbacks in any form are strictly prohibited.

Compliance with Law

Pasha Suppliers must operate their businesses in full compliance with all applicable laws, rules and regulations, including but not limited to laws regarding fair competition, anti-corruption, labor and the environment.

Environmental Sustainability

Pasha is dedicated to environmental improvements that foster growth and a sustainable future and expects Pasha Suppliers to be committed to protecting the environment. Pasha Suppliers' environmental sustainability goals should include the reduction of energy and water consumption, minimization of harmful emissions (including emissions of greenhouse gases), minimization of waste, reuse of resources, recycling, and expansion of the use of renewable energy and environmentally friendly technology. Pasha encourages Pasha Suppliers to implement safe and environmentally friendly operational practices, including safe storage and disposal of waste and chemicals. Pasha Suppliers must comply with all applicable environmental laws, rules, and regulations.

Working Conditions - Health and Safety

Pasha Suppliers' employees should be trained on the appropriate occupational health and safety policies and procedures, including emergency evacuation procedures, prior to employment and on a regular basis. Pasha Suppliers are required to abide by all applicable laws, rules, and regulations relating to health and safety in the workplace. Pasha Suppliers should provide a work environment free from threats and violence.

Working Conditions - Discrimination

Pasha is committed to equal employment opportunities for all persons, without regard to race, color, religion, gender, national origin, sexual orientation, marital status, age or disability. Discrimination by Pasha Suppliers on the basis of sex, sexual orientation, gender, gender-identity, familial status, marital status, ethnicity, race, color, national origin, age, religion, citizenship, veteran status, disability, or any other status protected under applicable law is prohibited. Pasha Suppliers are required to comply with all applicable laws, rules, and regulations concerning discrimination in hiring and employment practices.

Working Conditions - Whistleblowing and Protection from Retaliation

Pasha Suppliers should provide a mechanism that allows their employees to report illegal or unethical behavior by the supplier or its employees anonymously without the threat of retaliation. Pasha Suppliers must not retaliate against employees who report illegal or unethical behavior by the supplier or its employees.

Working Conditions - Wages, Benefits and Working Hours

Pasha Suppliers are required to comply with all applicable laws, rules, and regulations governing the provision of benefits, payment of wages and overtime. Work hours and schedules should not negatively impact employees' health or safety.

Working Conditions - Human Rights and Child Labor

Pasha believes in the humane treatment of all workers. Pasha Suppliers must reject the use of forced and compulsory labor as well as all forms of modern slavery and human trafficking. Pasha Suppliers must comply with applicable labor laws, rules, and regulations, and employ only workers who meet the applicable minimum legal age requirements. Pasha Suppliers must not use child labor.

Working Conditions - Freedom of Association

Pasha Suppliers must respect the right of workers to form and join trade unions and bargain collectively; or, where law prohibits these freedoms, facilitate parallel means of communication, association, and/or bargaining.

Protection of Sensitive Information

Pasha Suppliers must not disclose any proprietary or confidential information received from Pasha to unauthorized third parties. All personally identifiable information received by Pasha Suppliers in connection with their relationship with Pasha (“Pasha Personal Data”) must be collected, stored, processed, and deleted in accordance with applicable laws, rules, and regulations. Pasha Suppliers must implement appropriate technical and organizational safeguards to protect Pasha proprietary and confidential information, and Pasha Personal Data, from unauthorized access.

Use of Company Assets

Pasha Suppliers must not use Pasha equipment, systems or other resources (“Company Assets”) for any reason outside the scope of providing services to Pasha. Pasha Suppliers must take at least commercially reasonable efforts to protect Company Assets from unauthorized use or theft.

Import/Export Controls and Sanctions Lists

Pasha Suppliers must comply with all laws, rules, and regulations applicable to the import and export of goods, services and information, and all applicable sanctions lists.

Compliant Supply Chain

Pasha Suppliers are responsible for their actions and for selecting their suppliers. Pasha Suppliers must ensure that their suppliers comply with requirements that are commensurate with this Supplier Code.