

OROTON BRIBERY & CORRUPTION Policy

Oroton is committed to conducting its business with the highest standards of integrity and will only work with suppliers who share and follow our high standards of ethical business behavior and who demonstrate commitment to those standards.

We are committed to working with Vendors who do business in an honest and transparent way.

The purpose of this Bribery & Corruption Policy is to ensure our expectations required of Vendors, factories and Sub-Contractors in relation to our Ethical Sourcing Policy and Supplier Code of Conduct are understood and define any action which may result from any identified instance of Bribery & Corruption within our business.

We define Bribery and Corruption as:

- Bribery as the act or appearance of offering someone something valuable to persuade them to do something for you with the intention to influence the ability to make a fair business decision; and
- Corruption as "dishonesty and illegal behavior by people in positions of authority or power".

This Policy applies to all vendors, factories or authorised sub-contractors ("suppliers") in all Regions involved in the manufacturing of Oroton proprietary branded and licensed merchandise sold by Oroton or any authorised seller.

Oroton requires anyone having a business relationship with Oroton by supplying products and/or services or acting on behalf of such as (but not limited to) vendors, suppliers, consultants, landlords, agents, service providers and organizations to adhere to this Policy at all times.

Bribery and corruption in any form is strictly prohibited and Oroton will not tolerate any instance of bribery or corruption within our business for any reason. Oroton requires all suppliers to comply fully with all legal requirements of the countries in which they operate.

Vendors must demonstrate a high degree of professionalism and have a close affinity with our business ethics. In particular, honesty, fair dealing and the proper treatment of workers is always required.

Vendors must have a policy on ethical standards/business integrity that prohibits bribery and corruption in any form and the Vendors Policy must be communicated to all workers.

Any team member, Vendor, Factory or Sub-Contractor acting for or on behalf of Oroton found breaching this Bribery and Corruption Policy will be subject to an investigation which could lead to the termination of employment for Oroton team members and the termination of all business dealings with the Vendor including the factory and Sub-Contractor.

All requirements in the Oroton Ethical Sourcing Policy and Supplier Code of Conduct are in addition to compliance with applicable local laws. We expect that all business will be carried out with a high degree of integrity, honesty and fair dealings.

Oroton will monitor compliance to this Policy and our Ethical Sourcing Policy and we or our representatives, may visit a supplier's factories to audit compliance of any part of this Policy to ensure our business expectations are being upheld. These visits may occur at any time and be announced or unannounced.

Oroton always expects suppliers to co-operate, to be honest and transparent in their dealings with Oroton and commit to making continuous improvements in their operations. Any breaches of this Policy or our Ethical Sourcing

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Policy will be reported to the supplier for follow up and corrective action. Where there are breaches and/or the supplier does not demonstrate a willingness to comply, Orotan reserves the right to discontinue business with the supplier.

This Orotan Policy and Ethical Sourcing Code does not replace the local laws of the countries in which our suppliers operate. At a minimum, suppliers should always be familiar with and comply with all relevant laws and regulations. In the event of a conflict between these standards and a local law, the stricter requirement must be followed.

The complete Orotan Ethical Sourcing Policy and Supplier Code of Conduct, can be obtained by visiting www.orotongroup.com

This Policy should be applied with all Orotan Policies and social compliance expectations and operates within the legal and regulatory requirements of the Country in which Orotan, our Suppliers and Sub-Contractors operate.