

## OROTON SANCTIONED COUNTRY SOURCING 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.

Our Sanctioned Country Sourcing Policy has been established to ensure our obligations to the Australian Department of Foreign Affairs (DFAT) economic and trade sanctions and understood and implemented across our entire supply chain.

We define a Sanctioned Country as "an action that is taken or an order that is given to force a country to obey international laws by limiting or stopping trade with that country".

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.

As a part of our operations, Oroton complies with both the United Nations Security Council (UNSC) sanctions and autonomous sanctions in Australia and recognise sanctions can apply to different activities within our business and supply chain including:

- The import or export of certain products;
- The prohibition on the provision of services;
- The transfer or movement of funds to or from sanctioned countries, organizations or individuals;
- Travel to or from sanctioned countries, regions or specific locations.

Oroton is always committed to adhere to all legal requirements and will comply with all DFAT economic and trade sanctions laws in all jurisdictions in which we or our Vendors and factories operate.

Vendors, factories and Sub-Contractors who manufacture products for Oroton will agree to adhere to this expectation at all times.

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 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, Oroton reserves the right to discontinue business with the supplier.

This Oroton 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 Oroton Ethical Sourcing Policy and Supplier Code of Conduct, can be obtained by visiting [www.oroiongroup.com](http://www.oroiongroup.com)

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