



BRIGHTON-BEST INTERNATIONAL

5855 Obispo Ave. Long Beach, California 90805 U.S.A.
Tel. (562) 808-8000 • Fax: (562) 808-8105 • www.brightonbest.com

Supplier Code of Conduct

Brighton-Best International (Canada) Inc. ensure that all workers are respected in their work, provide a safe working environment, fulfill environmental protection responsibilities, and comply with business ethics. At the same time, all suppliers and their tier one suppliers are expected to try their best to meet the following social, environmental and ethical requirements:

Human Rights:

Ensure the human rights of workers and treat them with respect. This commitment applies to all workers, including temporary workers, foreign migrant workers, student workers, contract workers, direct hired workers, and any other type of workers. Therefore, suppliers must properly manage their workers to achieve the following goals:

A. Non-forced labor:

Do not employ or use of coerced or bound labor. All work must be voluntary and all workers have the right to terminate employment at any time. Suppliers shall not retain documents such as ID cards, residence permits or work permits for longer than is reasonably necessary for administrative purposes. Not restrict worker' freedom of movement in the workplace. During the hiring process, a written contract must be provided, written in a language that worker can understand and stating the worker's terms of employment.

B. Young Worker and Prohibition of child labor:

"Child labor" means any person under the age of 16, the age for completing compulsory education, or the minimum age for employment in the country in which they are located (whichever is the strictest of the three above). Assistance and remediation must be provided if child labor is found to be employed.

Workers under the age of 18 shall not perform any work that may endanger their health or safety, including night shifts and overtime. Provide a legitimate and well-managed apprenticeship training programmer. Unless otherwise required by local law, suppliers shall pay work-students, interns and apprentices no less than minimum wage or other incoming workers with the same job content.

C. Diversity and Non-Discrimination:

Shall not on the basis of race, color, age, gender, sexual orientation, gender identity and expression, race or ethnicity, disability, pregnancy, creed, political affiliation, group affiliation, veteran status, protected genetic information, or marital status, etc.



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Discrimination or harassment, abuse, physical punishment or inhumane treatment of workers in recruitment, work, affecting their salary, promotion, reward and training opportunities, etc.

Provide workers a place for religious activities. In addition, workers must not be subjected to discriminatory medical tests (including pregnancy or virginity tests) or physical examinations.

D. Working Hours:

Weekly total working hours shall not exceed 60 hours (including overtime hours) or the less than limit set by local law, except in emergency or special circumstances. And guarantee seventh day of rest.

E. Remuneration and Benefits:

Workers must be provided with wages and benefits in accordance with the law, comply with laws regarding wage deductions, and provide workers with payroll statements that clearly state what is being paid. Deductions from wages as a method of disciplinary action are prohibited.

F. Freedom of Association:

Freedom of association or collective bargaining is provided in accordance with local laws. Allow workers to express their opinions openly to management regarding working conditions and undertake not to retaliate or harass workers for doing so.

Occupational Health and Safety:

Suppliers are required to establish health and safety management system to ensure safety working environment for workers:

A. Compliance with occupational health & safety regulations:

Comply with all applicable requirements regarding health & safety and shall identify, assess and control risks that may endanger the health & safety of workers through appropriate design, control, maintenance, safe work procedures and ongoing health and safety instruction, Includes chemical, biological, physical, and ergonomic sources.

If the above measures do not effectively control for hazards, appropriate personal protective equipment must be provided for workers, educate workers about the information of potential risks and procedures should be in place to prevent, manage, track and report occupational injuries and illnesses.

B. Emergency Preparedness:



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Identify possible emergencies, plan responses, implement emergency response plans and provide employees with the correct instructions in relevant procedures.

C. Occupational Injuries and Occupational Diseases:

Establish appropriate procedures and systems to prevent, manage, track and report occupational injuries and illnesses, encourage workers to report, classify and record injury and illness cases, provide necessary medical assistance, investigate cases and take action to eliminate the cause of the accident and help workers to return their works.

D. Health Safety and Communication:

Provide appropriate occupational health and safety information and training in the language the employee uses or understands to identify all workplace hazards to which the employee is exposed, including but not limited to mechanical, electrical, chemical, fire and physical hazards.

Post health and safety-related information prominently in the workplace or place it in a location identifiable and easily accessible by employees.

Provide regular training to all employees before and after starting work.

E. Industrial Hygiene:

Identify, evaluate and control the effects of exposure to chemical, biological and physical hazards for workers according to the level of management and control; eliminate or control potential hazards through appropriate design, engineering and administrative controls. If these measures are not completely effective in preventing hazards, should provide with appropriate personal protective equipment for workers to use; the protection plan must include instructional material on the risks associated with these hazards.

F. Food, Sanitation and Accommodation:

Workers should be provided with clean restroom facilities, drinking water, and sanitary food preparation, storage and consumption facilities. Where dormitory is provided, the facilities should be clean and safe with appropriate private spaces, emergency exits, ventilation, and hot water for showing.

Environmental Protection:

During manufacturing, suppliers shall create regenerative processes with minimal impact on communities, environment and natural resources, while protecting health & safety. In addition, suppliers must comply with the following:

A. Environmental Policy:



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Committed to caring for the earth and cherishing resources, establishing environmental protection and energy conservation policies, effectively implementing environmentally sustainable development.

B. Environmental Permits and Reports:

Obtain and maintain all necessary environmental discharge permits, approvals and registrations, comply with the operational requirements of these documents.

C. Pollution prevention and resource conservation:

Reduce consumption of resources (including raw materials, energy and water), track, record and to reduce energy consumption and greenhouse gas emissions, and to improve energy efficiency and use cleaner sources of energy.

D. Hazardous and Controlled Substances:

Identify and manage chemicals and other substances that are harmful to the environment, thereby ensuring that these substances are handled, used, stored and disposed properly. Air pollution, wastewater and waste generated from operations shall be identified, monitored, controlled, treated and reduced. Comply with established restrictions on the use of certain substances, including labelling substances that require recycling or disposal.

E. Waste Disposal:

Reduce all types of waste, if waste cannot be avoided, comply with applicable regulations, manage and control all waste in a safe and environmentally responsible way.

F. Air Emissions:

VOCs, corrosives, particulates, ozone-depleting chemicals and combustion by-products produced should be classified, monitored, controlled and treated in accordance with government requirements prior to discharge. The performance of the exhaust emission control system should also be routinely checked.

G. Water management:

Implement a water management plan to record, classify and monitor water use and discharge; find opportunities to conserve water and control pollution. All sewage shall be classified, monitored, controlled and treated as required before discharge or disposal. The performance of wastewater treatment and control systems should be routinely monitored to ensure optimum performance and regulatory compliance.



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Ethics:

Suppliers must maintain the highest standards of integrity in their business operations, including:

A. Integrity:

The highest standards of integrity should be observed in all business interactions, a zero-tolerance policy should be in place to prohibit any form of bribery, corruption, fraud, extortion, embezzlement and monitoring procedures should be implemented to ensure compliance with anti-corruption laws.

B. Intellectual Property Rights:

Respect intellectual property rights and transfer technology and know-how in a way that protects intellectual property rights.

C. Conflict-free minerals:

The minerals used in the manufactured products do not directly or indirectly finance armed criminal groups that seriously violate human rights, the procurement, production and sales processes of these minerals should be strictly reviewed, and the reviewed data should be provided when customers inquire.

D. Privacy and Information Security:

Protect the personal information and privacy of anyone with whom we do business, including suppliers, customers, consumers and workers.

Management System:

To implement a management system for above responsibilities, the purpose of the management system is to ensure that the supplier's operations: (a) comply with applicable regulations; (b) meet the above responsibilities; (c) identify and reduce operational risks associated with the above responsibilities. In addition, the system must be able to facilitate continuous improvement by the supplier:

A. Company commitment and management responsibilities:

Establish a social and environmental responsibility policy, state the supplier's commitment to compliance and continuous improvement, designate senior executives and company representatives responsible for ensuring the implementation of management systems and related programs. Senior management should regularly review the operation of the management system.



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B. Legal and Customer Requirements:

Procedures for identifying, monitoring and complying with all applicable laws, standards and regulations.

C. Risk Assessment:

Labor, health & safety, environment and ethic risks are identified and rated. Establish procedures to implement and control the identified risks to ensure regulatory compliance.

D. Improvement goals:

Set performance goals, targets and implement programs to improve supplier labor, health & safety, environment and ethical performance.

E. Training and Communication:

A training program shall be provided for managements and workers to implement policies, procedures and improvement objectives, to meet regulatory requirements. Policies, plans and performance are clearly communicated to workers by training.

F. Feedback and Participation:

Establish procedures to assess worker awareness of this Code and obtain worker feedback for continuous improvement.

G. Evaluation and Corrective Action:

Conduct self-assessments regularly to ensure compliance with regulatory requirements, this Code and other client requirements. Correct findings from internal and external assessments or inspections in a timely manner.

H. Supplier Responsibilities:

The requirements of this Code are communicated to suppliers and suppliers are required to comply with this Code.