

ETHICAL SOURCING AND SUPPLIER CODE OF CONDUCT

JANUARY 2026

POLICY NUMBER: TMG-SEC-007

APPROVAL AUTHORITY: BOARD OF DIRECTORS



THE MAZI GROUP

1. PURPOSE

This Ethical Sourcing and Supplier Code of Conduct establishes The Mazi Group's expectations for ethical, responsible, and sustainable business practices throughout our supply chain. We are committed to working with suppliers who share our values and meet high standards for human rights, labor practices, environmental stewardship, and business ethics. This code applies to all suppliers supporting our brands: Mazi Beauty, Glam Switch, On The Go Mists, and Upvendo.

2. SCOPE

This code applies to:

- All suppliers, vendors, manufacturers, and service providers to The Mazi Group
- All tiers of the supply chain (direct and indirect suppliers)
- All categories: raw materials, components, finished goods, packaging, logistics, and services
- All geographic regions where suppliers operate
- Subcontractors and agents engaged by suppliers

3. CORE PRINCIPLES

The Mazi Group expects all suppliers to:

- Respect human rights and dignity
- Provide safe and healthy working conditions
- Protect the environment
- Conduct business with integrity
- Comply with all applicable laws and regulations
- Continuously improve their practices

4. LABOR AND HUMAN RIGHTS

4.1 Prohibition of Forced Labor

- No use of forced, bonded, indentured, or involuntary labor
- No human trafficking or slavery
- Workers must be free to leave employment with reasonable notice

- No retention of identity documents or deposits
- No debt bondage or coercive practices

4.2 Prohibition of Child Labor

- No employment of children below the legal minimum working age
- Minimum age of 15 years or the local legal minimum, whichever is higher
- Workers under 18 must not perform hazardous work
- Young workers must have appropriate protections
- Support for legitimate workplace apprenticeship programs

4.3 Working Hours

- Comply with applicable laws regarding working hours
- Regular work week not to exceed 48 hours
- Overtime must be voluntary and compensated per law
- Workers entitled to at least one day off per seven-day period
- Adequate rest breaks during shifts

4.4 Wages and Benefits

- Pay at least the legal minimum wage or prevailing industry wage
- Provide legally mandated benefits
- Pay overtime at premium rates per law
- Provide clear wage statements
- No unauthorized deductions
- Work toward living wages

4.5 Freedom of Association

- Respect workers' right to form and join trade unions
- Respect right to collective bargaining
- No retaliation against workers for union activity
- Where law restricts these rights, allow alternative means of representation

4.6 Non-Discrimination

- No discrimination based on race, color, gender, sexual orientation, gender identity, religion, national origin, age, disability, marital status, pregnancy, or any other protected characteristic
- Employment decisions based on ability to perform the job
- Equal pay for equal work
- Reasonable accommodations for disabilities

4.7 Humane Treatment

- Treat all workers with dignity and respect
- No harassment, abuse, or corporal punishment
- No threats of violence or intimidation
- Effective grievance mechanisms for workers

5. HEALTH AND SAFETY

5.1 Safe Working Environment

- Provide a safe and healthy workplace
- Identify and mitigate workplace hazards
- Provide appropriate personal protective equipment
- Ensure adequate ventilation, lighting, and temperature control
- Maintain clean and sanitary facilities

5.2 Emergency Preparedness

- Develop and maintain emergency response plans
- Provide adequate emergency exits and equipment
- Conduct regular emergency drills
- Train workers on emergency procedures

5.3 Occupational Health

- Identify and control exposure to hazardous substances
- Provide health monitoring where required

- Maintain records of workplace injuries and illnesses
- Investigate incidents and implement corrective actions

5.4 Worker Housing

Where supplier-provided housing is offered:

- Housing must be clean, safe, and adequately maintained
- Adequate space, ventilation, and sanitary facilities
- Reasonable privacy for workers
- Freedom to leave housing during non-work hours

6. ENVIRONMENTAL RESPONSIBILITY

6.1 Environmental Compliance

- Comply with all applicable environmental laws and regulations
- Obtain and maintain required environmental permits
- Report environmental incidents to authorities as required

6.2 Pollution Prevention

- Minimize air emissions, water discharges, and waste generation
- Properly treat and dispose of hazardous materials
- Prevent spills and releases to the environment
- Implement pollution prevention programs

6.3 Resource Conservation

- Use energy, water, and raw materials efficiently
- Implement conservation and recycling programs
- Track and report resource consumption
- Set targets for continuous improvement

6.4 Climate Action

- Measure and report greenhouse gas emissions
- Set emission reduction targets

- Implement energy efficiency measures
- Consider renewable energy sources

6.5 Sustainable Materials

- Source raw materials responsibly
- Avoid materials from threatened ecosystems
- Support sustainable forestry and agriculture
- Trace materials to source where feasible

7. BUSINESS ETHICS

7.1 Anti-Corruption

- Zero tolerance for bribery and corruption
- No facilitation payments
- Comply with anti-corruption laws (FCPA, UK Bribery Act, etc.)
- Maintain accurate books and records
- Report any corruption concerns

7.2 Fair Competition

- Compete fairly and honestly
- No price fixing, bid rigging, or market allocation
- Comply with antitrust and competition laws

7.3 Conflicts of Interest

- Avoid conflicts of interest with The Mazi Group
- Disclose any potential conflicts
- Do not offer improper gifts or entertainment

7.4 Intellectual Property

- Respect intellectual property rights
- Protect The Mazi Group's confidential information
- No counterfeiting or unauthorized use of trademarks

7.5 Data Privacy

- Protect personal data in accordance with applicable laws
- Implement appropriate security measures
- Only use data for authorized purposes
- Report data breaches promptly

8. ANIMAL WELFARE

- No animal testing for cosmetic products or ingredients (Mazi Beauty, On The Go)
- Source animal-derived ingredients only from humane sources
- Support alternatives to animal testing
- Comply with animal welfare regulations
- Work toward cruelty-free certifications where applicable

9. CONFLICT MINERALS

- Exercise due diligence on the source of tin, tantalum, tungsten, and gold (3TG)
- Avoid minerals that finance conflict or human rights abuses
- Support responsible mineral sourcing initiatives
- Provide conflict minerals reporting as requested
- Comply with Dodd-Frank Act and EU Conflict Minerals Regulation

10. MANAGEMENT SYSTEMS

10.1 Commitment and Accountability

- Demonstrate management commitment to this code
- Assign responsibility for code compliance
- Allocate adequate resources
- Communicate expectations throughout the organization

10.2 Risk Assessment

- Identify and assess risks related to this code
- Prioritize high-risk areas for action

- Implement controls to mitigate risks

10.3 Training

- Train workers on code requirements
- Ensure understanding of rights and responsibilities
- Provide training in appropriate languages

10.4 Grievance Mechanisms

- Establish effective grievance mechanisms for workers
- Allow anonymous reporting
- Investigate and address grievances promptly
- No retaliation against workers who raise concerns

10.5 Continuous Improvement

- Set targets for improvement
- Monitor performance against targets
- Implement corrective actions when needed
- Share best practices

11. COMPLIANCE AND MONITORING

11.1 Supplier Acknowledgment

- Suppliers must acknowledge receipt and understanding of this code
- Commitment to compliance required as condition of business
- Code requirements incorporated into supplier agreements

11.2 Audits and Assessments

- The Mazi Group reserves the right to audit supplier compliance
- Audits may be conducted by The Mazi Group or third parties
- Audits may be announced or unannounced
- Suppliers must provide access to facilities, records, and workers

11.3 Non-Compliance

- Non-compliance must be reported to The Mazi Group
- Suppliers must develop corrective action plans
- Timely implementation of corrective actions required
- Serious or repeated violations may result in termination

11.4 Zero-Tolerance Violations

The following violations may result in immediate termination:

- Forced labor or human trafficking
- Child labor
- Bribery or corruption involving The Mazi Group
- Serious environmental violations
- Falsification of audit records

12. REPORTING CONCERNS

Suppliers, their workers, and other stakeholders may report concerns about code violations through:

- The Mazi Group procurement contact
- Ethics hotline (anonymous reporting available)
- Email: compliance@mazigroup.us

The Mazi Group prohibits retaliation against anyone who reports concerns in good faith.

13. RELATED POLICIES

This policy should be read in conjunction with:

- TMG-SEC-002: Product Safety and Quality Control Policy
- TMG-SEC-004: Anti-Corruption and Anti-Bribery Policy
- TMG-SEC-006: Sustainability and Environmental Policy
- TMG-SEC-014: Vendor and Supplier Management Policy
- TMG-SEC-021: Code of Conduct and Business Ethics

14. POLICY REVIEW

This code shall be:

- Reviewed annually by Procurement, Legal, and Sustainability
- Updated to reflect regulatory changes and best practices
- Communicated to all suppliers
- Approved by executive leadership after material changes

15. DEFINITIONS

- **Supplier:** Any entity providing goods or services to The Mazi Group.
- **Forced Labor:** Work performed involuntarily under threat of penalty.
- **Child Labor:** Employment of children below the legal minimum working age.
- **Living Wage:** Compensation sufficient to meet basic needs of workers and their families.
- **Conflict Minerals:** Minerals (3TG) sourced from conflict-affected regions.

For questions about this code, contact:

Operations Department
operations@mazigroup.us