

## **Introduction**

Liberty Tire Recycling (“Liberty”) expects all of its employees to comply with the law and act ethically in all matters. We have the same expectations of our suppliers. Our Code of Business Conduct sets the basic standards for employee conduct. This Supplier Code of Conduct establishes related requirements for our suppliers. Working together, we can achieve great success by doing the right thing.

This Code of Conduct is also applicable to all agents, contractors, consultants, and anyone we authorize to act on Liberty Tire's behalf and as such, those third parties are expected to read, understand, and abide by this Code of Conduct in the performance of their duties on behalf of the Company.

Liberty Tire Recycling is committed to these requirements, and we require our suppliers to have either a comparable policy or adopt our Supplier Code of Conduct and apply it to your own business.

This Code reflects our values and sets forth what it expected of its Suppliers with respect to the following topics:

1. Ethics & Integrity
2. Data Privacy & Security
3. Wellbeing, Health & Safety
4. Human Rights, Labor & Employment
5. Environmental Stewardship

## **Ethics & Integrity**

### *Legal Compliance*

Suppliers to Liberty are expected to operate in compliance with all applicable laws and regulations of the countries, states, and localities in which they operate. This includes laws and regulations related to ethical business practices, quality, labor and employment practices, as well as health, safety, transportation and environmental protection. Suppliers are also expected to conform their practices to generally accepted industry standards, obtain, and maintain all applicable insurance coverage, permits, licenses, and registrations, and operate in accordance with permit limitations and requirements at all times.

### *Bribery & Anti-Corruption*

Suppliers must comply with the U.S. Foreign Corrupt Practices Act, as well as all local laws dealing with bribery of government officials. In connection with any transaction as a Supplier to Liberty, or that otherwise involves Liberty, the Supplier must not transfer anything of value, directly or indirectly, to any government official, employee of a government-controlled company, or political party, in order to obtain any improper benefit or advantage.

### *Identification of Concerns*

All Supplier's workers should be encouraged to report concerns or illegal activities in the workplace, without threat or reprisal, intimidation, or harassment. Suppliers shall investigate and take corrective action to the extent needed.

## **Data Privacy & Security**

Liberty requires its Suppliers to protect the privacy of individuals and the security of confidential assets and information. Suppliers who have been given access to confidential information as part of the business relationship should not share this information with anyone unless authorized to do so by Liberty. If a Supplier believes it has been given access to the Company's confidential information in error, the Supplier should immediately notify its contact at the Company and refrain from further distribution of the information.

## **Wellbeing, Health & Safety**

Liberty strives to provide a safe and healthy workplace for employees, customers, and visitors to its premises. As such, we also expect Suppliers to implement sound health and safety practices across their business operations. Suppliers must comply with all applicable health and safety laws and regulations.

We expect Suppliers to adopt practices to minimize health and safety risks, support accident prevention, and ensure a safe workplace for all workers. As such, workers must be trained on the appropriate occupational health and safety policies and procedures, including emergency evacuation procedures, prior to employment and then on a regular basis in the primary language(s) of its workers. Workers should be provided appropriate protective equipment and instructed on appropriate use.

Workers have the right to refuse and report unsafe or unhealthy working conditions regardless of role, title, or responsibility.

## **Human Rights, Labor & Employment**

Suppliers to Liberty are expected to treat people with dignity and respect. We strive to adhere to the principles set forth in these standards and expect our Suppliers to do the same.

### *Modern Slavery / Human Trafficking*

We do not tolerate slavery, forced labor, or human trafficking in any form. Suppliers must fully comply with the applicable legal requirements of slavery, forced labor and human trafficking laws, and enact practices to ensure compliance with such laws.

### *Child Labor*

We do not tolerate child labor in any form. Suppliers must act in compliance with all laws regulating minimum working age for each position, including any laws pertaining to the employment, apprenticeships, and internships of youths and students.

### *Human Rights*

We do not tolerate human rights violations in any form and expects Suppliers to enact practices to maintain a respectful and safe workplace. Suppliers should not tolerate physical violence, threats, corporal punishment, mental coercion, verbal abuse, disrespectful behavior, bullying or harassment of any kind.

### *Employment Law*

We are committed to complying fully with all applicable laws and regulations dealing with wage-and-hour issues, meal and rest breaks, overtime pay, minimum-wage requirements, and other subjects related to wage and hour practices. As such, Suppliers must comply with all applicable local wage and labor laws. Suppliers are required to provide employees with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work. All use of temporary, dispatch and outsourced labor shall be in accordance with local law.

### *Non-Discrimination and Equal Opportunity*

Liberty believes diversity should be celebrated and discrimination of any form should not be tolerated. Suppliers must comply with all applicable laws relating to discrimination in hiring, employment practices, and harassment and retaliation.

Suppliers must operate workplaces free of discrimination, harassment, victimization, and any other abuse on any grounds including but not limited to age, disability, ethnic or social origin, gender, gender identity, nationality, race, sexual orientation, marital status, parental status, pregnancy, political convictions, religious beliefs, union affiliation, or veteran status.

### *Compliance and Documentation*

Suppliers shall implement and maintain a reliable system to verify the eligibility of all workers including age and legal status of foreign workers and implement and maintain a reliable recordkeeping system regarding the eligibility of all workers.

## **Environmental Stewardship**

### *Manage and Reduce Environmental Impacts*

Liberty is committed to conducting business in an environmentally responsible manner. As such, our Suppliers shall operate in the same manner and minimize adverse impacts on the environment. Suppliers are encouraged to conserve natural resources, to avoid the use of hazardous materials where possible, minimize and optimize packaging materials to reduce overall material consumption, and to engage in activities that reuse and recycle.

### *Environmental Compliance and Authorizations*

Supplier shall comply with all applicable laws and regulations regarding environmental requirements or discharge limits. Suppliers shall have obtained all required environmental permits, licenses or authorizations and follow all their operational and reporting requirements.

**NOTE:** *This Code contains general requirements applicable to all suppliers to Liberty. Particular supplier contracts may contain more specific provisions addressing some of these same issues. Nothing in this Code is meant to supersede any more specific provision in a particular contract, and to the extent there is any inconsistency between this Code and any other provision of a particular contract, the contract provision will control.*