





**DTC World Corporation Pte Ltd**

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 <b>DTC WORLD CORPORATION PTE LTD</b> <small>Premiums &amp; POS Merchandise</small>	<b>Number</b>	<b>P05</b>
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Approved by Yee Chin		General Manager		11 Mar 2022



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## **DTC Supplier Code of Conduct**

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### **GENERAL STANDARD**

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#### **INTRODUCTION AND PURPOSE**

DTC World Corporation Pte Ltd sources gifts and promotional items on a worldwide basis, especially in China. We deeply recognize that our supply chain activities have a broad impact, and our responsibilities extend beyond our operations and those of our suppliers. We are also aware of local and national standards differences regarding many aspects of a supplier's business. There are minimum standards that all must achieve and are set out in this policy.

DTC is committed to ethical business practices, and we hold our suppliers to the same high standards. Our policy is to comply with the relevant laws and regulations of the countries in which we operate and conduct our business activities in a responsible and ethical manner.

Our Code of Conduct declares that DTC expects its suppliers to uphold the policies of DTC concerning compliance with all applicable laws, respect for human rights, environmental conservation, and the safety of products and services. DTC expects all suppliers to conduct their business socially responsibly and strive to meet or even exceed the above expectations

## **DTC SUPPLIER CODE OF CONDUCT**

DTC Supplier Code of Conduct establishes standards to ensure that working conditions in the supply chain are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically.

The Code is made up of five sections. Sections A, B and C outline standards for Labour, Health and Safety, and the Environment, respectively. Section D adds standards relating to business ethics and Section E outlines the elements of an acceptable system to manage conformity to this Code.

### **A) LABOUR**

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Suppliers are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all works including temporary, migrant, student, contract, direct employees, and any other type of worker.

The labour standards are:

#### **1. Freely Chosen Employment**

Forced, bonded (including debt bondage) or indentured labour or involuntary prison labour: slavery or trafficking of persons shall not be used. This includes transporting, harbouring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud for the purposes of exploitation. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment. Workers must not be required to surrender any government-issued identification or passports or work permits as a condition of employment. Excessive fees are unacceptable, and all fees charged to workers must be disclosed.

#### **2. Child Labour Avoidance**

Child labour is not to be used in any stage of manufacturing. The term “child” refers to any person employed under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported. Workers under the age of 18 shall not perform work that is likely to jeopardize the health or safety of young workers.

#### **3. Working Hours**

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Workweeks are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off per seven-day week.

#### **4. Wages and Benefit**

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deduction from wages as a disciplinary measure shall not be permitted. The basis on which worker are being paid is to be provided in a timely manner via pay stub or similar documentation.

#### **5. Humane Treatment**

There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers: nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

#### **6. Non-Discrimination**

Supplier should be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, colour, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards, and access to training. In addition, potential workers should not be subjected to medical tests that could be used in as discriminatory way.

#### **7. Freedom of Association**

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. The rights of workers to associate freely, join or not join labour unions, seek representation and join workers' councils as well as right of collective bargaining in accordance with local laws shall be respected. Workers shall be able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.

## **B. HEALTH and SAFETY**

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Suppliers recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Suppliers also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

The health and safety standards are:

### **1. Occupational Safety**

Provide safe and healthy working conditions at all of their operations. Worker exposure to potential safety hazards (eg. electrical and other energy sources, fire, vehicles, and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tag out and ongoing safety training.

Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained personal protective equipment. Workers shall not be disciplined for raising safety concerns.

**2. Emergency Preparedness**

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including: emergency report, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

**3. Occupational Injury and Illness**

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to: a) encourage worker reporting; b) classify and record injury and illness cases; c) provide necessary medical treatment; d) investigate cases and implement corrective actions to eliminate their caused; and d) facilitate return of workers to work.

**4. Industrial Hygiene**

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. Engineering or administrative controls must be used to control overexposures. When hazards cannot be adequately controlled by such means, worker health is to be protected by appropriate personal protective equipment programs.

**5. Physically Demanding Work**

Workers exposure to the hazard of physically demanding task, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly task is to be identified, evaluated and controlled

**6. Machine Safeguarding**

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

**7. Sanitation, Food, and Housing**

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage facilities and eating facilities. Workers dormitories provided by the Suppliers or a labour agent are to be maintained clean and safe, and provide with appropriate emergency exit, hot water for bathing and showering, and adequate heat and ventilation and reasonable personal space along with reasonable entry and exit privileges.

**C. ENVIROMENTAL**

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Suppliers must recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public.

DTC's suppliers and business partners must comply fully with all relevant and applicable laws, regulations, permits, and authorizations governing environmental issues. They must conduct their business in a way that is consistent with DTC's environmental policy.

The environmental standards are:

**1. Environmental Permits and Reporting**

All required environmental permit (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

**2. Pollution prevention and Resource Reduction**

Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

**Best Practices**

- *Factories should develop and implement energy management and conservation procedures for the factory. The Program should address the monitoring and review of energy usage, setting goals, and plans for improving energy efficiency, and should include provisions for comparing actual performance against the goals. The Program should include all processes, lighting, compressed air systems, heating, ventilation, and air conditioning systems, as well as fuel usage in combustion equipment.*
- *Factories should develop and implement in a program designed to maximise the water use efficiency at the factory*
- *Factories should identify opportunities to reduce pollutant loading and toxic chemical loading in discharges by recycling and reuse, product selection, and process modification.*

**3. Hazardous Materials**

Chemical and other materials posing a hazard if released to the environment are to be identified and manage to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

**Best Practices**

- *Factories must have in place procedures to safely receive and handle hazardous materials that are delivered to the factory*
- *Factories must have in place appropriate and adequate spill response equipment and procedures, in order that any hazardous material spills or releases can be safely and adequately responded to in a timely manner*

#### **4. Industrial Wastewater and Solid Waste**

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated as required prior to discharge or disposal.

##### **Best Practices**

- *Factories should develop a water balance across the factory in order to ensure that all wastewater and sewage is being captured and treated to the Recommended Effluent Standards*
- *Factories should develop and implement waste minimization and source reduction procedures in order to minimize the amount of solid and hazardous waste generated by the factory*

#### **5. Air Emissions**

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemical and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge.

##### **Best Practices**

- *Open burning of solid wastes should be avoided*
- *Factories should identify opportunities to reduce pollutants toxic chemicals in air discharges product selection, product substitution, and process modification.*

#### **6. Product Content Restrictions**

Suppliers are to adhere to all applicable laws and regulations and customer requirements regarding prohibition or restriction of specific substances including labelling for recycling and disposal.

#### **7. Protect water resources**

Protect water resources by minimizing use of water in operations, avoiding contamination from their operations, and reducing the impact on the water resources of the surrounding communities

### **D. ETHICS**

To meet social responsibilities and consider operating with integrity as the foundation of business relationships. In order to achieve success in the market, suppliers are expected to uphold the highest ethical standards that include:

#### **1. Business Integrity**

The highest standards of integrity are to be upheld in all business dealings. Suppliers shall have a zero-tolerance policy towards all forms of bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes). All business dealings should be performed in a transparent manner and shall be transacted to reflect compliance with anti-corruption laws.

#### **2. No Improper Advantage**

Bribes of other means of obtaining undue or improper advantage are not to be offered or accepted.

**3. Disclosure of Information**

According to applicable regulations and prevailing industry practices, information is disclosed regarding business activities, structure, financial situation, and performance. Falsification or records or misrepresentations of conditions or practices in the supply chain are unacceptable. All suppliers who have access to confidential data must sign the Data Protection Confidentiality Agreement.

**4. Intellectual Property**

Intellectual property rights are to be respected; transfers of technology and know-how is to be done in a manner that protects intellectual property rights.

**5. Fair Business, Advertising and Competition**

Standards of fair business, advertising and competition are to be upheld. Means to safeguard customer information should be available.

**6. Protection of Identify**

Programs that ensure the confidentiality and protection of supplier and employee whistle-blower are to be maintained.

**7. Privacy**

Suppliers are committed to protecting the reasonable privacy expectations of personal information of everyone suppliers do business with, including suppliers, customers, consumers and employees. Comply with privacy and information security law and regulatory requirements when personal information is collected, stored, processed, transmitted, ad shared.

**8. Non-Retaliation**

Suppliers should have a communicated process for their personnel to be able to raise any concern without fear of retaliation.

**9. Financial Records, Money Laundering and Insider Trading**

All business and commercial dealings are transparently performed and accurately recorded in the supplier's books and records. There is no actual or attempted participation in money laundering. No confidential information in the supplier's possession regarding DTC is used to either engage in or support insider trading

**E. MANAGEMENT SYSTEM**

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Suppliers shall adopt or establish a management system whose scope is related to the content of this Code. The management system shall be designed to ensure (a) compliance with applicable laws and



regulations; (b) conformance with this Code and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement.

The management system should contain the following elements:

**1) Company Commitment**

Corporate social and environmental responsibility policy statement affirming Supplier's commitment to compliance and continual improvement are endorsed by executive management.

**2) Management Accountability and Responsibility**

Supplier clearly identified company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on regular basis.

**3) Legal Requirements**

A process of identify, monitor and understand applicable laws and regulations, including the requirements of the Code.

**4) Risk Assessment and Risk Management**

Process to identify the environmental, health and safety and labour practice and ethics risks associated with Supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to the identified risks and regulatory requirements.

**5) Improvement Objectives**

Written performance objectives, targets and implementation plans to improve the Supplier's social environmental performance including a periodic assessment of Suppliers performance in achieving those objectives.

**6) Training**

Programs for training managers and workers to implement Supplier's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

**7) Communication**

Process for communicating clear and accurate information about Supplier's performance, practices and conditions covered by this Code and to foster continuous improvement.

**8) Worker Feedback and Participation**

Ongoing processes to assess employees' understanding of and obtain feedback on practices and conditions covered by this Code and to foster continuous improvement.

**9) Audits and Assessments**

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, and to content of the Code related to social and environmental responsibility.

#### **10) Corrective Action Process**

Process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

#### **11) Documentation and Records**

Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

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### **BREACH OF SUPPLIER CODE OF CONDUCT**

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Our goal is to build trust-based relationships with ethical Supplier Partners who follow these Guiding Principles. We expect our Supplier Partners to cooperate with our reasonable requests for information, certifications, and audit access.

Suppliers will be required to confirm that they have read and understood the policy and comply with its terms as part of their ongoing contractual. All relevant suppliers will be required to attend training to support the guidance in this policy.

When there is a concern, our practice is to work with the Supplier Partner. We may be able to help identify possible improvements. However, when a concern can't be corrected or a supplier partner is unwilling to engage, we reserve the right to end our relationship.

By working closely with our Supplier Partners, we believe we can achieve mutual success while helping communities and the wider world thrive.

#### **COLLABORATION**

- Where appropriate, DTC is prepared to work with suppliers to achieve collaborative relationships for the benefit of both businesses
- We welcome, rather than penalize, suppliers who strive to identify areas of non-conformance and develop proactive plans to achieve compliance
- Supplier Code of Conduct is issued to our suppliers
- Assessments are undertaken regarding compliance with company standards as part of the vetting process for new suppliers
- We also audit our key suppliers annually to assess ongoing compliance with the Supply Chain Policy and other relevant company standards
- Wherever possible, we work with our suppliers to support them to address weaknesses identified through identification of root cause and implementation of corrective actions.



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**WHISTLEBLOWING**

Report if you see irregularities such as -

- Products that are unsafe for consumers
- Bribery of DTC personnel, e.g.Purchaser
- Leaking Confidential Information
- Waste/ Water/ Air Pollution
- Mishandling Chemicals or Hazardous Materials
- Child Labour
- Unsafe Working Environment

Informants can report cases through the below whistleblowing channels:

Receiving Officer: General Manager  
Hotline : +65 97299116  
Email : [whistleblowing@dtc.com.sg](mailto:whistleblowing@dtc.com.sg)  
Wechat. : yeechin77  
Office Address: 7 Gambas Crescent, #05-24 ARK @ Gambas, Singapore 757087

Name & Signature : \_\_\_\_\_  
Designation : CEO

Name & Signature : \_\_\_\_\_  
Designation : Managing Director