

## Procurement Policy

Associates of Cape Cod, Inc.'s (ACC) efforts, along with collaboration with commercial partners, are essential for creating a stable supply of safe, useful, and high-quality products and services.

Accordingly, ACC has formulated a Procurement Policy which sets out the company's sustainability approach in procurement activities and reflects the company's practice of responsible procurement.

### Procurement

The purpose of this Policy includes raw and other materials, supplies, and all resources necessary for business. ACC will strive to abide by the content of this policy and, together with our commercial partners, encourage sustainable procurement.

#### 1. Scope of application

- Applies to all officers, and employees of ACC and its subsidiaries
- ACC encourages commercial partners of ACC to understand and comply with this policy

#### 2. Legal compliance and fair procurement activities

- Comply with the applicable procurement laws and regulations of the countries and regions where actively engaged in commercial activities

#### 3. Respect for human rights

- Respect the human rights of all involved stakeholders and encourage the development and maintenance of safe working environments for all contributors

#### 4. Environmental protection

- Engage in procurement activities that align with ACC's Environmental Policy and strive to understand and manage environmental impacts throughout the entire supply chain in collaboration with our commercial partners

5. Quality and safety assurance and fair selection of commercial partners

- Engage in procurement activities with the highest priority on quality and safety assurance. Support a fair and responsible procurement process that also considers impacts on society and the environment.

6. Information management

- Respectfully manages information obtained from business partners in procurement activities and work to build relationships of mutual benefit and understanding

7. Promotion of responsible procurement

- Support responsible procurement activities by engaging in initiatives consistent with this policy



President & CEO