

**SCOPE**

This Supplier Code of Conduct sets forth clear expectations, beyond the law, that persons, organizations, other entities, and their contracted workers that supply Black Diamond with products or services (“Suppliers”) are obligated to follow and provides the foundation for new and continued relationships with our suppliers.

**PURPOSE**

At Black Diamond, our sustainability goals and our core values establish the foundation of what we stand for and how we conduct ourselves with our customers, suppliers, and one another. Black Diamond recognizes that legal and cultural requirements vary in a global business environment and expects that our suppliers follow the applicable laws of their country or territory.

We at Black Diamond continually evaluate global issues and regulatory changes and will update suppliers when amendments to this code are made.

**ROLES AND RESPONSIBILITIES**

This Supplier Code of Conduct constitutes additional terms of a Supplier’s contract with Black Diamond, and Black Diamond asks suppliers to understand and act in accordance with it, as well as cascade these expectations through Suppliers’ own supply chain.

**POLICY****1. VALUES**

Black Diamond is committed to conducting its businesses in ways that, at a minimum, meet fundamental obligations in areas of human rights, labour, environment, anti-corruption, and ethical business practices.

The following principles, standards, and qualities describe the expected behavior from all Black Diamond employees and agents and the behaviors we expect from all our suppliers and their respective employees:

**Safety:** The health and well-being of our team members and the safety of our products are our top priorities.

**Quality:** We strive for excellence in our products, services, and all that we do.

**Integrity:** We act with honesty, transparency, and integrity, treating each other with respect in a diverse, equitable, and inclusive workplace.

**Accountability:** We take responsibility for our actions, seeking to build trust and earn a reputation for excellence and reliability.

**Teamwork:** We work with our team members, our supplier partners, and our customers to pursue mutual benefits.

**Sustainability:** We seek long-term success for our business, our communities, and the environment through responsible sourcing, lean manufacturing, and sustainable operations.

## **2. LAWS AND REGULATIONS**

Suppliers must operate in compliance with all the applicable laws and regulations of the countries in which they operate and in compliance with this Supplier Code.

## **3. HUMAN RIGHTS**

At Black Diamond, we are committed to respecting the human rights and dignity of individuals within our operations, the communities in which we do business, and our supply chain. Black Diamond expects all suppliers to have policies and processes in place to prevent, mitigate, and take effective measures to remediate adverse human rights impacts.

Black Diamond adheres to, and requires all suppliers to adhere to, the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, the Voluntary Principles on Security and Human Rights (VPSHR), the California Transparency in Supply Chains Act, and the Uyghur Forced Labor Prevention Act (UFLPA).

Black Diamond recognizes that human rights issues need to be communicated clearly and accurately to avoid false or misleading claims by an organization about the positive work being done to identify, assess and combat its modern slavery risks (“Freedom Washing”). Black Diamond expects suppliers to make accurate and truthful claims, have evidence to back up claims, not leave out or hide important information, explain any conditions or qualifications on claims, avoid broad and unqualified claims, use clear and easy to understand language, and remember visual elements should not give a wrong impression when addressing human rights issues.

### **3.1. Forced Labor**

Suppliers will not use slave, forced prisoner, bonded, indentured, or any other form of forced or involuntary labor. Suppliers will also not engage, directly or indirectly, in human trafficking. Suppliers will provide all workers with a written employment agreement or notification that contains a description of terms and conditions of employment as part of the hiring process, and foreign migrant workers will receive the employment agreement prior to the worker departing from their country of origin with no substitution or change(s) upon arrival in the receiving country except as required to meet local law. Employees must be free to terminate their employment without penalty.

### **3.2. Freedom of Movement**

Suppliers will not impose restrictions on entering or exiting company-provided facilities including, if applicable, workers’ dormitories or living quarters, except when lawful and necessary for safety or security purposes. Suppliers will refrain from restricting workers’ movement through the retention of bank payment cards or similar arrangements for accessing wages. Suppliers will also refrain, where reasonable, from requiring workers to use company-provided accommodation. Suppliers and their employment agencies, will not destroy, withhold, or conceal identity or immigration documents, such as government-issued identification, passports, or work permits.

### **3.3. Child Labour**

Suppliers and their employment agencies will not use child labor. 7005323 has a zero-tolerance policy regarding the use of child labor. Suppliers will implement an appropriate mechanism to verify that the age of workers and workers recruited comply with the ILO Minimum Age Convention (No. 138) and will provide substantiation of this verification upon request. If child labor is discovered in its supply chain, suppliers will cease employment of the child/children and take reasonable measures to enroll the child/children in a remediation/education program. Suppliers will not use workers under the age of 18 to perform work that is likely to jeopardize their health or safety. If workers under the age of 18 are found to be involved in work that is likely to jeopardize their health or safety, suppliers will take reasonable measures to immediately remove them from the situation and provide alternative work that will not jeopardize their health or safety.

### **3.4. Working Hours**

Suppliers will comply with local laws and collective bargaining agreements (where applicable) regarding working hours. Working hours must not exceed the maximum set by local law.

### **3.5. Wages and Benefits**

Suppliers will pay wages and provide benefits and compensation to workers that comply with all applicable wage laws and regulations, including those relating to minimum wages, overtime hours, medical leave, and legally mandated benefits, and consistent with the concepts in Article 7 of the International Covenant on Economic, Social and Cultural Rights. Suppliers will refrain from making any deductions from wages as a disciplinary measure or imposing any financial burdens on workers related to recruitment costs. For each pay period, suppliers will provide workers with a timely and understandable written wage statement that includes sufficient information to verify accurate compensation for the work performed. Workers shall receive equal pay for equal work, including paying a fair wage that meets or exceeds legal minimum standards. All use of temporary, dispatch and outsourced labor shall be within the limits of the local law. In the absence of local law, the wage rate for student workers, interns, and apprentices should be at least a substantially similar wage rate as other entry-level workers performing equal or similar tasks. Workers must be paid directly, in a timely fashion, and in recognized currency. Suppliers will keep records of worker hours and wage documentation in accordance with local law.

### **3.6. Human Treatments**

Suppliers will not engage in harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Suppliers will have disciplinary policies and procedures in place for any violations of these requirements that are clearly defined and communicated to workers.

### **3.7. Recruitment Practices**

Suppliers will not require workers to pay suppliers' agents' or sub-agents' recruitment fees or other related fees for their employment. Suppliers will provide full reimbursement to job seekers and current workers if they have been required to pay any such fees or related costs. If supplier uses a labor broker, the supplier will only use brokers that employ fair and transparent recruitment practices based on merit, comply with applicable laws, and do not withhold identity documents.

**3.8. Non-Discrimination / Non-Harassment**

Suppliers will be committed to a workplace free of harassment and unlawful discrimination. Suppliers will not engage in discrimination, harassment, intimidation, violence, or other adverse actions to employees based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, marital status or any other basis prohibited by law including in hiring and employment practices such as wages, promotions, rewards, and access to training.

**3.9. Freedom of Association**

Suppliers will comply with all applicable laws related to the rights of workers to form and join trade unions of their own choosing, to bargain collectively, to engage in peaceful assembly, as well as respect the right of workers to refrain from such activities. Suppliers will not threaten, intentionally intimidate, or use physical or legal attacks against stakeholders, including union members and union representatives, exercising their legal rights to freedom of expression, association, and peaceful assembly.

**3.10. Vulnerable Groups**

Suppliers will commit to protect the rights of vulnerable groups, including but not limited to, women, indigenous peoples, children, and migrant workers, within their businesses and supply chains. Suppliers will develop and implement internal measures to provide equal pay and opportunities throughout all levels of employment. Suppliers will also implement measures to address health and safety concerns that are particularly prevalent among women workers, including, but not limited to, preventing sexual harassment, and providing reasonable accommodation for nursing mothers.

**3.11. Human Rights Defenders**

Human rights defenders are individuals or groups who act to promote and protect human rights and fundamental freedoms through peaceful means. Suppliers will commit to neither tolerate nor contribute to threats, intentional intimidation, or use of attacks against human rights defenders in relation to their operations.

**3.12. Diversity, Equity, and Inclusion**

Black Diamond encourages suppliers to develop and promote inclusive cultures where diversity is valued and celebrated, and everyone can contribute fully and reach their full potential. Suppliers should encourage diversity in all levels of their workforce and leadership, including boards of directors.

**4. HEALTH AND SAFETY**

Black Diamond seeks to provide a safe workplace to our employees, which is a priority at Black Diamond. Similarly, Black Diamond expects that the occupational health and safety of its Supplier's own employees is a priority throughout all significant aspects of its activities and in all locations in which Suppliers conducts business or has employees. Suppliers are expected to meet or exceed all applicable health and safety laws, regulations, and standards and implement appropriate policies, standards, procedures, contingency measures, and management systems to reduce incidents. Suppliers will take appropriate remedial action in the event of non-compliance, seeking to prevent occupational illnesses and work-

related accidents and to provide a safe and healthy workplace to their employees. Suppliers will have tracking tools that drive to a goal of zero workplace safety incidents.

#### **4.1. Occupational Safety**

Suppliers will identify, assess, and mitigate worker potential for exposure to all significant health and safety hazards, which may include eliminating the hazard, substituting processes or materials, controlling through design, implementing engineering and administrative controls, preventative maintenance, and safe work procedures (such as, lockout/tagout). Suppliers will provide occupational health and safety training prior to the beginning of work and periodically afterwards. Health and safety related information is expected to be clearly posted in the facility or placed in a location identifiable and accessible by workers. Where hazards cannot reasonably be adequately controlled by the means described above, suppliers will provide workers with appropriate, well maintained, personal protective equipment (PPE) and associated training on how and when it needs to be applied. Suppliers will also provide communication and training to their workforce regarding the risks to them associated with these hazards.

#### **4.2. Emergency Preparedness**

Suppliers will work to actively identify and assess potential emergency situations and events and minimize their impact by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Suppliers will execute emergency drills at least annually or as required by local law. Emergency plans should include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans.

#### **4.3. Physically Demanding Work**

Suppliers will identify, evaluate, and control worker exposure to the hazards of manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks.

#### **4.4. Machine Safeguarding**

Suppliers will evaluate production and other machinery for safety hazards regularly. Physical guards, safeguarding devices, and barriers must be provided and properly maintained where machinery presents an injury hazard to workers.

#### **4.5. Sanitation, Food, and Housing**

Suppliers will take reasonable measures to provide workers with ready access to clean toilet facilities, potable water, and sanitary eating facilities. Any worker dormitories or living quarters provided by suppliers should also be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting and heat and ventilation, and individually secured accommodations for storing personal and valuable items.

#### **4.6. Occupational Injury and Illness**

Suppliers should have procedures and systems to prevent, investigate, root cause, manage, track, and report occupational injury and illness, including provisions to encourage worker reporting, classify and

record injury and illness cases, provide necessary medical treatment, investigate cases, and implement corrective actions to eliminate their causes, and facilitate the return of workers to work.

#### **4.7. Product Safety**

Suppliers will promptly communicate to Black Diamond any safety concern related to products or services provided to Black Diamond which may impact the safety of Black Diamond facilities, products, and services.

### **5. CONFLICT AND CRITICAL MINERALS**

Responsible mineral sourcing can fuel growth and generate income for local communities. At the same time, mineral sourcing operations are at risk for serious human rights and financial abuses including funding armed terrorist groups. We expect suppliers to adhere to a Conflict and Critical Minerals Policy.

### **6. ENVIRONMENT**

Black Diamond is committed to monitoring and reducing our direct environmental impacts especially with regards to air emissions, raw material use, and waste generation and encourages Suppliers to do the same. Suppliers must comply with all environmental laws and regulations in the locations in which they conduct their business.

### **7. ANTI-CORRUPTION**

Black Diamond maintains impartial and fair relationships, does not give, promise, or offer to give anything of value to obtain business advantage, does not act with the intention to hide or conceal anything of value offered to anyone, and takes affirmative steps to prevent such actions. Black Diamond expects suppliers to compete on the merits of their products and services. Suppliers must not use the exchange of business courtesies to gain an unfair competitive advantage. In all business relationships, suppliers must ensure that the offering or accepting of any gift or business courtesy is permitted by applicable laws and regulations, and that these exchanges do not violate the rules and standards of the recipient's organization and are consistent with reasonable marketplace customs and practices. No cash gifts or cash equivalent should be offered or accepted.

Black Diamond expects our suppliers to have their own anti-corruption policy and will not work with organizations we consider do not share our commitment to preventing bribery and corruption.

### **8. INSIDER TRADING**

Suppliers and their personnel must not use any material or non-publicly disclosed information obtained in the course of their business relationship with Black Diamond as the basis for trading or for enabling others to trade in the stock or securities of any company.

### **9. CONFLICT OF INTEREST**

A conflict situation can arise when a supplier has interests that may make it difficult to perform their work objectively and effectively or where doing business with Black Diamond could damage Black Diamond's reputation. This includes a conflict between Black Diamond's interests and the interests of a supplier, a supplier's employees or its employees' close relatives, friends, or associates. We expect suppliers to avoid all conflicts of interest or situations that give rise to the appearance of a potential

conflict of interest. Suppliers must provide immediate notification to all affected parties in the event that an actual or potential conflict of interest arises.

**10. RESPECT AND COLLABORATION**

Black Diamond believes that successful business relationships are the result of mutual goals and values and built upon respect and collaboration. We also believe every Supplier relationship is an opportunity to extend our enterprise and grow our mutual businesses. We expect open, honest, and timely communication with our Suppliers, which is necessary to build relationships and collaborate effectively.

**11. MONITORING AND COMPLIANCE**

Black Diamond expects suppliers and their employees to adhere to this Supplier Code. Any person with reason to believe that the obligation or principles of this code are not being respected is asked to report to this to Black Diamond immediately.