



Due Diligence and Code of Conduct

The One-Shot Corporation Limited

As a market leader in our industry, we hold high standards in regard to our ethics and legal responsibilities. In order to comply with these responsibilities and protect who we do business with, we have set out the minimum standards we expect from our distributors, suppliers and third parties.

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About Us

One-Shot® brand is a division of the One-Shot Corporation Limited, our UK based headquarters with UK based manufacturing, which works with our strategic international partners and overseas licensed manufacturing facilities in key global locations.

With green issues firmly on the agenda, we want to highlight the environmental benefits that our pods provide. Our One-Shot® pods are recyclable, period. Thanks to the design of our pods no sanitizing is required and food safety is always our number one priority.

That's right, our dispensers require no sanitizing, so if you think about all the wasted chemicals, liquid mix and water poured away from the soft serve machine sanitizing process, we are actually helping to save the environment from all that liquid waste that is quite frankly poured down the drain.

Our Mission

As a market leader in our industry, we hold high standards in regard to our ethics and legal responsibilities. In order to comply with these responsibilities and protect who we do business with, we have set out the minimum standards we expect from our suppliers and third parties.



Expectations of Our Distributors and Partners

This partner code of conduct is designed to clearly set out the standards we need from our partners, distributors and third parties. The standards and practices set out in this code are there to protect us, our partners, our customers and any other third parties we work with.

We ask that our distributors and partners meet or exceed these standards and reflect them within all business operations.

We may occasionally review relevant business standards of our partners and ask that they provide appropriate access to do so. We do this so that we can regularly observe the standards of our partners and assess where improvements could be made.

Standards of Conduct

We expect our partners to comply with, or exceed, the standards set out in this code at all times:

Compliance with Laws

Our distributors, suppliers and third parties must comply with all applicable laws and regulations. This includes international laws if a partner is based or operates internationally.

Subject to applicable laws we require our partners to formally notify us of any criminal or legal action against the organisation, or if the organisation is sanctioned by a regulator.

Anti-Bribery and Corruption

We are committed to conducting business honestly and professionally alongside our partners and have zero tolerance towards bribery and corruption. Our partners should apply the highest standard of ethical conduct and integrity throughout their business activities, and adhere to all applicable bribery, corruption and fraud laws.

The One-Shot Corporation, our employees and our partners are subject to the UK Bribery Act 2010. We expect our partners and distributors to adopt and maintain appropriate procedures to prevent fraud, bribery and corruption throughout their business.

Measures we expect our partners and distributors to implement include:

- Implementation and awareness of procedures that flag possible bribery and corruption activities;
- Ensuring all employees and associated are aware of anti-bribery laws and policies enforced within the organisation;
- Where possible our partners should inform us of any bribery, corruption or fraudulent activity that occurs in connection with The One-Shot Corporation or any of its customers.

Gifts and Hospitality

Before offering or accepting gifts partners should make sure that it is unlikely to improperly influence the business relationship or any decision making. We expect our partners and distributors:

- *to make their anti-bribery policy and details on gifts and hospitality available when necessary and possible;*
- *to under no circumstances offer gifts, money or hospitality on behalf of The One-Shot Corporation;*
- *to report any suspicious or overly lavish gifts offered by or to our employees.*

Insider Trading

Our partners and distributors must have systems in place to ensure their employees do not engage in insider dealing and comply with the EU Market Abuse Regime.

Money Laundering

Our partners, distributors and their employees must not process or accept any funds that are suspected to be illegal, and only deal with legitimate business activities and funds.

Sanctions

Our suppliers, distributors and partners and their third parties must comply with applicable laws and regulations and not transact with those on the targeted sanctions list.

Competition

Our suppliers, distributors and partners must be fully compliant with anti-trust and competition laws as they apply to their own and The One-Shot Corporation's business activities, including attempting to lock out parts of the supply chain or fix prices.

Conflicts of Interest

When we do business with our partners we expect all parties to inform us of any potential conflicts of interest.



Employees and Working Conditions

Our distributors and partners must comply with international standards of human rights.

Equal Treatment

Our distributors and partners must ensure that all workers are treated fairly and equally. For example, selecting workers based on ability and not on any personal characteristics such as sex, race, colour, ethnic origin, sexual orientation, gender identity, pregnancy, religion, trade union activity, political beliefs, disability or age.

We expect a zero-tolerance approach to violence, bullying, intimidation and abuse at work and to any other form of verbal, non-verbal or physical harassment or discrimination.

Slavery, Trafficking and Forced Labour

Distributors and partners must not participate in any form of human slavery or human trafficking and partners and their directors must prohibit the same within the supply chain. Partners must strictly comply with any laws or conventions relating to the same and must not engage workers involuntarily or adopt practices that suggest forced or compulsory labour.

Workers should not be required to hand over passports, ID cards or work permits as a condition of employment and they must be free to leave on giving reasonable notice.

Distributors and partners must establish and implement appropriate systems to ensure that no involuntary or forced labour, slavery or human trafficking is employed or otherwise used within the supply chain.

Freedom of Associating

Distributors and partners must ensure that workers are allowed to associate freely and bargain collectively in accordance with local laws and regulations. In countries where the right to freedom of association or to bargain collectively is restricted under local law, you must allow your workers to freely elect their own representatives.

Workers should be able to communicate with management teams without fear of harassment, reprisal or intimidation.

Health & Safety

Distributors and partners must provide safe working conditions for all workers in line with international standards so that workers are protected from hazards. Distributors and partners must adopt and maintain appropriate health and safety management systems as well as monitoring and reporting any incidents.

Distributors and partners should also conduct regular risk assessments to evaluate health and safety matters and take action to manage identified risks and improve.

Terms of Employment

Distributors and partners must ensure that workers are provided with a written employment contract prior to commencing work, and that the contract is in a language understood by the worker. Workers must also be given access to grievance systems to enable matters to be fully investigated to fair resolution.



Child Labour

In no circumstances shall our distributors and partners use child labour (young people 15 or under, unless acceptable to the International Labour Organisation) within your business. We expect you to respect and comply with applicable laws and regulations concerning the minimum age of workers.

Where young workers are lawfully employed they should be guaranteed proper working hours, wages and safe working conditions.

Distributors and partners must also ensure that persons under the age of 18 do not carry out hazardous work (for example work which exposes them to physical, psychological or sexual abuse, work underground or underwater, at dangerous heights, in confined spaces or with dangerous machinery, equipment or tools).

Working Hours and Payment

All workers (and those within the supply chain) must be paid at least the minimum wage in their country of employment and paid overtime in accordance with local legal requirements or applicable collective agreements. Workers must not, except in exceptional circumstances, be required to work excessive hours during their working week and must be given regular rest days in accordance with local laws.

Conflict Minerals

To the extent applicable to business activities, distributors and partners must have in place appropriate policies and procedures to prevent against the acquisition of conflict minerals or unsustainable mined minerals in your supply chain.

Land Rights

We expect distributors and partners to respect the land rights of indigenous communities.

Environment

We are committed to protecting the environment and believe that we can make major contributions to a more sustainable world. We actively work to improve the environmental performance of our operations, projects, products and services during their entire life cycles.

We expect our partners to conduct their operations in an environmentally responsible manner and in accordance with applicable environmental laws.

You should strive to minimise your environmental impact and continuously work to improve your environmental and climate performance. You should also work towards resource efficiency and sustainable waste management.



Data Security and Privacy

Privacy

Our partners must ensure that they have policies, procedures and processes in place to ensure that they comply with the relevant data protection laws in their jurisdiction. When processing data (leads) from European citizens you must ensure that you are compliant with the General Data Protection Regulation.

We respect everyone's right to the protection of their personal data and the right to integrity in connection with processing of personal data. The definition of personal data, and the legal requirements for safeguarding it, vary by country. It could include someone's names, personal healthcare information, photographs or identity number.

You must ensure that all uses of personal data – such as collection, registration, comparison, storage and deletion, or a combination of these – take place in accordance with applicable laws and regulations.

Privacy Principles



Our partners and third parties must abide by our Privacy Principles:

Accountability - We are accountable for living up to Privacy Principles when working with our partners and suppliers.

Fairness and lawfulness - we comply with privacy laws, and we will work with governments, regulators, policy makers and opinion formers for better and more meaningful privacy laws and standards. In cases where we share data we will be governed by a relevant data processing sharing agreement.

Openness and honesty - we communicate clearly about actions we take that may impact privacy.

Choice and access - we give people the ability to make simple and meaningful choices about their privacy and allow them – where appropriate – to access, update or delete their personal data.

Privacy by design - Respect for privacy is a key component in the design, development and delivery of our products and services.

Responsible data management and limited disclosure - we apply appropriate data management practices to govern the processing of personal data. We limit disclosures of personal data to our partners to what is described in our privacy notices or to what has been authorised by our customers.

Security safeguards - We implement appropriate technical and organisational measures to protect personal data against unauthorised access, use, modification or loss.

Balance - when we are required to balance the right to privacy against other obligations necessary in a free and secure society, we work to minimise privacy impact.

Notification of Data Breaches

Our partners must adhere to the relevant supervisory authorities' procedures in the case of a data breach and must inform us of any breach that results from our partnership as soon as they become aware of it. Partners are also expected to inform us of any sanctions, fines or penalties imposed upon them as a result of their data practices.

Complying with the Code

Our partners are expected to respond with transparency and facilitate any reasonable request made to prove your compliance with any part of the code of conduct.

Outcomes of Non-Compliance

Where we reasonably believe that you are not acting in compliance with this code, we will seek to raise the matter with you to try and rectify the issue.

Non-compliance with this code will be considered a material breach of contract. In addition, we reserve the right to end our business relationship with you if you are non-compliant with this code in circumstances where:

- (i) such non-compliance has or may have an adverse impact on our business (for example damage to our reputation, employees, customers, shareholders or supply chain) or the communities that we serve;
- (ii) you have repeatedly breached this code and have failed to take appropriate steps to raise standards to ensure compliance with this code;
- (iii) you have undertaken any illegal activity or failed to comply with applicable laws and regulations.

How Do Partners Raise and Report Concerns?

Any suspected or confirmed breach of this code of conduct must be reported to us as soon as possible. We value transparency and open communication and encourage our partners and employees to reach out to us with any concerns.

You can contact us to ask a question, raise a concern, or report a breach by;

Calling: +44 (0)1732 525 925

Emailing: privacy@one-shot.com

Post: 70 Churchill Square
Kings Hill
West Malling
Kent, ME19 4YU