SUPPLIER CODE OF CONDUCT

This document is available in multiple languages and may be updated from time to time. For the avoidance of doubt, the English version published and distributed by Ham Choi Imports, LLC, Management is always leading.

Dear Ham Choi Imports, LLC. vendors and suppliers,

As the international business world becomes more transparent, social and ethical responsibility has become paramount for our multicultural / multinational business partners.

In order for Ham Choi Imports, LLC. (HCI) to reflect this responsibility in the way we go about our business, we must take steps to ensure that our business is being conducted with integrity and with respect. We have formalized this in our Supplier Code of Conduct.

Companies doing business with HCI are required to accept and comply with the HCI Supplier Code of Conduct below. Together we have to ensure that we live by our Code of Conduct and the values it represents.

In case you have any questions or concerns, please do not hesitate to discuss these with your manager or anyone in our management team.

Thank you and kind regards.

Richard Teng
Co-founder of Ham Choi Imports, LLC.

Ham Choi Imports, LLC.
2467 Sequester Ct., San Jose, CA 95133

HCI has a ‘zero tolerance’ policy when it comes to unethical business behavior, such as bribery, corruption and forced labor. We expect all of our suppliers/vendors to adhere to similar standards and to conduct their business ethically.

As a supplier/vendor, you must comply with all applicable laws and regulations, the requirements set out in this Supplier Code of Conduct as part of your contractual obligations to us.

This Supplier Code of Conduct defines the main principles underlying your business activities as one of our suppliers/vendors, and informs the following:

- That you may not engage in corrupt practices
- That you must disclose information on any situation that may appear to present a conflict of interest
- That HCI has a zero-tolerance policy with regards to the acceptance of gifts or hospitality from Vendors
- That there are restrictions on the employment by Vendors of former HCI staff members.

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Ham Choi Imports, LLC. Suppliers' Code of Conduct

1) Compliance with Laws and Regulations
- Accounting practices
- Competition compliance
- Intellectual property
- Disclosure

Suppliers' business operations, as well as all products and services supplied to Ham Choi Imports, LLC. (HCI), must fully comply with the laws and regulations of the countries where suppliers' operations are based as well as where goods and services are provided to HCI.

All financial and business records must be accurately maintained in accordance with applicable laws and regulations, as well as generally accepted accounting principles.

Fair competition must be practiced in accordance with local laws and activity that restricts competition must be avoided. Commercial decisions, including prices, terms of sale, division of markets and allocation of customers, must be made independent of understandings or agreements with competitors.

2) Ethics and Conflict of Interest
- Anti-corruption
- Financial integrity
- Confidentiality
- Relationship of business partners with company

Business dealings must be handled with integrity, transparency and honesty. No form of fraud, corruption, bribery, extortion or other behavior involving improper benefits will be tolerated. Any situation that has actual, perceived or potential conflict of interest must be disclosed to HCI.

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Any information used in the business relationship with HCI that is non-public and proprietary must be protected against loss and infringement. Any form of disclosure or use other than for officially stated purposes must first be authorized by HCI.

Any form of relationship with a competitor, distributor, supplier or any other entity with which HCI has a business relationship must not interfere with the provision of products and services to HCI and should demonstrate high standards of ethical business behavior.

3) Safety and quality
- Health and safety
- Quality of products and services

Health and safety protection policies and management systems must be in place by suppliers to provide a secure working environment. They must be designed to promote the general health of employees and reduce work-related injury and illness. For example, protective equipment and tools must be provided and replaced/maintained regularly.

The safety of all products and services must be ensured through appropriate policies, implementation and monitoring.

Policies and management systems must be developed to ensure that the quality of all products and services are as specified in the supply agreement.

4) Environment
- Compliance with laws and regulations
- Engagement in environmental management processes

Local environmental laws and practices such as those pertaining to waste disposal, air emissions and pollution must be complied with. Suppliers must endeavor to minimize the impact of their operations on the environment.
Environmental management is a key parameter that HCI looks at when selecting its suppliers.

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5) Labor Standards
- Equal opportunity
- Non-discrimination
- Minimum age/child labor/forced labor
- Working hours
- Wage standards

Employees must not be subjected to discrimination based on race, national origin, ethnicity, religion, gender, age, marital status, sexual orientation, disability or any other reason.

- All employees must meet the local legal minimum labor age.
- Forced, coerced, bonded, indentured, involuntary prison labor or otherwise must not be used.
- Employee working hours, including considerations for voluntary overtime work, and the granting of leave of any form, must be in accordance with applicable local and/or national laws.
- Salaries must not be less than standards specified by local laws.

6) Subcontractors and other service providers
- Compliance with Code of Conduct
- On-time payment

Subcontractors and service providers must also adhere to the principles set out in this Code of Conduct. Subcontractors and service providers must be paid accurately and promptly.

7) Inspections and corrective actions
In order to ensure and demonstrate compliance with the Ham Choi Imports, LLC. Supplier Code of Conduct, you shall keep record of all relevant documentation, and provide to us supporting documentation upon request.

To verify your compliance, we reserve the right to audit and inspect your operations and facilities, at our own cost and upon reasonable notice, with or without support of a third party. If the results of such an audit or inspection cause us to be of the opinion that you do not comply with this

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Supplier Code of Conduct, you shall take necessary corrective actions in a timely manner, as directed by HCI.

If you fail to comply with this Supplier Code of Conduct, then we may take action against you, including suspending or terminating your activities as one of our suppliers.

This Code of Conduct does not create any binding obligations on HCI.

Supplier/Vendor: _____

Represented by: _____

Position: _____

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