

Last Revision Date: April 9, 2020

# **Code of Vendor Conduct**

#### **AUDIENCE**

This Code of Vendor Conduct applies to all officers, directors, and employees of Dollar Tree, Inc. and each of its subsidiaries, including Family Dollar Stores, Inc. (jointly, "Dollar Tree") as well as manufacturers, service providers, contractors, subcontractors, suppliers, partners, and factories (collectively, "Vendors") that do business with Dollar Tree, regardless of geographic location.

#### **PURPOSE**

Dollar Tree's Board of Directors and executive management have adopted this Policy to demonstrate their commitment to ensuring that every link in our supply chain understands and agrees to abide by Dollar Tree's expectations with respect to product safety and quality, ethical and socially responsible sourcing, and compliance with all applicable laws and regulations, including anti-bribery and anti-corruption laws. While Dollar Tree recognizes that there are different legal and cultural environments in which our Vendors operate, this Code sets forth the basic requirements that all Vendors must meet in order to do business with our Company. Dollar Tree has developed this policy in concert with our stakeholders, including Vendors and Associates, and with guidance from internationally accepted labor standards, including the United Nations Universal Declaration of Human Rights, the Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the International Labor Organization Declaration on Fundamental Principles and Rights at Work.

## **POLICY**

Dollar Tree encourages all Vendors to post this Code of Vendor Conduct. All of Dollar Tree's direct import vendors are required to post this Code of Vendor Conduct in English and in the shared language(s) of its employees in a common area at all facilities that manufacture, source or provide products to Dollar Tree.

## I. COMPLIANCE WITH LAWS

Vendor's operations and those of its sourcing operations and/or factories shall comply with all applicable laws and regulations of the country and its government authorities where they are located. Such laws include, but are not limited to, employment, labor, environmental, intellectual property, and anti-bribery and anti-corruption laws and regulations.



#### II. WORK AND RESIDENTIAL ENVIRONMENT

Vendors shall provide a safe and healthy workplace for its employees. Where necessary, Vendor shall engage on-site security personnel, including workers hired directly by the facility or workers hired by a third-party service provider, to conduct routine and emergency activities in a way that ensures the highest levels of safety and security while also protecting the dignity of the worker. Vendors who provide dormitory and/or residential facilities for their workers must ensure these facilities are safe, healthy and in compliance with local and national standards. Vendors must promote employee health and safety through internal training and awareness programs.

#### III. EMPLOYEE DISCIPLINE

Vendors shall not use physical corporal punishment, force that causes bodily harm or pain, or other forms of physical contact to punish or coerce workers. Vendors shall not engage in or permit psychological coercion or any other form of non-physical abuse, including threats of violence, sexual harassment, screaming, or other verbal abuse. Employees shall be treated with dignity and respect at all times.

## IV. NON-DISCRIMINATION

Vendors shall hire, promote, pay wages and benefits, terminate, and provide access to trainings, without regard to race, color, gender, nationality, religion, age, maternity, marital status, indigenous status, ethnicity, social origin, disability, sexual orientation, HIV/AIDS status, or membership in workers organizations including unions or political affiliation. Vendors shall ensure that hiring, promotion, and other human resource decisions shall be made on the workers' qualifications, skills, ability, productivity, and overall job performance. Workers with the same qualifications, skills, experience, and performance shall receive equal pay for equal work in accordance with applicable labor laws.

## V. LABOR AND WORKERS' RIGHTS; FREEDOM OF ASSOCIATION

Vendors shall abide by all applicable local, state and national laws respecting the rights of workers. Vendors must develop internal programs, policies and procedures that clearly define their business practices, including age and legal right to work in the country, and provide employees with a viable means of managing conflict and resolving disputes. Vendors must respect the legal rights of employees to freely and without harassment participate in worker organizations of their choice.

#### VI. WORKING HOURS



Vendors may not require employees to work hours that exceed local, state or national laws or business customs. Vendors must maintain a workweek consistent with normal hours of operation for their industry, with compensated overtime, in compliance with local and national laws. Labor, including overtime, shall be voluntary at all times. The facility shall ensure that all legally required daily rest periods are provided to all workers.

## VII. WAGES & BENEFITS

Vendors shall provide wages and benefits in compliance with local, state and national laws and be committed to the betterment of wage and benefit levels and provide a living wage for workers and their families.

## VIII. CHILD AND FORCED LABOR

Dollar Tree has a zero-tolerance policy for slave, child, under age, forced, prison, bonded or indentured labor. Child labor is defined as either being below the local minimum working age, or below the age of 15, whichever age is greater. Vendors shall ensure that if facility entrances are guarded for security reasons, workers are free to leave at all times. Vendors shall not employ tactics to prevent workers from leaving at will, such as withholding salary or charging a penalty when workers terminate their contract, or by withholding any personal identification documents such as IDs and passports. Vendors shall ensure that workers can use the toilets, drink water, and take designated breaks.

## IX. COUNTRY OF ORIGIN

Vendors shall not use deceptive trade practices to deliberately misrepresent country of origin in order to evade quota or other import restrictions or duties on any product(s) that will be sold in our stores.

#### X. ENVIRONMENTAL

Vendors must, at a minimum, be fully compliant with all applicable environmental regulations, including international treaties and protocols in addition to local laws and regulations. In addition, vendors must comply with any additional guidelines provided by Dollar Tree which may exceed standards set forth in existing laws and regulations. Vendors are encouraged to conserve energy and natural resources and to dispose of waste safely and responsibly.

#### XI. ANTI-CORRUPTION

Vendors must not tolerate, permit, or engage in bribery, corruption, or unethical practices whether in dealings with public officials or individuals in the private sector. Dollar Tree associates and their agents must comply with all applicable anti-corruption laws, including the



U.S. Foreign Corrupt Practices Act ("FCPA"), which prohibits offering anything of value to officials, political parties, or candidates in foreign countries in return for favors for a company.

XII. AUDITS, MONITORING, AND OTHER MANAGEMENT SYSTEMS FOR THE PREVENTION OF VIOLATIONS OF THE CODE OF VENDOR CONDUCT

Dollar Tree has corporate systems in place to monitor compliance with, and prevent violations of, the policies set forth in this Vendor Code of Conduct, specifically including its anti-corruption and anti-bribery policies.

<u>Training</u>: In addition to this Vendor Code of Conduct, Dollar Tree's Code of Ethics (which can be found at https://www.dollartree.com/file/general/Dollar\_Tree\_Code\_of\_Ethics.pdf) specifically addresses the Company's positions on anti-bribery and anti-corruption, non-discrimination, child and forced labor and environmental compliance. The Code of Ethics is distributed annually and every Dollar Tree associate must read and acknowledge it annually. The Company also conducts periodic Code of Ethics training. Dollar Tree also trains the associates in its merchandising and global sourcing organization annually about FCPA compliance, slavery, forced and child labor and the other policies set forth in this Code of Vendor Conduct.

## **Audits and Testing**

Dollar Tree is committed to providing quality products to our customers. Dollar Tree has a Quality and Regulatory Compliance Process for its directly imported products that includes robust auditing and testing standards, as well as corrective action plans, to ensure Vendors comply with applicable law, regulations, industry standards and Company requirements. Factories must be certified by Dollar Tree before order commitments can be made. As part of the certification process, Dollar Tree requires all of its overseas suppliers to complete questionnaires so that Dollar Tree can evaluate the vendor's business practices relating to, among other things, child labor, forced labor or slavery, the health and safety of workers, non-discrimination, disciplinary practices, working hours and overtime, worker compensation and benefits, and compliance with environmental laws and regulations. Dollar Tree also conducts Social Compliance Audits in many of its overseas' factories to assess labor practices, workplace conditions, treatment of employees, safety of employees, working hours and wages, and slavery, forced and child labor, and sustainability.

Examples of the Company's testing programs include:

- A Foreign Supplier Verification Program (FSVP) Report is required for foreign factories producing human and animal food where the Company is the Importer of Record. The FSVP Report is reviewed and updated based on season or new orders.
- Most imported toys and children's products require an enhanced 4-part testing process for each production run, and all tests must pass prior to a product being released.



- Dollar Tree has made a corporate commitment to eliminate the following 17 chemicals of high concern from all private label products: Lead in children's products; 1,4-dioxane; Asbestos in children's products; Nonylphenol ethoxylates; Bisphenol A in children's products; Cyclic aliphatic bromides cluster; Formaldehyde; Toluene; Cadmium and Cadmium compounds; Butyl parabens;1-Bromopropane; Octamethylcyclotetrasiloxane (D4); Di-ethyl phthalate; Tetrachloroethylene (PERC); Di-butyl phthalate; Trichloroethylene; Propylparaben. Presence of these chemicals is monitored during 3rd party testing.
- Conflict Minerals: Dollar Tree neither manufactures nor contracts to manufacture
  products covered by the Conflicts Minerals rules set forth in Section 1502 of the DoddFrank Act. Dollar Tree requires, however, that if a Vendor's product contains tin,
  tantalum, gold or tungsten, such conflict minerals may not be sourced from the Congo
  Region. Vendors may be required to disclose the origin of such minerals.

All suppliers are responsible for maintaining the documentation necessary to show compliance with applicable regulations, including copies of test reports.

#### REPORTING AND NON-RETALIATION

Dollar Tree prohibits retaliation against any Associate who, in good faith, reports an actual or suspected violation of this Code of Vendor Conduct.

Concerns about any violations of this Code of Vendor Conduct, including any ethical issues, bribery, corruption, or violations of laws, should be reported using:

- the Dollar Tree Speak Up Line at 1-888-835-5792
- the Family Dollar Speak Up Line at 1-877-309-2962
- CodeofConduct@familydollar.com or
- CodeofEthics@dollartree.com.