

The *WALT DISNEY* Company

SUPPLY CHAIN CODE OF CONDUCT



INTRODUCTION

Throughout the years, we have earned the trust of guests, audiences, consumers, and shareholders because of our commitment to high standards in everything we do and everywhere we operate. Integrity, honesty, trust, respect, and teamwork—these define not only the operating principles of our Company, but also the spirit of how we function.

Disney is committed to respecting human rights, protecting the planet, and delivering a positive environmental legacy for future generations as we operate and grow our business. Our Supply Chain Code of Conduct (“Code”) is influenced by our Human Rights Policy and environmental commitments, along with a range of other responsible business expectations available at [impact.disney.com](https://www.disney.com/impact).

We consider "Suppliers" to include any person or entity engaged in the production or provision of materials, components, products, or services that Disney acquires, authorizes or licenses. We expect that all such parties recognize their responsibility to respect human rights in accordance with the United Nations’ *Guiding Principles on Business and Human Rights* and as set forth in the International Labour Organizations’ *Fundamental Principles and Rights at Work* and the Organisation for Economic Cooperation and Development’s *Guidelines for Multinational Enterprises*.

We expect our Suppliers to uphold our standards. We also seek to collaborate with Suppliers around the world to prevent, mitigate, and remedy adverse human rights impacts as well as reduce the environmental impacts of our operations, products, services, and supply chains.

We expect Suppliers to comply with applicable laws and regulations including, but not limited to, those pertaining to the manufacture, processing, pricing, sale, import, export, and distribution of products, components, or raw materials. In certain areas, the Code’s standards for Suppliers may surpass local law.

The Code sets expectations for Suppliers of The Walt Disney Company and its subsidiaries and affiliates and their respective brands. The Code will be integrated into our business operations as appropriate, including through a range of specific measures to monitor compliance.

HUMAN & LABOR RIGHTS

Human Rights

Suppliers should be familiar with the United Nations' *Guiding Principles on Business and Human Rights* and should exercise due diligence to identify, prevent, mitigate, and account for how Suppliers address actual or potential adverse human rights impacts through its own activities, or those directly linked to its operations, products, or services through its business relationships.

Child Labor

Suppliers must not use child labor. This includes the labor of anyone younger than the age of 15, younger than the local legal minimum age for employment, or younger than the age for completing compulsory education, whichever is the highest age.

Forced Labor

Suppliers must not use any forced or involuntary labor. Forced or involuntary labor includes work performed by any person who is under the threat of penalty or coercion or work for which any person has not offered themselves voluntarily. Examples include, but are not limited to, prison, bonded, indentured or coerced labor. Forced labor may include the abuse of vulnerability, deception, restriction of movement, isolation, physical or sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage (including the payment of recruitment fees or abusive working or living conditions), or forced or excessive overtime. Suppliers that employ migrant workers must ensure that migrants are not hired through fraudulent recruitment practices or pay recruitment fees.

Discrimination

Suppliers must not discriminate in hiring and employment practices, including with respect to salary, benefits, training and advancement, discipline, termination, or retirement, on the basis of race, religion, color, sex, sexual orientation, gender identification, national, social or ethnic origin, age, marital status, military or veteran status, disability, pregnancy, union membership, political affiliation, or any other basis prohibited by applicable law.

Freedom of Association and Collective Bargaining

Suppliers must respect the rights of workers to choose whether to join, associate, organize or participate in collective bargaining in a lawful and peaceful manner, without penalty, harassment, discrimination, or interference. Workers should be able to carry out their representative functions in the workplace.

Harassment and Abuse

Suppliers must treat each worker with dignity and respect and not use corporal punishment, threats of violence, or other forms of physical, sexual, psychological, or verbal harassment or abuse. Special attention should be paid to vulnerable groups, including, but not limited to, women, younger workers, migrants, and Indigenous peoples.

Health and Safety

Suppliers must provide workers with a safe and healthy workplace, taking all necessary steps required to ensure prevention or mitigation of injury or accidents that may arise from the course of their work, as well as provide guidance on proper chemical management and disposal. At a minimum, Suppliers must provide workers with adequate and accessible restrooms, potable water, sanitary food preparation, storage and eating facilities, personal protective equipment, safe machinery and tools, training to prevent and mitigate accidents, adequate temperature control and ventilation, and sufficient lighting.

Suppliers must ensure that all living and dormitory spaces are clean, safe, and fit for the purpose. Spaces must be secure and allow reasonable freedom of movement to enter and exit.

Suppliers should create, maintain, and execute emergency preparedness plans and procedures that are understandable to workers and clearly communicate the response procedures for various emergencies that may occur including fires, natural disasters, security, and health-related events. Suppliers should regularly assess whether buildings are structurally sound.

HUMAN & LABOR RIGHTS

Wages and Benefits

Suppliers must comply with all applicable wage and benefits laws and regulations, including those relating to minimum wages, overtime, piece rates, and other elements of compensation.

Suppliers must ensure workers are compensated for overtime hours at such premium rate as is legally required or, if there is no legally prescribed premium rate, at a rate higher than the regular hourly compensation rate.

Withholdings or deductions from pay must be lawful, clearly communicated to workers, and must not be used as a form of punishment or to otherwise impede workers' rights.

Suppliers must ensure workers are provided all legally required benefits including, but not limited to, family leave, illness, healthcare, vacation, and unemployment. Suppliers must ensure that employer contributions are paid in an accurate, timely, and clearly communicated manner.

Working Hours

Suppliers must comply with all applicable working hour laws and regulations, provided that regular working hours do not exceed 48 hours per week and, on an exceptional basis, overtime hours do not exceed 12 hours per week.

Suppliers must provide workers with at least one day of rest after 6 consecutive days of work.

Worker Communications and Engagement

Suppliers should take appropriate steps to ensure that the provisions of this Code and workers' legal rights and responsibilities are communicated to and understood by workers.

Suppliers should facilitate active worker engagement in issue identification and resolution. Suppliers should establish mechanisms to address grievances and track resolution of concerns. At a minimum, suppliers must not interfere with workers' efforts to identify workplace concerns.

ENVIRONMENT

Suppliers should protect the environment and the conservation of natural resources, including seeking out sustainable materials and manufacturing methods to conserve natural resources and reduce waste. This includes measuring, managing, and disclosing environmental impacts, including public reporting on annual environmental performance in areas such as greenhouse gas emissions, water use, and waste generation and management. Suppliers are encouraged to set targets and implement action plans for reducing environmental impacts.

ANIMAL WELFARE

Suppliers should comply with local standards on animal welfare. Where there is no local law, Suppliers are encouraged to follow the standards of the International Organization for Standardization for the environmental, behavioral, physical, and mental well-being of animals from which products, components, materials, or services are derived.

SUPPLY CHAIN MANAGEMENT

Suppliers should establish management systems to continually monitor and address workplace conditions, including the establishment and regular review of policies, practices, and personnel.

Suppliers should communicate, and provide all materials and support as necessary to communicate, Disney's expectations throughout their supply chains.

Suppliers should track and document their complete supply chain, including all components and raw materials, and must make such information available to Disney upon request.

Where required by Disney, Suppliers must authorize Disney and its designated agents (including third parties) to engage in monitoring activities to confirm compliance with this Code, including unannounced on-site inspections of facilities, other workplaces, and employer-provided housing; reviews of attendance, payroll, and other records relating to this Code; and private communications with workers, where permitted by applicable law.

Suppliers must maintain and make accessible all documentation that may be needed to demonstrate compliance with this Code and ensure that such documentation is accurate, current, and complete.

Unauthorized Subcontracting

Where required by Disney to disclose supply chain entities, suppliers may be required to obtain Disney's express written consent to engage such entities.

ETHICS AND RESPONSIBLE BUSINESS

Suppliers must adhere to all applicable anti-corruption laws and anti-bribery laws, rules, and regulations, and any other anti-corruption or anti-bribery obligations pertaining to the Supplier's performance under its agreements with Disney.

Suppliers must use Disney's intellectual property, including trademarks and copyrights, only as expressly authorized by Disney.

QUALITY AND SAFETY

Suppliers must create, manufacture, process, and deliver products and services that aim to meet the highest quality standards.

Suppliers should create, manufacture, process, and deliver products and services that are safe, suitable for the purpose intended, of the highest quality, and free of defects in design, construction, materials, and product execution. In addition, Suppliers should create, manufacture, process, and deliver products and services that comply with all product safety standards designated by Disney. Suppliers are responsible for securing their supply chain, including transportation, conveyance, warehouse, broker, consolidator, or other elements, and ensuring pertinent security and safety measures are in place and adhered to throughout their supply chain.