

# TheRealReal

## **Supplier Code of Conduct**

The RealReal (“TRR”) is committed to the highest standards of social and environmental responsibility and ethical conduct. TRR’s suppliers are required to provide safe working conditions, treat workers with dignity and respect, act fairly and ethically, and use environmentally responsible practices wherever they make products or perform services for TRR or its customers. TRR requires its suppliers to operate in accordance with the principles and requirements, as applicable, in this TRR Supplier Code of Conduct (“Code”) and in full compliance with all applicable laws and regulations. This Code goes beyond compliance with applicable laws by drawing upon internationally recognized standards to advance social and environmental responsibility. When differences arise between standards and legal requirements, the stricter standard shall apply, in compliance with applicable law. This Code outlines TRR’s expectations for Supplier conduct regarding labor and human rights, health and safety, environmental protection, ethics, and management practices.

TRR will assess its suppliers’ compliance with this Code, and any violations of this Code may jeopardize a supplier’s business relationship with TRR, up to and including termination. This Code applies to TRR suppliers and their subsidiaries, affiliates, and subcontractors and next-tier suppliers (each a “Supplier”) providing goods or services to TRR, or for use in or with TRR products or products TRR offers to its customers. Suppliers must cooperate with reasonable inquiries or audits as part of ongoing compliance monitoring in support of the standards in this Code of Conduct.

Additionally, TRR maintains detailed standards (“Standards”) that explicitly define our expectations for compliance with this Code by Suppliers. These standards are grouped into categories: labor, environment, safety, and community.

### **Labor:**

TRR believes all workers in our supply chain deserve a fair and ethical workplace. Workers must be treated with dignity and respect, and TRR suppliers shall uphold the highest standards of human rights.

Supplier shall not discriminate against any worker based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by applicable national or local law, in hiring and other employment practices.

Supplier shall commit to a workplace free of harassment and abuse. Supplier shall not threaten workers with, or subject them to, harsh or inhumane treatment, verbal or psychological abuse or harassment, coercion, or sexual harassment.

### **Prevention of Involuntary Labor and Human Trafficking**

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Supplier shall not traffic persons or use any form of slave, forced, bonded, indentured, or prison labor. Involuntary labor includes the transportation, harboring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

Supplier shall not withhold workers' original government-issued identification and travel documents. Supplier shall ensure that workers' contracts clearly convey the conditions of employment in a language understood by the workers. Supplier shall not impose unreasonable restrictions on movement within the workplace or upon entering or exiting company-provided facilities.

Workers shall not be required to pay employers' or their agents' recruitment fees or other similar fees to obtain their employment. If such fees are found to have been paid by workers, such fees shall be repaid to the worker.

## Prevention of Underage Labor

Supplier may provide legitimate workplace apprenticeship programs for educational benefit that are consistent with Article 6 of ILO Minimum Age Convention No. 138 or light work consistent with Article 7 of ILO Minimum Age Convention No. 138, but under no circumstances may Supplier hire workers who are younger 15 years of age, below the applicable minimum legal age for employment, or who have not reached the applicable age for completion of compulsory education- the highest standard will always apply.

## Training and Communication

Supplier shall develop and maintain management and worker training programs to facilitate proper implementation of its policies and procedures and to fulfill Supplier's continuous improvement objectives.

Supplier shall have a process for communicating clear and accurate information about its performance, practices, policies, and expectations to its workers, next-tier supplier(s), and customers.

Supplier shall have an ongoing process to obtain feedback on its practices related to this Code and to foster continuous improvement.

## Working Hours & Wages

Regular workweeks shall not exceed 40 hours. Supplier shall follow all applicable laws and regulations with respect to working hours and days of rest, and all overtime must be voluntary.

Supplier shall pay at least the minimum wage and provide benefits as required by law and/or contract. Supplier shall compensate workers for their overtime hours at the legal premium rate.

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Supplier shall communicate pay structure and pay periods to all workers clearly, in writing, at the beginning of employment and at least seven (7) days prior to changes being implemented.

Supplier shall meet all legal requirements relating to wages and benefits, pay accurate wages in a timely manner, and wage deductions shall not be used as a disciplinary measure. All use of temporary and outsourced labor shall be within the limits of the local law.

## Freedom of Association and Collective Bargaining

Supplier shall respect workers' rights and support the International Labor Organization's fundamental conventions. Supplier shall uphold labor rights including the freedom of association and recognize the right to collective bargaining in all places where they conduct business.

## Grievance Systems

Supplier shall ensure that workers can report grievances and receive timely responses to foster an open dialogue.

## **Environment:**

TRR is committed to protecting the environment, and environmental responsibility is at the core of everything we do. Supplier shall develop, implement, and maintain environmentally responsible business practices.

## Environmental Permits and Reporting

Supplier shall obtain, keep current, and comply with all required environmental permits. Supplier shall comply with the reporting requirements of applicable permits and regulations, including, but not limited to, those related to hazardous waste, air emissions, waste-water emissions, and runoff.

Supplier shall regularly quantify, set targets, monitor progress, and reduce its emissions of greenhouse gasses through conservation, use of clean energy, or other measures.

Supplier shall regularly quantify, set targets, monitor progress, and reduce its per capita production of waste while increasing its use of recycled materials, participation in recycling programs, and reduction of water usage.

## **Safety:**

Worker health, safety, and well-being is important to TRR. Supplier shall provide and maintain a safe work environment and integrate sound health and safety management practices into its business. Workers shall have the right to report unhealthy working conditions and expect a response.

## Health and Safety Permits

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Supplier shall obtain, keep current, and comply with all required health and safety permits.

## Occupational Health and Safety Management

Supplier shall identify, evaluate, and manage occupational health and safety hazards through a prioritized process of hazard elimination, substitution, engineering controls, administrative controls, and/or personal protective equipment.

## Incident Management

Supplier shall have a system for workers to report health and safety incidents and near-misses, as well as a system to investigate, track, and manage such reports. Supplier shall implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate workers' return to work.

## Health and Safety Communication

Supplier shall provide workers with appropriate workplace health and safety training in their primary language. Health and safety related information shall be clearly posted in the facility. Supplier shall identify and assess potential emergency situations. For each situation, Supplier shall develop and implement emergency plans and response procedures that will minimize harm to life, environment, and property.

## **Community:**

TRR expects the highest standards of ethical conduct in all of our endeavors. Supplier shall always be ethical in every aspect of its business, including relationships, practices, sourcing, and operations. This will benefit the Supplier, its employees, the third parties with which it interacts, and the communities in which it operates.

## Responsible Sourcing of Materials

Suppliers shall exercise due diligence on relevant materials in their supply chains. Suppliers shall develop particular due diligence policies and management systems in order to identify applicable risks and take appropriate steps to mitigate them. Due diligence shall be conducted to the material processing level in order to determine whether relevant materials originate from regions with high risks, which include areas associated with conflict, worst forms of child labor, forced labor and human trafficking, gross human rights violations such as widespread sexual violence, or other reasonably objective high risk activities, including severe health and safety risks and negative environmental impacts.

## Business Integrity

Supplier shall not engage in corruption, extortion, embezzlement, or bribery to obtain an unfair or improper advantage. Supplier shall abide by all applicable anti-corruption laws and

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regulations of the countries in which it operates, including the Foreign Corrupt Practices Act (FCPA) and applicable international anti-corruption conventions.

Suppliers shall have a policy relating to business with TRR that sets limits and defines appropriateness of the giving and acceptance of gifts. Gifts include items such as cash, or cash equivalents is never permitted. Suppliers shall have a process to investigate and report any violations to the policy.

## Disclosure of Information

Supplier shall accurately record information regarding its business activities, labor, health and safety, and environmental practices and shall disclose such information, without falsification or misrepresentation, to all appropriate parties and as required by law.

## Privacy, Data, and IP Protection

TRR values artistry and craft in all media. Supplier shall respect intellectual property rights and safeguard customer information. Supplier shall manage technology and know-how in a manner that protects intellectual property rights. Any customer data provided to Supplier shall be used only to perform contracted services and nothing else.

## Whistleblower Protection and Anonymous Complaints

Supplier shall provide an anonymous complaint mechanism for managers and workers to report workplace grievances. Supplier shall protect whistleblower confidentiality and prohibit retaliation.

## C-TPAT

To the extent that Supplier transports goods for TRR into the United States, Supplier shall comply with the C-TPAT (Customs-Trade Partnership Against Terrorism) security procedures on the U.S. Customs website at [www.cbp.gov](http://www.cbp.gov) (or other website established for such purpose by the U.S. government).

## Supplier Policies

Supplier shall develop its own ethics and compliance policy affirming its commitment to high standards of social and environmental responsibility, ethical conduct, and continuous improvement. Supplier shall post this policy in the primary local language at all of its facilities or on an accessible company intranet or website.

## Management Accountability and Responsibility

Supplier shall identify company representatives responsible for ensuring implementation and periodic review of its management systems.

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## Risk Assessment and Management

Supplier shall develop and maintain a process to identify labor and human rights, health and safety, environmental, business ethics, and legal compliance risks associated with its operations; determine the relative significance of each risk; and implement appropriate procedures and controls to minimize the identified risks. Suppliers shall maintain appropriate documents and records to document these activities and ensure regulatory compliance.

## Performance Objectives with Implementation Plans and Measures

Supplier shall have written standards, performance objectives, targets, and implementation plans, including periodic assessments of the performance against those objectives.

## Audits and Assessments

Supplier will permit TRR and a third party designated by TRR to periodically evaluate Supplier's facilities and operations and assess Supplier's compliance with the applicable principles and requirements of the Code, and those of its subcontractors and next-tier suppliers, to the extent they are providing goods or services to TRR, for TRR's benefit, or for use in TRR products.

## Information Requests

Supplier will timely respond to Supplier Information Requests ("SIRs") issued by TRR in response to concerns or publications regarding covered topics.