



Global Supplier Code of Conduct

THIS BUSINESS REFERENCE GUIDE IS CURRENT
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Amway



Introduction

Amway, which encompasses Alticor Inc., its direct and indirect parents, subsidiaries, and numerous affiliates, is a global, entrepreneur-led, health and wellbeing company based in Ada, Michigan, United States.

We are committed to our vision of **helping people live better lives** across more than 100 countries and territories where we do business. We do that through the relationships we have with Amway Independent Business Owners (ABOs), customers and our employees, but also with our suppliers and partners.

Amway Values guide our work, building trust and ensuring ethical business practices.

- **Partnership** – We trust and respect each other, and we recognize the complementary skills necessary to achieve shared success.
- **Personal Worth** – We treat everyone with dignity and respect and believe all people deserve an opportunity to achieve their full potential.
- **Responsibility** – We are accountable for the actions we take and the results we achieve for ourselves, each other, and the communities we serve.

- **Integrity** – We are honest, courageous, and consistent in our words and actions.

Those Values can be seen in our commitment to responsible sourcing, environmental sustainability, social impacts, and the safety and wellbeing of workers across our global supply chain. This Global Supplier Code of Conduct (*Supplier Code of Conduct* or *Code*) establishes the minimum standards (*Standards*) we expect from our suppliers in the following areas:

- Integrity and business ethics
- Human rights and labor
- Workplace health and safety
- Protection of our environment
- Responsibly-sourced materials

This Code is the foundation for the relationship that Amway has with all suppliers (*Supplier(s)*) that provide goods or services to Amway. It is based on trust, transparency and mutual respect. We expect our Suppliers to be responsible for compliance with these Standards throughout their operations and supply chain, including their employees, suppliers, subsidiaries, affiliates, agents, contractors, subcontractors, and their facilities.

INTEGRITY AND BUSINESS ETHICS

Amway is committed to the highest ethical business standards and complying with laws and regulations in the countries where we do business. We aim to meet or exceed the requirements of applicable environmental, health and safety laws and regulations; corporate standards; and other standards we subscribe to. We expect our Suppliers to do the same. If any provision of this Code conflicts with applicable law, Suppliers are expected to comply with the law while striving to meet the underlying tenets of the Code. If this Code requires a Supplier to meet a higher standard than set out by law or regulation, the Supplier will meet the higher standard.

ANTI-BRIBERY AND ANTI-CORRUPTION

We have a zero-tolerance approach to all forms of bribery and corruption. Suppliers will comply with any applicable anti-bribery and anti-corruption laws. Suppliers also will refrain from offering or making any improper payments or gifts of anything of value to Amway employees, customers, government officials, political parties, candidates for public office or others. This includes a prohibition on facilitating payments intended to expedite or secure performance of routine governmental actions such as visa or customs clearance, even if they do not violate local law.

ANTITRUST AND FAIR COMPETITION

Suppliers must comply with all applicable antitrust and fair competition laws. They may not participate in any type of agreement with competitors to fix prices, allocate markets, limit capacity, or undermine the integrity of any competitive bidding process.

CONFLICT OF INTEREST

Suppliers will maintain the highest ethical standards, which includes actively seeking to avoid conflicts of interests and disclosing any conflicts if they exist or arise while doing business with Amway.

This includes a conflict between the interests of Amway and a Supplier's personal interests or those of a Supplier's close relatives, friends, or associates, or when a Supplier has ownership interests in a business that may compete with Amway.

PRIVACY, DATA PROTECTION, AND INFORMATION SECURITY

Amway considers privacy to be a fundamental human right. Suppliers will comply with all data privacy and data protection laws applicable to Amway and Suppliers when collecting, storing, using, and processing personal information obtained from Amway, on behalf of Amway, or about Amway employees, consumers, customers, visitors, Suppliers, ABOs/IBOs, and other business partners.

Suppliers will uphold high standards of information security and implement technical and organizational measures to ensure the protection of all data entrusted to them by Amway. These obligations apply regardless of the medium in which the data is held (electronic, physical, or oral) and across all stages of processing, storage, and transmission.

PROTECTION OF INTELLECTUAL PROPERTY

Suppliers will respect and comply with all laws governing Intellectual Property (IP) rights, protect against IP disclosure and misuse, and comply with Amway's requirements governing their use. Supplier will manage technology and know-how in a manner that protects IP rights of Amway and all parties, such as by only using information technology and software that has been legitimately acquired and licensed.

ARTIFICIAL INTELLIGENCE USAGE & GOVERNANCE

Amway is committed to ethical, secure, privacyconscious, and lawful use of Artificial Intelligence (AI) technologies throughout its operations and extended supply chain. While AI presents substantial opportunities to enhance efficiency, innovation, and decision-making, it also introduces complex challenges related to data protection, transparency, accountability, and algorithmic fairness that require diligent oversight. Accordingly, Suppliers that deploy AI systems on behalf of Amway or incorporate AI technologies into products, services, and/or platforms used by or associated with Amway should comply with applicable AI laws and regulatory requirements. AI systems should be developed and deployed with appropriate human oversight, transparency, and fairness. Responsible AI use is considered part of the Supplier's broader duty to protect data, uphold human rights, and operate with integrity.



Human Rights and Labor

All Suppliers' workers deserve a fair and ethical workplace. Suppliers will treat their workers with the utmost dignity and respect and uphold the highest standards of human rights.

COMPLIANCE WITH LABOR LAWS

Suppliers must follow all applicable laws, regulations, and contractual obligations when it comes to labor relations for all their personnel, whether they are employees, interns, contract workers, etc. Suppliers will provide employment benefits (e.g., medical, social security, and unemployment) to their employees as required by law, regulation, or contract, and ensure their workers' legal employment status. Suppliers' workers will comply with Amway's safety standards and requirements when working for Amway on Amway's premises.

NO DISCRIMINATION, ABUSE, OR HARASSMENT

Suppliers will not discriminate in hiring, compensation, advancement, promotion, termination, or any other employment practice based on race, national origin, gender, religion, age, or any other characteristic protected by applicable law. Suppliers will treat workers with respect and dignity and will not subject them to corporal punishment or physical, verbal, sexual, or psychological abuse or harassment or any threat of these.

CHILD LABOR

Suppliers will not use child labor. The term "child" refers to any person under the age of sixteen, under the age for completing compulsory education, or under the minimum age for employment in the applicable country/area, whichever is greatest. Suppliers will comply with all applicable child labor laws and regulations where goods for Amway are produced or where services are provided for, on behalf of, or at the request of Amway.

FORCED LABOR

All labor must be voluntary. Suppliers will not support or engage in slavery or human trafficking in any part of their supply chains, including compelled, involuntary, or forced labor; bonded labor; indentured labor; or prison labor.

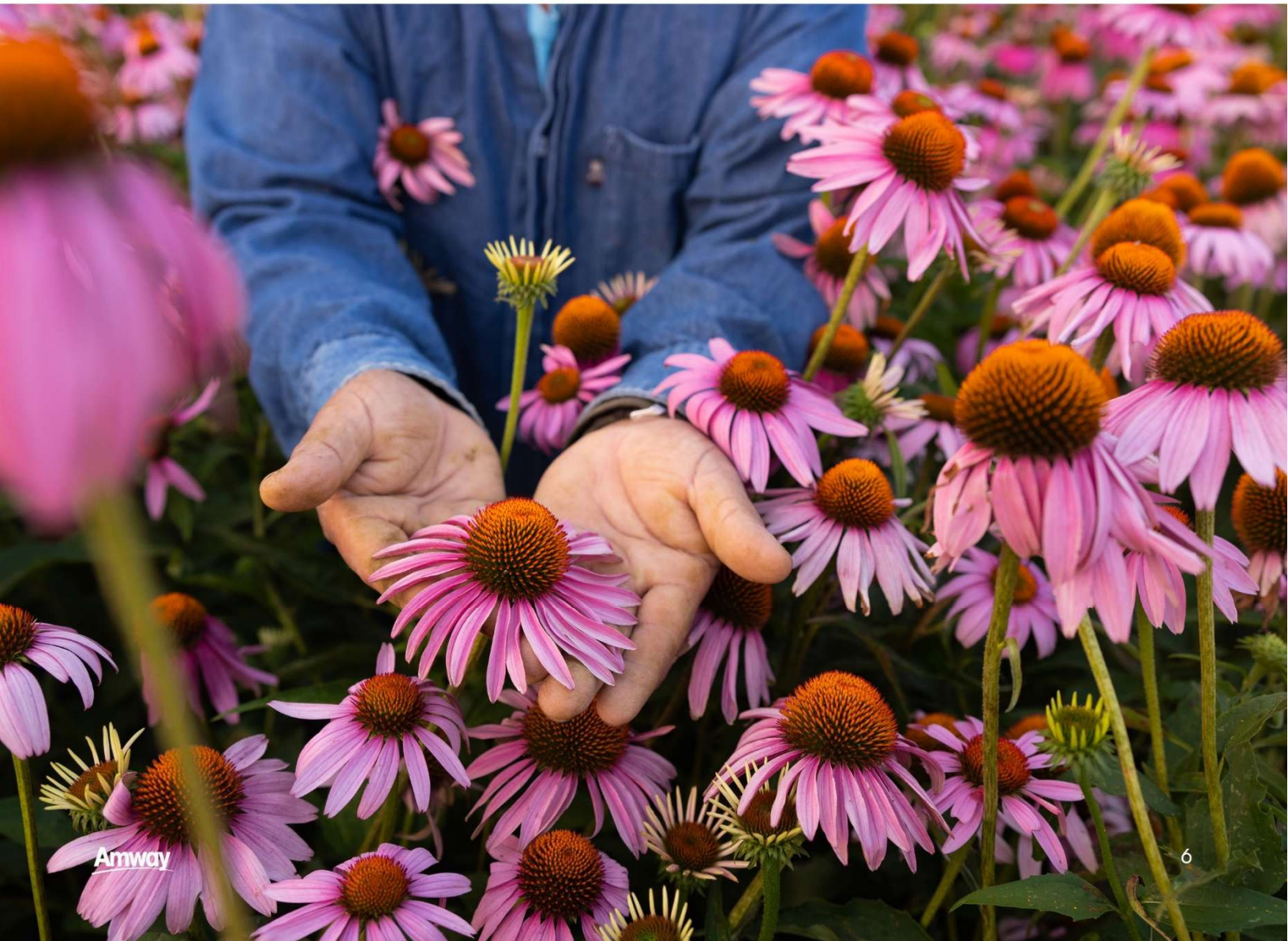
WORKING HOURS AND FAIR WAGES

Suppliers will meet any applicable prevailing wage and hour requirements and follow all local laws and regulations regarding wage, benefits, working hours, rest periods, bathroom breaks, meal breaks and overtime pay. Suppliers will not require or allow workers to work more than the maximum legally permitted number of hours per day or week or more hours than workers can safely perform.

Workers must be paid at a rate at least equal to the legal minimum wage, including piece rate workers. Suppliers must offer vacation time, leave periods, and time off for legally recognized holidays. They must communicate pay structure and pay periods to all workers and pay accurate wages in a timely manner.

FREEDOM OF ASSOCIATION AND GRIEVANCE MECHANISMS

Suppliers will comply with all laws regarding the rights of employees to associate or not associate with any legally constituted group, without fear of reprisal, intimidation, or harassment, in accordance with international labor standards. Suppliers will have a system in place to enable fair, confidential, and anonymous grievance reporting, investigation, and follow-up without fear of reprisal. That system will be transparent, understandable, and accessible to all employees. And Suppliers will provide whistleblower protections for workers where required by law.



Workplace Health and Safety

In addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production, work retention, and morale. Amway's Suppliers should recognize that workforce input and education is essential to identifying and solving health and safety issues in the workplace.

OCCUPATIONAL HEALTH, SAFETY, AND HAZARD PREVENTION

Suppliers will ensure that their employees' workplaces are in compliance with all applicable local and national health and safety laws and regulations. They will maintain workplaces free from hazards including ensuring proper management of chemical materials, engineering and operating equipment using guarding and energy isolation procedures, and providing job-related, appropriately maintained personal protective equipment with proper use instructions. Suppliers should identify, evaluate, and manage occupational health and safety hazards through reliable management systems, including hazard assessments, training, inspections, and procedures for safe operation and emergency response.

SANITATION, FOOD, AND HOUSING

Suppliers will provide their workers with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage, and eating facilities. If a Supplier provides living accommodations, they will be habitable and meet all applicable standards for residential use.

EMERGENCY PREVENTION, PREPAREDNESS, AND RESPONSE

Suppliers should identify and assess potential emergency situations. For each situation, Suppliers will develop and implement emergency plans and response procedures that minimize harm to life, environment, and property.

ACCURATE REPORTING AND RIGHT TO AUDIT

Suppliers will provide requested data accurately and promptly, as this is critical to Amway's operations, customer service, legal compliance, financial results, and accurate reporting. Suppliers will maintain all records related to their business with Amway, which will be made available to Amway upon request. To ensure compliance with the Standards set forth in the Code, Suppliers agree to make their facilities available at reasonable times for inspection by Amway, its affiliates, representatives, or independent inspection firms retained by Amway.

INCIDENT MANAGEMENT

Suppliers will 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. Suppliers will also implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate workers' return to work.

Protection of Our Environment

Amway's Suppliers should take their environmental responsibilities seriously. In manufacturing operations, Suppliers should minimize adverse effects on the community, environment, and natural resources while safeguarding the health and safety of the public.

ENVIRONMENTAL PERMITS AND REPORTING

Suppliers will comply with all applicable local and national environmental laws and regulations. They will obtain, maintain, and renew all required environmental permits (e.g., discharge monitoring), approvals, and registrations; follow all applicable operational and reporting requirements; and will report their environmental emissions data to Amway, if requested.

POLLUTION PREVENTION AND RESOURCE REDUCTION

Suppliers should reduce or eliminate the use of resources, including water and energy, and reduce or eliminate the generation of all types of waste. Strategies include conservation and recycling, re-using materials, substituting different materials and modifying production, maintenance, and facility processes.

HAZARDOUS SUBSTANCES

Suppliers will identify and manage chemicals and other potentially hazardous materials to ensure their safe transportation, handling, storage, use, recycling, reuse, and disposal.

WASTEWATER AND SOLID WASTE

Suppliers should implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle non-hazardous solid waste. Measures should be implemented to reduce generation of wastewater. Any wastewater that is generated from operations,

industrial processes, and sanitation facilities should be characterized (based on specific composition and characteristics), monitored, controlled, and treated as required by applicable laws or regulations prior to discharge or disposal. Suppliers should also conduct routine monitoring of the performance of their waste-water treatment systems.

AIR EMISSIONS

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals, and combustion by-products generated from operations should be characterized (which involves identifying, quantifying, and understanding the properties of these emissions), routinely monitored, controlled, and treated as required by applicable laws or regulations prior to discharge. Suppliers will conduct routine monitoring of the performance of their air emission control systems.

MATERIALS RESTRICTIONS

Suppliers must adhere to all applicable laws and regulations regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

RESPECT FOR LAND RIGHTS

Suppliers will respect real property ownership rights, IP rights, and all other rights of third parties and strive to improve the communities in which they operate.

Responsibly-sourced Materials

Suppliers are required to fully support and cooperate with Amway's efforts to secure full transparency and traceability of raw materials, including by providing detailed and accurate supply chain information.

RAW MATERIAL DUE DILIGENCE

Amway partners with Suppliers that provide worldclass, quality raw materials and products. To meet this goal, Amway has a robust Supplier Quality Management Program with a cross-functional team that reviews and approves a Supplier before materials are used in Amway's products. Suppliers will comply with all applicable laws and regulations regarding the application of the Convention on Biological Diversity. Suppliers will meet Amway's quality requirements and specifications and should actively and continuously drive quality improvements that will support the prevention of non-conforming material. Suppliers' raw materials should be responsibly and sustainably sourced in a manner and location that minimizes environmental risk. Suppliers agree to provide all requested documentation to demonstrate that the origin of raw materials does not pose any risk to the environment, Indigenous peoples, and/or local communities.

MATERIALS, SERVICES, AND LABELING

Amway creates specifications for all products, raw materials, and components (such as labels) that outline the appropriate quality and safety testing parameters. A cross-functional team reviews and approves the specifications to ensure the correct parameters are listed. Suppliers will test materials to verify compliance with these specifications and provide a Certificate of Analysis or Certificate of Conformance (upon request) to confirm the materials meet Amway's requirements. Amway tests and approves all products, raw materials, and components before release to consumers.

FOOD SAFETY AND QUALITY

As a global company, Amway adheres to the rules and regulations for each market in which it does business. Its Suppliers will adhere to all rules and regulations applicable to their businesses. Amway expects its Suppliers to know and meet the quality and regulatory standards required by applicable laws. Suppliers that provide food ingredients or food contact substances will meet all applicable food safety standards.

ANIMAL TESTING & WELFARE

Amway does not conduct animal testing on raw materials, components, or finished products. We ensure ingredients and materials sourced outside Amway align with our standards and have not been tested on animals. However, there may be circumstances in which a governmental or regulatory authority requires animal testing on a finished product. In such cases, alternative methods to animal testing should be exercised whenever possible and submitted to the appropriate authorities to challenge testing requirements and encourage reconsideration. Only when mandated will animal testing be conducted by government approved third-party laboratories, not Amway. Suppliers acknowledge Amway's position opposing animal testing and should commit to the same rigorous avoidance of animal testing.

Conclusion

Suppliers demonstrate their commitment to the concepts outlined in this Code by providing adequate resources to ensure compliance with these Standards. Suppliers are expected to have mechanisms in place to identify, assess, and manage the risks addressed in Amway's Supplier Code of Conduct. Upon Amway's request, Suppliers agree to self-certify that they meet these Standards and will to provide reports and other information necessary to prove compliance or to ensure Amway can satisfy its legal obligations.

HOW TO REPORT CONFLICTS OF INTERESTS OR CODE VIOLATIONS

Suppliers can disclose potential and/or actual conflicts using the following methods:

- (1) Amway's Global Compliance Reporting Program at <https://amway.ethicspoint.com>;
- (2) Written correspondence addressed to Alticor Inc., Attn: Chief Compliance Officer, Mail Code 78-2M, 7575 Fulton Street East, Ada, Michigan, United States of America 49355;
- (3) Email to ChiefComplianceOfficer@amway.com;
- or (4) Direct communication with an Amway employee with the title of manager or above

Suppliers may self-report potential or actual violations of the Supplier Code of Conduct using those same methods or report anonymously by using Amway's Global Compliance Reporting Program at <https://amway.ethicspoint.com>.

RIGHT TO AUDIT AND CODE VIOLATIONS

Each Supplier that chooses to conduct business with Amway acknowledges that these Standards include a right to audit that Amway may exercise to determine whether a Supplier is meeting the Standards set forth in the Code. Suppliers acknowledge that Amway may, in its sole discretion, conduct inspections of their facilities and/or audit their records to confirm their compliance with the Code. Amway has no obligation to conduct such inspections. A violation of Amway's Supplier Code of Conduct may be considered a material breach of an agreement between Amway and the Supplier, depending on the terms therein.

NO RETALIATION POLICY

Suppliers shall not retaliate or take disciplinary action against anyone who has, in good faith, reported violations of law or questionable behavior; raised questions or concerns about a potential violation of law, the Code or Amway policies; assisted with an investigation of a reported violation; or sought advice regarding this Supplier Code of Conduct.

Amway