

TRUPANION, INC.
VENDOR CODE OF CONDUCT
As amended on May 12, 2023

INTRODUCTION

Trupanion, Inc., a Delaware corporation (collectively with its subsidiaries, the “**Company**”) has adopted this Vendor Code of Conduct (this “**Code**”) to set high standards of ethical business conduct and responsible sourcing for its vendors and other suppliers (each a “**Supplier**” and collectively “**Suppliers**”). This Code applies to all Suppliers that provide goods or services to the Company. Each Supplier is responsible for compliance with the standards set out in this Code.

A. Slavery and Human Trafficking

All labor must be voluntary. Supplier shall not support or engage in slavery or human trafficking in any part of its supply chain.

Without limiting Supplier’s obligations hereunder, Supplier shall not, and shall ensure that its suppliers, vendors, agents, and subcontractors (each, a “**Partner**”) do not, support or engage in, or require any:

- compelled, involuntary, or forced labor;
- labor to be performed by children;
- bonded labor;
- indentured labor; or
- prison labor.

B. Compliance and Documentation

Supplier shall:

- implement and maintain a reliable system to verify the eligibility of all workers, including:
 - age eligibility; and
 - legal status of foreign workers.
- implement and maintain a reliable recordkeeping system regarding the eligibility of all workers.

C. Identification Papers

Without limiting Supplier’s obligations hereunder, Supplier shall not require any worker to surrender control over original:

- identification papers or documents giving a foreign worker the right to work in

- the country;
- identification papers or documents, such as a passport, giving a foreign worker the right to enter or leave the country; or
- documents, such as a birth certificate, evidencing the worker's age.

D. Financial Obligations

Without limiting Supplier's obligations hereunder, Supplier shall not, whether or not as a condition to the right to work, require any worker (or worker's spouse or family member) to, directly or indirectly:

- pay recruitment or other fees or other amounts (monetary or in-kind);
- incur debt;
- make financial guarantees; or
- incur any other financial obligation.

E. Freedom of Movement

Without limiting Supplier's obligations hereunder, Supplier shall ensure that workers have the right to freedom of movement without:

- delay or hindrance; or
- the threat or imposition of any discipline, penalty, retaliation, or fine or other monetary obligation.

Worker freedom of movement rights include each worker's right to leave the facilities without retaliation:

- at the end of each workday;
- based on reasonable health and safety-related justifications; and
- based on any reasonable circumstances, such as personal or family emergencies.

F. Freedom to Terminate Employment

Without limiting Supplier's obligations hereunder, Supplier shall allow workers to terminate their employment or work arrangement:

- without restriction; and
- without the threat or imposition of any discipline, penalty, retaliation, or fine or other monetary obligation.

G. Compensation and Benefits

Supplier must compensate all workers with wages, including overtime premiums, and benefits that at a minimum meet the higher of:

- the minimum wage and benefits established by applicable law; and
- collective agreements.

Supplier shall make wage payments regularly and provide benefits on a timely basis. Supplier's obligation to compensate and provide benefits applies to all workers at all times, including during periods of training, apprenticeship, and probation.

H. Documentation

Supplier shall:

- provide proof of payment to workers in the workers' native language showing hours worked, wage amounts and rates (regular, overtime, and bonus), and deductions;
- ensure that proof of payment is accurate, is clearly calculated, and enables workers to quickly verify the amount of payment and method of calculation; and
- maintain proper documentation of wage payments for their internal records.

I. Deductions

Supplier shall not make any deductions from wages, except income tax withholding and those that are legally allowed.

J. Work Hours

Supplier shall not require or allow workers to work more than the maximum legally permitted number of regularly paid hours worked per week. Additional overtime hours are voluntary, and must not exceed the maximum legally permitted number of overtime hours worked per week.

Supplier shall allow workers to take:

- reasonable rest breaks, including bathroom breaks; and
- reasonable lunch breaks.

K. No Discrimination, Abuse, or Harassment

Supplier shall not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement, or any other employment practice based on race, color, national origin, gender, gender identity, sexual orientation, military status, religion, age, marital or pregnancy status, disability, or any other characteristic other than the worker's ability to perform the job.

Supplier shall treat workers with respect and dignity.

Supplier shall not subject workers to corporal punishment, or physical, verbal, sexual, or psychological abuse or harassment. Supplier must not condone or tolerate such behavior by its Partners.

L. Health and Safety

Supplier shall provide a safe, healthy, and sanitary working environment. Supplier shall implement procedures and safeguards to prevent workplace hazards, and work-related accidents and injuries, including procedures and safeguards to prevent industry-specific workplace hazards, and work-related accidents and injuries that are not specifically addressed in this Code.

General and industry-specific procedures and safeguards include those relating to:

- health and safety inspections;
- equipment maintenance;
- maintenance of facilities;
- worker training covering the hazards typically encountered in their scope of work;
- fire prevention; and
- documentation and recordkeeping.

Supplier shall provide workers adequate and appropriate personal protective equipment to protect workers against hazards typically encountered in the scope of work.

M. Facilities

Supplier shall:

- ensure that all facilities meet all applicable building codes and industry design and construction standards;
- obtain and maintain all construction approvals required by law; and
- obtain and maintain all zoning and use permits required by law.

N. Environmental Protection

Supplier shall operate its facilities in compliance with all applicable environmental laws relating to:

- waste disposal;
- emissions;
- discharges; and
- hazardous and toxic material handling.

O. Inputs and Components

Supplier must ensure that the goods that it manufactures (including the inputs and components that it incorporates into its goods) comply with all applicable environmental laws. Supplier must ensure that it will only use packaging materials that comply with all applicable environmental laws.

P. Gifts and Entertainment

Supplier should maintain the highest ethical standards. Supplier must not offer cash to any Trupanion team member. Reasonable gifts, meals or entertainment are acceptable, provided all of the following are met:

- it is consistent with accepted business practice;
- it could not reasonably be perceived as a bribe or make the recipient feel obligated to Supplier; and
- public disclosure of the gift or entertainment would not embarrass the Company or Supplier.

Q. Report Violations

Supplier shall self-report any violations of this Code. Supplier can also submit questions and comments regarding the Code by submitting an online report or calling our ethics hotline through trupanion.ethicspoint.com or trupanionmobile.ethicspoint.com.

Supplier shall not retaliate or take disciplinary action against any worker who has, in good faith, reported violations or questionable behavior, or who has sought advice regarding this Code.

R. Compliance with Laws

Supplier and its Partners shall fully comply with all applicable national and/or local laws and regulations. In addition, Supplier shall follow Trupanion's own code of conduct and policies where they exceed applicable legal requirements. These laws and policies include but are not limited to those related to labor, immigration, health and safety, and the environment.