



Supplier Code of Conduct

1.0 Purpose

Command Alkon Incorporated and its related entities (“Command Alkon”) is committed to conducting its business in an ethical, legal, and socially responsible manner. Command Alkon engages with its suppliers to share this commitment and, therefore, has established this Supplier Code of Conduct (“Code”). Although there may be different legal and cultural environments applicable to its suppliers, Command Alkon suppliers must comply with the Code in order to do business with Command Alkon or any of its subsidiaries.

This Code is aligned with the United Nations (“UN”) Global Compact 10 Principles, Responsible Business Alliance (“RBA”) Code of Conduct, Joint Audit Cooperation (“JAC”) Supply Chain Sustainability Guidelines and other internationally recognized standards. This Code supports our commitment to the UN Sustainable Development Goals (“SDGs”) addressing the world’s most significant development challenges.

We encourage suppliers to maintain policies, procedures and practices to address these topics. We also encourage our suppliers to implement efficient management systems, utilizing the internationally recognized standards – i.e. ISO14001, ISO45001, SA8000, etc.

2.0 Scope

This Code applies to current and potential Command Alkon suppliers.

3.0 Policy

3.1 Compliance with Laws, Regulations and Published Standards. At a minimum, Command Alkon suppliers must operate in full compliance with the applicable laws, rules, regulations, codes and ethical standards of the countries, states and localities in which they operate or where they provide products, people or services to or for Command Alkon. This includes, but is not limited to, laws and regulations relating to environmental, occupational health and safety, ethics, and labor practices. In addition, Command Alkon suppliers must require their suppliers (including labor and service agencies/agents) to do the same.

3.2 Command Alkon Policies and Procedures. Suppliers must comply with Command Alkon’s published policies and procedures. Command Alkon may modify those policies and procedures, including this Code, from time to time. Suppliers should always consent to and comply with the latest version, which can be found at: **insert hyperlink to web page.**



- 3.3 **Labor Practices & Human Rights.** We expect our suppliers to respect and support the protection of human rights of their workers and others affected by their activities.
- 3.3.1 **Freely Chosen Employment, Forced Labor.** Supplier must not use any form of forced, bonded (including debt bonded), indentured or involuntary prison labor, slavery, or human trafficking. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting supplier provided facilities. Supplier's workers must be provided with a written employment agreement in their native language. Supplier and agents shall not hold workers' government-issued paperwork (e.g. ID, passport, work permit, etc.) unless holding is required by law. All work is voluntary and workers are free to leave work at any time or terminate their employment if reasonable notice is given as per their contract, and shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment.
- 3.3.2 **Child Labor.** Child labor is not to be used in any stage of the supplier's service to Command Alkon. The minimum age for employment or work is the higher of 15 years of age, the minimum age for employment in the relevant country, or the age for completing the compulsory education in the relevant country. The use of legitimate workplace learning programs, which comply with applicable laws and regulations, is supported. Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.
- 3.3.3 **Working Hours.** Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.
- 3.3.4 **Wages and Benefits.** Supplier shall comply with applicable laws relating to wages and benefits (including minimum wages, overtime pay/rate, equal remuneration and legally mandated benefits). Supplier must not use deductions from wages as a disciplinary measure and must pay workers in a timely manner including a provision of clear and understandable wage statement for each pay period.
- 3.3.5 **Humane Treatment.** Supplier shall treat all workers with respect and dignity and ensure that they are protected from harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal



punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

3.3.6 Non-discrimination/Non-Harassment. Suppliers shall not engage in or support harassment or discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices. Workers will be provided with reasonable accommodation for disability and religious practices. In addition, workers or potential workers will not be subjected to medical tests or exams that could be used in a discriminatory way. Suppliers shall promote equal opportunities.

3.3.7 Freedom of Association. Suppliers shall respect the right of their workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

3.4 Health & Safety Practices. Suppliers shall provide a safe and healthy workplace and care for their workers and anyone that could be impacted by their activities. We expect our suppliers to implement the health & safety management system aligned with recognized international standards such as ISO45001, and a third-party certification is encouraged.

3.4.1 Occupational Safety. Suppliers shall identify and assess workplace hazards (e.g., chemical, electrical, and other energy sources, fire, vehicles, and fall hazards) and control these through proper design, engineering and administrative controls, preventative maintenance and safe work procedures and training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment. Reasonable steps should be taken to protect pregnant women/nursing mothers.

3.4.2 Emergency Preparedness. Supplier shall identify, assess and be prepared for emergency situations by implementing emergency plans and response procedures including emergency reporting, employee notification and



evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

- 3.4.3 **Occupational Injury and Illness.** Supplier shall ensure that procedures and systems are in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.
- 3.4.4 **Industrial Hygiene.** Supplier workers exposure to chemical, biological and physical agents shall be identified, evaluated, and controlled according to the Hierarchy of Controls. When hazards cannot be adequately eliminated or controlled, workers shall be provided with and use appropriate personal protective equipment.
- 3.4.5 **Physically Demanding Work.** Supplier workers exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.
- 3.4.6 **Machine Safeguarding.** Supplier shall ensure that production and other machinery are evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.
- 3.4.7 **Sanitation, Food, and Housing.** Supplier shall provide workers with access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the supplier or a labor agent must be clean and safe, and provided with appropriate emergency egress, hot water, adequate lighting, heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.
- 3.4.8 **Health and Safety Communication.** Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety



related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training shall be provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.

- 3.5 **Environmental Practices.** Suppliers shall minimize the adverse environmental impacts of their operations, products and services. We expect our suppliers to implement the environmental management system aligned with recognized international standards such as ISO14001 or the Eco Management and Audit System (“EMAS”), and a third-party certification is encouraged.
- 3.5.1 **Environmental Permits and Reporting.** All required environmental permits (e.g., discharge monitoring), approvals and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements shall be followed.
- 3.5.2 **Pollution Prevention and Resource Reduction.** Supplier shall optimize its consumption of natural resources, including water, fossil fuels, minerals, and virgin forest products by conserving these or by practice such as modifying production, maintenance and facility processes, materials substitution, re- use, conservation, recycling, or other means. Measures should be implemented to prevent pollution and minimize generation of waste and emissions at the source or by practices such as: adding pollution control equipment; modifying production, maintenance and facility processes; or by other means.
- 3.5.3 **Hazardous Substances.** Chemicals, waste and other materials posing a hazard to humans or the environment are to be identified, labeled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.
- 3.5.4 **Solid Waste.** Supplier shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).
- 3.5.5 **Air Emissions.** Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge. Supplier shall conduct routine monitoring of the performance of its air emission control systems.



- 3.5.6 **Materials Restrictions and Product Content.** Suppliers shall adhere to applicable laws, regulations and Command Alkon requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.
- 3.5.7 **Water Management.** Supplier shall implement a water management program that: documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater shall be characterized, monitored, controlled, and treated as required prior to discharge or disposal.
- 3.5.8 **Energy Consumption, Climate Change and Greenhouse Gas Emissions.** Suppliers must identify, monitor, and minimize relevant greenhouse gas ("GHG") emissions and energy consumption from their operations. Supplier shall look for cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.
- 3.6 **Ethical Practices.** Suppliers shall conduct their business in accordance with the highest standard of ethical behavior and in accordance with applicable laws and regulations. Suppliers are expected to conform to the requirements in the following areas:
 - 3.6.1 **Business Integrity, Anti-bribery and Anti-corruption.** Supplier shall uphold the highest standards of integrity in all business interactions. Suppliers shall have a zero-tolerance policy and prohibit any and all forms of bribery, corruption, extortion and embezzlement.

Bribes or other means of obtaining undue or improper advantage shall not be promised, offered, authorized, given, or accepted. No funds or assets of the supplier shall be paid, loaned or otherwise disbursed as bribes, "kickbacks," or other payments designed to influence or compromise the conduct of Command Alkon, its employees or representatives.

Suppliers must comply with applicable anti-bribery and anti-corruption laws (including but not limited to the United States Foreign Corrupt Practices Act, as amended, and the United Kingdom Bribery Act), and must have adequate policies and procedures in place to enforce and monitor compliance with such laws.



- 3.6.2 **Conflict of Interest.** Suppliers must avoid actual, potential, or perceived conflicts of interest with Command Alkon employees. If these occur, supplier must disclose such a conflict, so that appropriate steps are taken to manage the situation.
- 3.6.3 **Disclosure of Information.** All business dealings should be transparently performed and accurately reflected on supplier's business books and records. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.
- 3.6.4 **Intellectual Property.** Suppliers shall respect the intellectual property rights of others, including Command Alkon, its affiliates and business partners. Suppliers must take appropriate steps to safeguard and maintain confidential and proprietary information of Command Alkon and shall use such information only for the purposes specified for use by Command Alkon. Suppliers shall observe and respect all Command Alkon patents, trademarks, and copyrights and comply with all requirements as to their use as established by Command Alkon. Suppliers shall not transmit confidential or proprietary information of Command Alkon via the internet unless such information is encrypted in accordance with minimum standards established by Command Alkon.
- 3.6.5 **Fair Business, Advertising and Competition.** Suppliers shall conduct their business in full compliance with anti-trust and fair competition laws, and disclose information regarding business activities, structure, financial situation and performance in accordance with applicable laws. Standards of fair business, advertising and competition shall be upheld.
- 3.6.6 **Protection of Identity and Non-Retaliation.** Supplier shall implement and maintain programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers. Supplier should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.
- 3.6.7 **Privacy.** Supplier shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Supplier shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.



- 3.6.8 **Responsible Sourcing of Minerals.** Suppliers are expected to have a policy and exercise due diligence to reasonably assure that the tin, tantalum, tungsten, and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses. Suppliers shall provide information to Command Alkon upon request.
- 3.7 **Management System.** Suppliers should develop, maintain, and implement policies consistent with this Code and maintain appropriate management systems and documentation to demonstrate compliance with this Code. The management system should include the following elements:
- 3.7.1 **Company Commitment.** A corporate social and environmental responsibility policy statement affirming supplier's commitment to compliance and continual improvement, endorsed by executive management and posted in the facility in the local language.
- 3.7.2 **Management Accountability and Responsibility.** Identification of senior executive and company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.
- 3.7.3 **Legal and Customer Requirements.** A process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.
- 3.7.4 **Risk Assessment and Risk Management.** A process to identify and control the legal compliance, environmental, health and safety and labor practice and ethics risks associated with supplier's operations.
- 3.7.5 **Improvement Objectives.** Written performance objectives, targets and implementation plans to improve supplier's social and environmental performance, including a periodic assessment of supplier's performance in achieving those objectives.
- 3.7.6 **Training.** Programs for training managers and workers to implement supplier's policies, procedures, improvement objectives and to meet applicable legal and regulatory requirements.



- 3.7.7 **Communication.** A process for communicating clear and accurate information about supplier's policies, practices, expectations and performance to workers, suppliers and Command Alkon.
 - 3.7.8 **Worker Feedback, Participation and Grievance.** Ongoing processes, including an effective grievance mechanism, to assess workers' understanding of and obtain feedback on practices and conditions covered by this Code and to foster continuous improvement. Workers must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.
 - 3.7.9 **Audits and Assessments.** Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of this Code, and Command Alkon contractual requirements related to social and environmental responsibility.
 - 3.7.10 **Corrective Action Process.** A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.
 - 3.7.11 **Documentation and Records.** Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.
 - 3.7.12 **Supplier Responsibility.** A process to communicate Code requirements to suppliers and to monitor supplier compliance with this Code.
- 3.8 **Additional Requirements.**
- 3.8.1 **Export Sanctions / Terrorism Activities.** Command Alkon suppliers should not perform their obligations in any way that would cause Command Alkon nor themselves to be in violation of the U.S. or International Import/Export Controls. Neither suppliers nor any of their affiliates, nor any officer or director of the supplier or any of their affiliates, should be included on any lists of terrorists or terrorist organizations compiled by the U.S. government or any other national or international body. Command Alkon suppliers must:
 - (i) comply with the U.S. and all applicable international economic sanctions laws and regulations, as well as all applicable U.S. and international export controls applicable to Command Alkon or supplier;



- (ii) provide all information required by Command Alkon to comply with the U.S. and international sanctions. Specifically, suppliers are required to provide clear and convincing evidence that demonstrates the identity and location of all sub-tier suppliers involved in materials, components, goods, or articles provided to Command Alkon.
- (iii) not conduct business with individuals, entities, organizations, or countries that are the targets of the U.S. or applicable international economic sanctions laws and regulations;
- (iv) never participate in any boycott or restrictive trade practice in violation of the U.S. anti-boycott laws; and
- (v) not directly or indirectly engage in or support any terrorist activity or money laundering.

3.8.2 Solicitation by Suppliers. All suppliers shall comply with all guidelines issued by Command Alkon relating to access to Command Alkon facilities, offices and departments, and employees. No supplier shall use Command Alkon's computer system, including its electronic mail system and internet site, for purpose of sending unsolicited electronic mail messages to the Command Alkon community.

3.8.3 Monitoring and Compliance. Command Alkon or its representatives may engage in monitoring activities to confirm supplier's compliance to this Code, including on-site audits and inspections of facilities, use of questionnaires, review of publicly available information, or other measures necessary to assess supplier's performance and comply with applicable due diligence legal requirements. Any Command Alkon supplier or Command Alkon employee that becomes aware of violations of this Code is obligated to notify Command Alkon. Based on the assessment of information made available to Command Alkon, Command Alkon reserves the right (in addition to all other legal and contractual rights) to disqualify any potential supplier or terminate any relationship with any current supplier found to be in violation of this Code without liability to Command Alkon.

Suppliers are encouraged to take responsibility to continually improve their environmental, social conditions and ethical behavior.

Anyone can report concerns about illegal, unethical, or improper conduct. We enforce a strict policy prohibiting retaliation for reporting a concern or suspected misconduct in good faith.

To report your concern, please use one of the following methods to contact us:

- E-mail our Legal Department at legal@commandalkon.com



- Write to Command Alkon Incorporated, Legal Department, 6750 Crosby Court, Dublin, Ohio 43016
- Call 1-800-624-1872 (U.S. toll free) or 0-800-022-9682 (international toll free)

A supplier's failure to comply with this Code may result in the termination of any agreement as a Command Alkon supplier.

4.0 Application/Exclusion

This Code is a general statement of Command Alkon's expectations with respect to suppliers. All Command Alkon suppliers, their employees and extended supply chain are expected to comply with the requirements detailed in this Code. This Code should not be read in lieu of, but in addition to, any supplier obligations as set forth in any (i) request for proposal or other solicitation, or (ii) agreements by and between Command Alkon and the supplier. In the event of a conflict between this Code and any Command Alkon solicitation document or applicable agreement, the terms of the solicitation document or applicable agreement shall control.

No exclusions are applicable to this Code.

5.0 Acknowledgment

Supplier identified below confirms that:

- We have received and read Command Alkon's Supplier Code of Conduct ("Code").
- We agree to comply with the requirements detailed in the Code.
- We will promptly provide, upon request relevant to applicable laws or regulations, a supply chain map of products provided to Command Alkon that identifies all suppliers and sub-tier suppliers and their locations for the requested products.
- We will inform our employees, subcontractors and suppliers about the Code content and cascade the Code requirements down our entire supply chain and require their compliance with the provisions incorporated therein.
- We will report any case of violation of the Code to Command Alkon.

We agree to demonstrate compliance with this Code via questionnaire, assessment, or third-party audit per Command Alkon request.

We agree to cooperate and supply the necessary information to Command Alkon during its due diligence process to fulfill obligations of applicable legal requirements.



**Command
Alkon**

We authorize Command Alkon or any organization acting on behalf of Command Alkon to conduct audits at our premises and our subcontractor's premises in accordance with written agreements between Command Alkon and supplier to verify compliance with this Code.