

Supplier - Code Of Conduct

Haltec is dedicated to upholding the highest standards in human rights, environmental stewardship, legal compliance, and ethical business conduct. We view our Suppliers as valued partners and care deeply about how they operate. The Haltec Supplier Code of Conduct ("Code" or "Code of Conduct") reflects our commitment to fostering proactive, responsible collaboration that promotes lawful, ethical, and sustainable practices.

Our Supplier Partners are evaluated not only on economic factors but also, among other things, on their approach to environmental protection, human rights, labor standards, and anti-discrimination and anti-corruption policies. We are firmly committed to responsible sourcing and aim to work closely with our partners to enhance sustainability across our operations.

We expect our Supplier Partners to comply with all applicable laws and align with internationally recognized environmental, social, and governance (ESG) standards. Partners should either follow Haltec's Code or maintain equivalent policies that reflect these expectations. Furthermore, we encourage our Suppliers to extend these standards throughout their own supply chains. Notwithstanding anything set forth in this Code of Conduct, to the extent that any terms, confidentiality agreement, supply agreement, or any other agreement or arrangement between Haltec and any Supplier Partner imposes more stringent terms or obligations on a Supplier Partner, those more stringent terms or obligations shall control.

Haltec reserves the right to amend or modify this Code of Conduct at any time without notice. Violations or concerns may be reported to Haltec at (330) 222-1501. Please visit [Haltec Supplier Standard Terms and Conditions.pdf](#) for Haltec's Supplier Terms and Conditions.

Discrimination

Suppliers are expected to uphold principles of non-discrimination and comply with all non-discrimination laws and regulations across all interactions with workers, customers, and business partners. Discrimination based on race, color, national origin, ancestry, sex, gender identity or expression, transgender status, age, sexual orientation, religion, veteran status, disability (actual or perceived), union affiliation, genetic information, marital status, pregnancy, lawful migrant status, or any similar characteristic protected under local law is strictly prohibited in hiring, employment terms, and workplace practices.

Suppliers must ensure equal opportunity and promote equal participation for all workers in every aspect of employment, including compensation, benefits, training, performance evaluation, and access to career development.

Any form of physical abuse, verbal or sexual harassment, intimidation, or other abusive conduct is unacceptable and must be actively prevented.

Harassment & Abuse

Suppliers must uphold a workplace culture rooted in dignity and respect for all workers. They are expected to neither engage in nor permit any form of harassment or abuse, including discrimination, physical or verbal mistreatment, mental or sexual harassment, psychological intimidation, or coercive behavior. It is essential that all workers are safeguarded against retaliation, particularly when reporting incidents of harassment or abuse.

Diversity, Equity, And Inclusion

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Haltec encourages its Supplier Partners to cultivate inclusive workplace cultures where diversity is embraced, and every individual is empowered to reach their full potential. Suppliers are expected to uphold environments free from discrimination or harassment based on race, color, religion, age, sex, sexual orientation, gender identity, national origin, disability, veteran status, genetic information, pregnancy, or any other characteristic protected under applicable local laws.

Work Hours, Wages and Benefits

Supplier Partners are required to comply with all applicable labor laws and regulations related to compensation and working hours for both salaried and hourly employees. They must ensure that workers receive wages and benefits that meet or exceed legal requirements, local industry standards, or the terms outlined in written employment agreements—whichever is most favorable to the worker. This includes paying overtime at the legally mandated rate.

Wage deductions as a form of discipline are strictly prohibited. All compensation owed must be paid promptly and in full accordance with applicable laws. Additionally, Suppliers must maintain complete, transparent, and accurate records of employee compensation and hours worked, ensuring ongoing accountability.

Child Labor

Suppliers must not employ individuals under the age of 15, the legal minimum age for employment, or the age at which compulsory education is completed—whichever is highest under the laws which Supplier is subject. They are required to comply with all relevant laws and the standards outlined in the ILO Minimum Age Convention (No. 138) for workers under 18. Robust verification processes must be in place to prevent the recruitment of child labor.

Regarding forced labor and human trafficking, Suppliers must ensure that no form of forced labor is used—including bonded labor, indentured servitude, involuntary prison labor, or slavery—as defined by the ILO Forced Labor Convention (No. 29) and the Abolition of Forced Labor Convention (No. 105). Suppliers are also expected to avoid charging recruitment fees or engaging in deceptive hiring practices.

Forced Labor and Human Trafficking

Supplier Partners are strictly prohibited from engaging in human trafficking or employing any form of forced, involuntary, or slave labor. Additionally, they must not source materials or services from entities known to utilize such unethical labor practices. Supplier Partners are expected to conduct due diligence on the presence of forced labor, child labor, or human trafficking in their supply chain to ensure compliance.

Use of Private or Public Security Forces

If a Supplier employs its own security personnel or engages private security service providers, it must ensure that these forces uphold internationally recognized human rights standards and comply with all applicable laws in their operations. Suppliers must not contract with private or public security entities that have a record of violating human rights or fail to demonstrate a commitment to ethical conduct.

Freedom of Association & Collective Bargaining

Suppliers must uphold and respect workers' rights to freely associate, organize, and engage in collective bargaining through lawful and peaceful means, without fear of retaliation, penalty, or interference. In cases where workers are represented by a union, Suppliers are expected to engage in constructive dialogue with their chosen representatives and negotiate in good faith.

Worker Feedback and Grievance Mechanisms

Suppliers are required to implement a confidential, impartial, and non-retaliatory grievance mechanism that allows workers to voice concerns safely and without fear of intimidation. Any form of retaliation against individuals who seek guidance or report misconduct—including potential violations of this Code of Conduct—is strictly prohibited. Suspected violations may be reported directly to Haltec at (330) 222-1501.

Health & Safety

Suppliers are responsible for maintaining a safe and healthy work environment that complies with all relevant laws and regulations governing workplace conditions. They must take steps to actively reduce the risk of accidents, injuries, and occupational illnesses to ensure a productive and secure setting for all workers.

Facilities must include, at minimum, accessible and adequate restrooms, potable drinking water, hygienic food preparation and dining areas, proper ventilation, sufficient lighting, and effective temperature control, and otherwise must comply with applicable law. If housing is provided, living conditions must be clean, safe, and reasonably comfortable.

Suppliers are expected to implement appropriate safety controls, procedures, preventive maintenance, and provide necessary protective equipment. Worksites must be structurally sound and well maintained. Fire exits must remain clear and accessible at all times, and suppliers must provide safety equipment, evacuation plans, and conduct regular evacuation drills.

Animal Welfare

Suppliers must adhere to all applicable local and international laws and standards regarding the ethical, humane, and lawful treatment of animals. This includes compliance with the “Five Freedoms of Care” as endorsed by the World Organization for Animal Health:

- Freedom from thirst, hunger, and malnutrition
- Freedom from fear and distress
- Freedom from heat stress or physical discomfort
- Freedom from pain, injury, and disease
- Freedom to express normal patterns of behavior

Suppliers are also expected to follow all relevant Haltec policies concerning animal welfare.

Environmental Responsibility

Suppliers must avoid activities that result in harmful soil degradation, water or air pollution, excessive noise emissions, or unsustainable water usage—especially when such impacts compromise access to clean food, drinking water, or sanitary facilities, or pose a threat to human health.

Suppliers are encouraged to minimize or eliminate waste of all kinds—including raw materials, water, and energy—through efficient processes, material substitution, and conservation practices. They should also implement systems for responsible product end-of-life management, such as recycling and reuse.

Haltec further encourages Suppliers to adopt and enforce no-deforestation policies and to commit to protecting areas of high conservation value and high carbon stock.

Suppliers are expected to actively measure, manage, and disclose their environmental impacts in key areas such as greenhouse gas (GHG) emissions, water usage, and waste generation, and, where required by applicable law, report the same to the relevant authority. Setting reduction targets and implementing action plans is strongly encouraged. Public reporting of annual environmental performance, even where not required by law, is recommended to promote transparency and continuous improvement.

Climate and Environmental Stewardship

Haltec expects its Supplier Partners to actively improve the environmental performance of their products and operations. Suppliers should set measurable targets and consistently monitor greenhouse gas (GHG) emissions, addressing environmental challenges with diligence and integrity.

Suppliers are required to establish appropriate corporate goals for Scope 1, 2, and 3 emissions and implement effective measures to achieve these objectives. Regular monitoring and transparent reporting of progress are essential to ensure accountability and continuous improvement. Haltec also encourages Suppliers to contribute to the advancement and adoption of environmentally sustainable technologies.

Resource and Energy Management

Suppliers are expected to monitor, track, and document their consumption of natural resources—including water, raw materials, and energy—in order to identify areas they can control or influence. This process should support efforts to reduce and optimize resource usage.

Consumption data must be recorded at both the corporate and operational levels and made available to Haltec Corporation upon request. Suppliers are required to implement systems that minimize energy waste, enhance energy efficiency, and reduce overall energy consumption.

Additionally, Suppliers should set clear goals for transitioning to renewable energy sources and commit to regular reporting on energy usage and related emissions to ensure transparency and continuous improvement.

Ecosystem and Biodiversity Protection

Suppliers are expected to safeguard ecosystems, with particular attention to key biodiversity areas affected by their operations. They must actively avoid illegal deforestation (whether directly or indirectly) and comply with international biodiversity standards, including the IUCN Resolutions and Recommendations on Biodiversity.

All Suppliers must be fully aware of and adhere to applicable environmental laws and regulations, responsibly managing their environmental impacts. This includes obtaining all necessary permits and licenses and strictly following their conditions.

Suppliers should regularly monitor and manage their influence on soil quality to prevent erosion, nutrient depletion, subsidence, and contamination, ensuring long-term environmental sustainability.

Land Rights and Forced Eviction

Suppliers must avoid any actions that result in forced eviction or the unjust deprivation of land, forests, or water resources during the acquisition, development, or use of such areas. Respect for land rights and responsible stewardship of natural resources is essential to ensuring ethical and sustainable business practices.

Responsible Chemical Management

Supplier Partners are expected to identify, minimize, or eliminate the use of restricted substances in both manufacturing processes and finished products to ensure full compliance with applicable regulations. They must maintain awareness of any restricted substances used and proactively seek safer alternatives to support product integrity and environmental stewardship.

Workplace Security

Supplier Partners must prioritize the safety and well-being of their workforce and others by proactively implementing measures to prevent workplace violence. Any individual who engages in inappropriate or unlawful behavior must be addressed promptly through appropriate corrective actions. Maintaining a secure and respectful environment is essential to fostering a productive and ethical workplace.

Rights of Minorities and Indigenous Peoples

Suppliers must respect the rights of local communities, including but not limited to, minorities and Indigenous Peoples, by supporting access to decent living conditions, education, employment, and social participation. Suppliers must honor the communities' connection to and stewardship of their traditional lands and resources.

Business Records

Supplier Partners are required to maintain accurate, transparent, and up-to-date records of their business operations, organizational structure, financial status, and performance. All disclosures must comply with applicable laws, regulations, and recognized industry standards to ensure integrity and accountability.

Supplier Engagement – Subcontracting

Suppliers may engage Subcontractors only with prior written authorization from Haltec and otherwise in accordance with the terms outlined in their agreement with Haltec. Regardless of approved subcontracting arrangements, the Supplier remains fully responsible for fulfilling all contractual obligations. Additionally, Suppliers must ensure that all approved Subcontractors are informed of and agree in writing to comply with the applicable provisions of this Code of Conduct.

Legal and Ethical Sourcing

Haltec is committed to sourcing products and services in a legal and ethical manner. The company will not knowingly procure goods or services that are illegally harvested, produced, or traded, nor those linked to forced or involuntary labor. Suppliers are required to implement the standards outlined in this Code, monitor compliance effectively, and communicate expectations clearly to all workers and supervisors in a language they understand.

Legal Compliance

Suppliers are required to operate in full accordance with all applicable international, federal, state, and local laws and regulations. They must obtain, retain, and maintain and at all times comply with all necessary government-issued licenses, permits and certificates. In all interactions with regulatory agencies and government officials, Suppliers must be honest, transparent, and forthcoming.

Corruption & Bribery

Suppliers, along with their representatives and employees, must not engage in or tolerate any form of corruption, bribery, extortion, or embezzlement. Participation in bribes or kickbacks—whether involving public officials or private individuals—is strictly prohibited. Suppliers must comply with all relevant anti-corruption and anti-money laundering laws, including those governing lobbying, gifts, payments to public officials, and political contributions. This includes adherence to the U.S. Foreign Corrupt Practices Act (FCPA) and all applicable local regulations.

Conflict of Interest

Haltec expects its Suppliers to avoid all conflicts of interest or situations that give rise to the appearance of a potential conflict of interest. Suppliers must promptly disclose to Haltec any actual, perceived, or potential conflicts of interest arising from business or personal relationships with Haltec's customers, suppliers, business partners, employees, or competitors. Disclosures can be made by contacting Haltec at (330) 222-1501.

Counterfeit Parts

Suppliers are strictly prohibited from using counterfeit parts in any products supplied to Haltec. They must implement

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robust quality control systems—including regular inspections and testing—to prevent the introduction of counterfeit components. Suppliers are also responsible for ensuring that all entities within their supply chain use only authentic, verified materials. If counterfeit parts or materials are detected or suspected, Suppliers must provide immediate notification to Haltec.

Conflict Minerals

Suppliers must adhere to the United States Federal law and regulations (including those of the United States Securities and Exchange Commission) regarding conflict minerals – specifically gold, tin, tantalum, and tungsten (also known as 3TG). We expect our Suppliers whose products contain these minerals to conduct due diligence on the source and chain of custody for these minerals. Suppliers will be expected to provide details regarding the source, amount, and type of minerals contained in their products on an annual basis.

Fair Competition & Marketing

Haltec is committed to fair competition and honest dealings with customers and suppliers. Suppliers must uphold ethical standards in advertising, sales, and competitive practices. Compliance with all applicable antitrust and competition laws is required, including prohibitions against collusion or agreements that manipulate pricing, costs, or terms of sale.

Monitoring & Compliance

Suppliers must grant Haltec representatives—including Haltec authorized third parties such as auditors—access to their facilities and documentation, whether visits are scheduled or unannounced, to assess compliance with this Code of Conduct. Suppliers are expected to engage with Haltec in an honest, transparent, and cooperative manner. Any identified non-compliance must be addressed promptly through appropriate corrective actions. Suppliers are also required to maintain complete and accurate records that demonstrate ongoing adherence to this Code.

Confidentiality, Privacy, and Data Security

Suppliers must treat all supply agreements and arrangements with Haltec as confidential, unless disclosure is legally required by applicable law, court order, or government directive. They are responsible for safeguarding the privacy, and confidentiality, integrity and availability - of all data related to Haltec's customers, employees, and clients—including personal information—and must process such data in accordance with contractual terms and all relevant legal requirements. Haltec expects our Suppliers to afford their employees, agents, and contractors and customers these same obligations and protections where appropriate and/or legally required.

In furtherance of the foregoing, Haltec expects all Suppliers to comply with the Haltec Corporation Supplier and Third-Party Security Policy, available at [About Us - HALTEC Corporationhttps://www.haltec.com/pc/About-Us-d1.htm](https://www.haltec.com/pc/About-Us-d1.htm)

Unless otherwise specified in a signed agreement, Suppliers may only collect, use, retain, or share only the information necessary to fulfill their contractual obligations to Haltec. Disclosure, including selling or sharing personal data, is strictly prohibited. Any actual or suspected data breach must be reported to Haltec immediately.

Suppliers must implement appropriate technical, organizational, and physical safeguards to protect any data they collect, access, store, process, or receive on behalf of Haltec. All data handling must comply with applicable privacy laws and standards, including but not limited to the General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA), and other relevant local, state, federal, or international regulations.

Intellectual Property

Suppliers must comply with all relevant national and international laws governing the protection of intellectual property. "Intellectual Property" includes, but is not limited to patents, marks, copyrights, tradenames, trademarks and copyrights., service marks, trade secrets (including technical know-how), logos, trade dress, name or identifying marks, and obligations under competition law, whether registered or unregistered. Suppliers are responsible for ensuring they

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possess all necessary usage rights to prevent infringement of third-party Intellectual Property. All Haltec Intellectual Property is solely owned by Haltec. Supplier acknowledges that it does not have any right, title or interest in any Haltec Intellectual Property, all of which is reserved by Haltec, except as otherwise expressly authorized by Haltec.

Export Controls & Economic Sanctions

Supplier Partners are required to adhere to all applicable export control regulations and laws that restrict or prohibit business dealings with sanctioned countries, entities, individuals, or industry sectors. They must conduct thorough due diligence to ensure compliance with sanctions, export controls, and anti-boycott laws. Additionally, Suppliers are expected to maintain accurate and complete documentation related to customs and trade activities.