



CODE OF CONDUCT FOR SUPPLIERS TO ELECTRICAL COMPONENTS INTERNATIONAL, INC.

This Supplier Code of Conduct (“Code”) applies to all suppliers and their subsidiaries, joint ventures, and affiliates (collectively “Suppliers”) who provide products and services to Electrical Components International, Inc., its affiliates and subsidiaries (collectively “ECI” or “the Company”). This Code supplements ECI’s Purchase Order Terms and Conditions and other agreements with ECI, but is not meant to supersede them. In the event of a conflict between the terms of this Code and other agreements with ECI, such other agreements prevail.

Labor and Human Rights

The Company believes all human beings should be treated with dignity and respect and is committed to upholding internationally recognized human rights of all people. ECI uses all reasonable efforts to avoid causing or contributing to human rights abuses and supports adopting fair and sustainable business practices in our supply chain.

Employment and Discrimination

Suppliers must ensure equal opportunity in employment and not discriminate based on any legally protected status as may be recognized under the laws of the locations where the Suppliers conduct business. Suppliers must ensure that workers are not subjected to harassment or abuse and have legal authorization to work in their place of employment. Suppliers are expected to support a workplace free of harassment and discrimination, including with respect to women’s rights and equal opportunity.

Forced Labor

Suppliers agree to comply with applicable human rights laws, including those relating to slavery and human trafficking, in all business locations. Further, neither Suppliers nor its sub-suppliers will use or tolerate forced or involuntary labor, including slavery and human trafficking. Suppliers shall not threaten or subject workers to harsh or inhumane treatment (*e.g.* verbal abuse and harassment, psychological harassment, mental and physical coercion, sexual harassment, etc.) to force labor from them.

Child Labor

Suppliers will not use or tolerate any type of child labor that fails to comply with International Labour Organization (“ILO”) Conventions 182 (prohibiting the worst forms of child labor) and 138 (setting minimum working age standards). Suppliers will not employ persons under the age of 18 for work that will likely harm their health, safety, or education.

Wages and benefits

Suppliers shall ensure that their workers receive at least the mandated minimum wages and benefits in accordance with local laws, including any required vacations, leave of absence, holidays, bonuses,



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and overtime pay. Per local laws and customs, Suppliers shall pay earned wages in an accurate and timely manner and shall not use wage deductions in an improper manner (*e.g.*, unjust punishment.). ECI encourages Suppliers to pay their employees a living wage, which is enough to maintain a normal standard of living.

Ethical Recruiting

Suppliers shall use ethical recruitment practices and comply with applicable laws relating to recruitment and employment. Suppliers shall not charge workers recruitment fees or related costs to obtain employment, and shall not retain worker identity documents, passports, or work permits as a condition of employment, except where required by law and with appropriate safeguards. Where labor agents or recruiters are used, Suppliers shall take reasonable steps to ensure such parties act in compliance with this Code.

Rights of Minorities and Indigenous Peoples; Community Impacts

Suppliers shall respect the rights and dignity of individuals and communities potentially impacted by their operations, including minorities and Indigenous Peoples, consistent with applicable law. Where relevant to a Supplier's operations, Suppliers should seek to identify and mitigate material adverse human rights impacts on local communities.

Land, Forest and Water Rights; Forced Eviction

Suppliers shall respect land, forest, and water rights in accordance with applicable law and shall not support or tolerate forced eviction or involuntary displacement in connection with their operations. Where land acquisition, site expansion, or resource access is relevant to the Supplier's operations, Suppliers should maintain processes reasonably designed to identify, address, and mitigate related human rights risks.

Use of Public or Private Security Forces

Where public or private security personnel are engaged in connection with a Supplier's operations, Suppliers shall take reasonable steps to ensure security activities are conducted in accordance with applicable law and with respect for human rights. Suppliers shall not tolerate conduct by security personnel that involves excessive force, inhumane treatment, or other human rights abuses.

Health and Safety

Occupational Health, Safety, and Hazard Prevention

One of ECI's core values is that its employees return home, safe and healthy, to their families every day. That core value extends to the employees of ECI's Suppliers. Suppliers shall provide workers with a safe and healthy work environment. Suppliers shall take measures to support accident prevention and minimize health risk exposure, such as using appropriate personal protective equipment and instruction on its proper use.

Working Conditions

Suppliers shall provide workers with reasonably accessible and clean facilities and potable water. If provided, any Supplier-provided food and storage facilities shall be sanitary and fit for consumption.

Reporting Incidents

Suppliers shall permit workers to report health and safety incidents and near-misses. Suppliers will investigate reports and implement corrective action as needed.



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Environment

Environmental Permits and Reporting

Suppliers shall understand and comply with all environmental laws, policies, procedures, and guidelines that apply to your job responsibilities.

Minimizing Environmental Impact

Suppliers will try to minimize the environmental impact of their operations, products, solutions, and services. Suppliers' environmental systems should aim to restore and preserve the environment in areas such as (1) waste disposal, (2) air quality, (3) greenhouse gas emissions, and (4) water consumption. Upon request, Suppliers shall provide ECI with their Scope 1 and Scope 2 greenhouse gas emissions.

Reducing Environmental Footprint

In compliance with applicable laws, Suppliers shall conduct their business in a way that reasonably minimizes waste, including the use of recycling and reducing their environmental footprint.

Environmental Sustainability Focus Areas

Suppliers are encouraged to identify, prioritize, and progressively improve practices that reduce environmental impacts, as appropriate to their operations. Areas of focus may include energy efficiency, renewable energy, decarbonization, responsible chemical management, sustainable resource management, waste reduction, reuse and recycling, biodiversity and land use considerations (including deforestation risk), soil quality, noise emissions, and animal welfare where relevant. Suppliers shall comply with applicable environmental laws and, upon request, support ECI's reasonable information requests related to these topics.

Ethical Conduct

Avoidance of Conflicts of Interest

Without proper disclosure and authorization from ECI, Suppliers will not allow ECI employees to accept personal services, payments, or loans or knowingly allow an ECI employee's close family member to work for Suppliers in a capacity that may affect the ECI employee's decisions at ECI. In addition, Suppliers agree not to provide confidential information regarding Suppliers to ECI employees unless Suppliers and ECI have both given prior approval.

Avoidance of Improper Gifts and Gratuities

All ECI employees must abide by the Company's policies and procedures concerning accepting gifts, hospitality, and entertainment. Suppliers must never offer any gifts, entertainment, or other business courtesies where doing so could compromise or be reasonably seen to compromise the ECI employee's judgment, integrity, or impartiality. If Suppliers provide gifts or gratuities to ECI employees, they must never be in cash.

Business Integrity

Suppliers shall act ethically and comply with all global laws and regulations, even when doing so



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might be more time-consuming and expensive. Suppliers shall not engage in corruption, extortion, embezzlement, kickbacks, or bribery to obtain an unfair or improper business advantage. Suppliers shall abide by all applicable anti-corruption laws and regulations of the locations in which it conducts business, including the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and other applicable anti-corruption laws wherever it does business.

Fair Business, Advertising, and Competition

ECI believes in fair, free, and open markets and works hard to compete honestly and fairly. Suppliers shall comply with applicable laws relating to fair business, advertising, and competition. Suppliers agree to compete strictly on the merits of their products and services and make no attempt to restrain or limit trade in violation of applicable antitrust or competition laws. Neither Suppliers nor Suppliers' subcontractors or agents will directly or indirectly provide, or offer to provide, anything of value or for the benefit of any government official to obtain or retain any contract, business opportunity or other benefit, or to influence any act or decision of that person in his or her official capacity. Suppliers agree to have reasonable procedures in place to inform and educate its employees to promote compliance with these laws and policies.

Anti-Money Laundering (AML)

Suppliers shall comply with applicable anti-money laundering and counter-terrorist financing laws and shall maintain reasonable procedures designed to detect and prevent money laundering, including appropriate due diligence on relevant third parties and accurate recording of transactions.

Accurate Records and Financial Responsibility

Suppliers shall maintain accurate and complete books, records, and accounts, and shall not engage in false, misleading, or improper entries or documentation. Records shall be retained and made available as required by applicable law and contractual obligations.

Disclosure of Information

Suppliers shall accurately maintain any records required by law and disclose such records as may be required by applicable laws. Where Suppliers provide information to ECI (including sustainability, compliance, or supply chain information), Suppliers shall take reasonable steps to ensure such information is accurate and not misleading.

Protection of Intellectual Property

Suppliers shall respect and protect the legal intellectual property, trademark, and copyrights of others, including the Company.

Privacy

Suppliers shall protect the reasonable privacy expectations of the Company's personal information. Suppliers will respect and protect the Company's information, particularly the Company's confidential and proprietary information, from any improper use or disclosure.



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Data Protection and Data Security

Suppliers shall protect ECI's confidential and proprietary information and any personal information processed on ECI's behalf. Suppliers shall implement reasonable administrative, technical, and physical safeguards designed to protect information from unauthorized access, disclosure, alteration, or loss, and shall promptly report to ECI any material suspected or confirmed security incident affecting ECI data, in accordance with contractual requirements.

Export Controls and Economic Sanctions

Suppliers shall comply with applicable export controls, customs laws, and economic sanctions regulations. Suppliers shall not provide products, services, or technology to ECI in a manner that would cause ECI to violate applicable export control or sanctions restrictions, and shall provide relevant information and documentation upon request.

Counterfeit Parts

Suppliers shall have reasonable processes designed to prevent the introduction of counterfeit, substandard, or unauthorized parts and materials into products supplied to ECI. Where applicable, Suppliers shall maintain traceability controls and notify ECI promptly if counterfeit parts are suspected or identified.

Reporting Concerns

ECI encourages Suppliers to report activity they believe violates the law, this Code, ECI's Code of Conduct and Business Ethics, or ethical business practices. Suppliers may report concerns to any of the following as appropriate:

- The ECI buyer who is the primary contact
- ECI's General Counsel via email or telephone
- The ECI Ethics Helpline at eciethicshelpine.com. ECI's Ethics Helpline is run by an independent third party and is available 24/7, 365 days a year. Reports to the Helpline may be made anonymously if desired.

No Retaliation. Suppliers that report a concern or potential misconduct in good faith are doing the right thing. ECI will not tolerate retaliation against such Suppliers

Accountability For The Code

Management Accountability and Responsibility

ECI expects Suppliers to have their management do or have processes in place that:

- Communicate this Code to workers and subcontractors who provide products and materials to the Company.
- Comply with this Code, perform audits to this Code, and comply with laws and regulations that apply to their business.
- Require risk assessments and implement risk management systems to mitigate the environmental, health and safety, and labor practice risks related to their activities, and



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provide documentation regarding same upon request from ECI.

- Ensure the integrity of financial reports and information following applicable generally accepted standards.
- Communicate the requirements of this Code down to their own sub-suppliers and down the supply chain.
- Suppliers shall incorporate requirements that are substantially similar to this Code into their own supplier standards and, where practicable, into contracts or purchase terms with their sub-suppliers that support products or services provided to ECI, and shall take reasonable steps to verify compliance.