



KETT ENGINEERING CORPORATION

SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct (“Code”) articulates Kett Engineering’s (“Kett”) expectations of our suppliers and business partners doing business with Kett (“suppliers”). This Code is based on our corporate values for responsible and sustainable operations. Suppliers are expected to understand and act consistent with Kett’s approach to integrity, responsible sourcing, supply chain management and business ethics. Kett expects suppliers will cascade similar expectations through their own supply chains. Kett is committed to only doing business with suppliers that meet our standards and behave consistently with, and positively reflect, Kett’s values throughout the supply chain. Kett expects that suppliers will satisfy contractual requirements, comply with laws, regulations, and Kett policies and act consistently with the principles and values of our Kett Code of Conduct and Business Ethics policies and this Supplier Code of Conduct.

HUMAN RIGHTS Kett requires all suppliers to have processes in place to prevent, mitigate, and take effective measures to remediate adverse human rights impacts. Suppliers are required to adhere to and cascade Kett’s Human Rights Policy or equivalent expectations throughout their supply chain. Freely Chosen Employment Suppliers and their employment agencies will not use slave, forced prisoner, bonded, indentured, or any other form of forced or involuntary labor. Suppliers will also not engage, directly or indirectly, in human trafficking. Suppliers will provide all workers with a notification that contains a description of terms and conditions of employment as part of the hiring process. Employees must be free to terminate their employment without penalty.

Kett has a zero-tolerance policy regarding the use child labor. Suppliers will implement an appropriate mechanism to verify that the age of workers and will provide substantiation of this verification upon request. If child labor is discovered in its supply chain, suppliers will cease employment of the child/children and take reasonable measures to enroll the child/children in a remediation/education program. Suppliers will not use workers under the age of 18 (“young workers”) to perform work that is likely to jeopardize their health or safety. If young workers are found to be involved in work that is likely to jeopardize their health or safety, suppliers will take

reasonable measures to immediately remove the young workers from the situation and provide alternative work that is age appropriate.

WORKING HOURS Suppliers will comply with state, federal and local laws regarding working hours. Working hours must not exceed the maximum set by local law.

WAGES AND BENEFITS Suppliers and their employment agencies will pay wages and provide benefits and compensation to workers that comply with all applicable wage laws and regulations, including those relating to minimum wages, overtime hours, medical leave, and legally mandated benefits. Suppliers will refrain from making any deductions from wages as a disciplinary measure or imposing any financial burdens on workers related to recruitment costs. For each pay period, suppliers will provide workers with a timely and understandable written wage statement that includes sufficient information to verify accurate compensation for work performed.

Workers shall receive equal pay for equal work, including paying a fair wage that meets or exceeds legal minimum standards. All use of temporary, dispatch and outsourced labor shall be within the limits of the local law. In the absence of local law, the wage rate for student workers, interns, and apprentices should be at least a substantially similar wage rate as other entry-level workers performing equal or similar tasks. Workers must be paid directly, in a timely fashion, and in recognized currency. Suppliers will keep records of worker hours and wage documentation in accordance with local law.

HUMANE TREATMENT Suppliers will not engage in 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. Suppliers will have disciplinary policies and procedures in place for any violations of these requirements that are clearly defined and communicated to workers.

RECRUITING PRACTICES Suppliers will not require workers to pay recruitment fees or other fees related to recruiting for their employment. Suppliers will provide full reimbursement to job seekers and workers if they have been required to pay any such fees or related costs.

Non-DISCRIMINATION/NON-HARASSMENT Suppliers will be committed to a workplace free of harassment and unlawful discrimination. Suppliers will not engage in discrimination, harassment, intimidation, violence, or other adverse actions to employees based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, covered veteran status, protected genetic information, marital status or any other basis prohibited by law including in hiring and employment practices such as wages, promotions, rewards, and access to training.

FREEDOM OF ASSOCIATION Suppliers will comply with and respect all applicable laws related to the rights of workers to form and join trade unions of their own choosing, to bargain collectively, to engage in peaceful assembly, as well as respect the right of workers to refrain from such activities. Suppliers will avoid any form of threats, intimidation, physical or legal attacks against stakeholders, including union members and union representatives, exercising their legal rights to freedom of expression, association, and peaceful assembly.

VULNERABLE GROUPS Suppliers will commit to protect the rights of vulnerable groups within their organizations and supply chains, particularly the rights of women, indigenous peoples, children, and migrant workers. Suppliers will develop and implement internal measures to provide equal pay and opportunities throughout all levels of employment. Suppliers will also implement measures to address health and safety concerns that are particularly prevalent among women workers, including, but not limited to, preventing sexual harassment, offering physical security, and providing reasonable accommodation for nursing mothers.

HUMAN RIGHTS DEFENDERS Human rights defenders are individuals or groups who act to promote and protect human rights and fundamental freedoms through peaceful means. Suppliers will commit to neither tolerate nor contribute to threats, intimidation, or attacks against human rights defenders in relation to their operations to create safe and enabling environments for civic engagement and human rights at local, national, or international levels.

DIVERSITY, EQUITY, AND INCLUSION Kett encourages suppliers to develop and promote inclusive cultures where diversity is valued and celebrated, and everyone is able to contribute fully and reach their full potential. Suppliers should encourage diversity in all levels of their workforce and leadership.

HEALTH & SAFETY Suppliers will provide clean, healthy, and safe working environments for their personnel that meet or exceed legal standards. Suppliers will have safety procedures for their employees with a goal of zero workplace accidents. Supplier employees will have the right to refuse work and report any conditions that do not meet these criteria. Suppliers will also properly manage the health and safety of contractors performing work on supplier's premises.

OCCUPATIONAL SAFETY Suppliers will assess, identify, and mitigate potential for exposure to all health and safety hazards including eliminating hazards, substituting processes or materials, implementing engineering and administrative controls, preventative maintenance, and safe work procedures (including lockout/tagout). Suppliers will provide ongoing occupational health and safety training, including prior to the beginning of work. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Where hazards cannot be adequately controlled by these means, suppliers will provide workers with appropriate, well-maintained, personal protective equipment (PPE) and associated training on how and when it is required. Suppliers will also provide communication and training to their workforce regarding the risks to them associated with these hazards.

EMERGENCY PREPAREDNESS Suppliers will work to actively identify and assess potential emergency situations and events and minimize their impact by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Suppliers will execute emergency drills at least annually or as required by local law. Emergency plans should include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans.

PHYSICALLY DEMANDING WORK Suppliers will identify, evaluate, and control worker 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.

MACHINE SAFEGUARDING Suppliers will evaluate production and other machinery for safety hazards. Physical guards, safeguarding devices, and barriers must be provided and properly maintained where machinery presents an injury hazard to workers.

OCCUPATIONAL INJURY AND ILLNESS Suppliers will have procedures and systems to prevent, investigate, root cause, 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 the return of workers to work.

ENVIRONMENT AND SUSTAINABILITY Kett is committed to environmental protection and sustainability. Kett suppliers will continually strive to protect the environment, while working to solve the sustainability challenges of the future. Kett suppliers must also continually strive to conserve natural resources through re-use, conservation, recycling, or other means. Suppliers

should promote the use of sustainable, renewable natural resources while reducing emissions, pollution, and waste.

POLLUTION PREVENTION Suppliers will minimize or eliminate emissions and discharges of pollutants and generation of waste at the source or by practices such as adding pollution control equipment, modifying production, maintenance, and facility processes, or by other means.

GREENHOUSE GAS EMISSIONS Suppliers will continually strive to reduce greenhouse gas emissions. Suppliers shall establish emission reduction goals.

OTHER AIR EMISSIONS Suppliers will follow applicable local, national, and international air pollution control laws. Suppliers will characterize, routinely monitor, control, and treat emissions of air pollutants as required by law. Ozone depleting substances must be effectively managed in accordance with applicable regulations.

HAZARDOUS SUBSTANCES Suppliers will identify, label, store, and manage chemicals, waste, and other materials posing a hazard to human health or the environment and will use safe handling, movement, storage, use, recycling or reuse, and disposal in compliance applicable laws and regulations. Suppliers will look for ways to reduce the use of hazardous materials and substances of concern within products and their manufacturing processes.

MATERIALS RESTRICTIONS Suppliers will adhere to all applicable laws, and regulations regarding restrictions and prohibitions of specific substances in products and manufacturing including labeling and disposal.

SOLID WASTE Suppliers will implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).

WATER MANAGEMENT Suppliers will 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. Suppliers will conduct routine monitoring of their wastewater treatment and containment systems for optimal performance and to meet regulatory compliance. Suppliers should effectively reuse and recycle water. Supplier should prevent unpermitted discharges and mitigate the potential impacts of such discharges and from flooding caused by rainwater run-off.

CONTINUOUS IMPROVEMENT Suppliers will take measures to increase innovation and efficiency throughout their companies and reduce their carbon footprint, energy use, water use, material use, wastes, and other emissions. Suppliers should have a sustainable procurement policy in place to communicate sustainability expectations through the supply chain. Suppliers will set sustainability goals, accurately track results, and report on progress.

RESPONSIBLE SOURCING DUE DILIGENCE Suppliers will implement a policy committing to the responsible sourcing of all minerals and materials. These policies require conducting due diligence in accordance with the guidance for responsible supply chains.

LAND RIGHTS Suppliers will respect the communities in which they are based and serve. Suppliers will respect the land rights of individuals, indigenous people, and local communities in accordance with local laws and requirements with consideration for the presence of vulnerable groups. Suppliers should also protect ecosystems, especially key biodiversity areas, impacted by their operations. Suppliers should routinely monitor and control their impact on soil quality to prevent soil erosion, nutrient degradation, subsidence, and contamination. Suppliers should routinely monitor and control the levels of industrial noise to avoid noise pollution.

BUSINESS INTEGRITY ANTI-CORRUPTION/ANTI-BRIBERY Suppliers will not tolerate corruption, bribery, money laundering, embezzlement, extortion, or fraud in any form. This includes giving or receiving anything of value, including money, gifts, or unlawful incentives to

improperly influence negotiations or any other dealings with governments and government officials, customers, or any other third parties. All of supplier business dealings will be transparently performed and accurately reflected on the supplier's business books and records. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

INTELLECTUAL PROPERTY Suppliers will respect intellectual property rights. Transfer of technology and know-how must be done in a manner that protects intellectual property rights, and customer and supplier information must be safeguarded.

PRIVACY Suppliers will protect the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers will comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

EXPORT CONTROLS AND ECONOMIC SANCTIONS Suppliers will comply with all applicable restrictions on the export, re-export, release or other transfer of goods, software, services, and technology; all applicable economic sanctions restrictions involving certain territories, entities and individuals (to include conducting appropriate due diligence on third parties); and all other similar trade-related laws and regulations.

ETHICAL BEHAVIOR Suppliers will uphold the highest standards of integrity in all business interactions, including standards of fair business, advertising, and competition. Suppliers will avoid conflicts of interest and operate honestly and ethically throughout the supply chain and in accordance with applicable law, including those laws pertaining to anti-competitive business practices, respect for and protection of intellectual property, company and personal data, and export controls and economic sanctions. Suppliers will require that their employees avoid and disclose situations where their financial or other interests' conflict with job responsibilities, or situations giving any appearance of impropriety.

GRIEVANCE MECHANISMS AND NON-RETALIATION Suppliers will provide a clearly communicated grievance mechanism, in local languages, for workers to utilize to report integrity concerns, human rights concerns, safety issues, and misconduct without fear of reprisal. Subject to any restrictions imposed by law, suppliers will provide workers with a safe, confidential, and anonymous environment to provide grievance and feedback and will reasonably protect whistleblower confidentiality. Suppliers will prohibit all forms of retaliation against those who raise concerns in good faith. Suppliers will also appropriately investigate reports and take corrective action, if needed. Suppliers will cascade these expectations through their own supply chain. Reporting Concerns to Kett Subject to any restriction posed by law, suppliers will promptly inform Kett of any concern related to issues governed by this Code and collaborate with Kett in subsequent investigations. Kett policy prohibits retaliation against any person reporting such a concern. To report a concern, suppliers can always speak directly to their Kett representative. When potential adverse impacts are discovered, suppliers will investigate, and where appropriate, will engage with potentially affected stakeholders and/or their representatives with the aim of identifying mutually agreeable solutions or remedies and providing for or cooperating in their remediation through legitimate processes.

MANAGEMENT SYSTEMS Suppliers will develop and implement an appropriate internal management system to comply with applicable law and the content of this Code. Suppliers will be able to demonstrate compliance with this Code upon Kett's request and will take any action to correct any noncompliance. If requested, suppliers will complete questionnaires or participate in on-site assessment or audits. The management system should contain the following elements:

Leadership Commitment Suppliers will clearly identify senior executives and company representatives responsible for ensuring implementation of the management system and associated programs.

RISK ASSESSMENT AND MANAGEMENT Suppliers will have processes and strategies in place to identify and control business risk, legal compliance, environmental, health and safety, and labor practices and ethics risks associated with the supplier's operations. Suppliers should determine the relative significance for each risk and implement appropriate procedural and physical controls to control the identified risks and meet regulatory compliance. Suppliers will continually monitor and enforce these standards in their operations and supply chain including subcontractors.

IMPROVEMENT OBJECTIVES Suppliers should conduct a periodic self-assessment, preferably administered through a third party, regarding conformity to legal and regulatory requirements, the content of this Code, and customer contractual requirements related to social and environmental responsibility. Suppliers will also have a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

TRAINING Suppliers will have programs for new and ongoing training of managers and workers to implement their policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements and comply with this Code and Kett's policies.

COMMUNICATION AND DOCUMENTATION Suppliers will have a process for communicating clear and accurate information about their policies, practices, expectations, and performance to workers, suppliers, and customers. Suppliers will also create and maintain documents and records to meet regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

SUPPLIER RESPONSIBILITY Suppliers will have a process to communicate these Code requirements through their supply chain and to require suppliers to adopt management systems and practices for compliance with this Code. Upon request, suppliers will provide evidence of efforts to cascade this Code through their supply chains.