

SUPPLIER CODE OF CONDUCT

INTRODUCTION

Arclin is committed to ensuring that its employees, customers, communities, and the environment are treated with dignity and respect. Arclin is committed to maintaining the highest ethical standards of business conduct and compliance with all applicable law. Arclin expects its commitment to ethical business practices to be joined by all of its suppliers and sub-suppliers, its team, community, and other partners. Arclin requires that those companies who are approved as partners with Arclin will follow the same philosophy.

For these reasons, Arclin has established this Supplier Code of Conduct. Compliance with this Code is required of all suppliers, and is the responsibility of each individual supplier. Suppliers shall ensure that their employees and subcontractors comply with this Code when supporting Arclin. Suppliers must take reasonable measures to ensure that any supplies they source from act in accordance with this Code of Conduct as well. Failure to comply with this policy will be sufficient cause for Arclin to exercise its right to end its relationship with the supplier.

COMPLIANCE WITH APPLICABLE LAWS AND STANDARDS

All business activities of Arclin's suppliers must conform to all applicable national and local legal requirements, customs, and published industry standards pertaining to employment and manufacturing. If statutory requirements and published industry standards conflict, suppliers must, at a minimum, be in compliance with the one which, by law, takes precedence.

EMPLOYMENT PRACTICES

Human Rights:

Like Arclin, its suppliers must respect human dignity and human rights. Suppliers must maintain at all times a workplace free of discrimination, harassment, and abuse of any kind or nature. At all times employees shall be treated with respect and dignity.

Forced, Prison or Involuntary Labor is not Permitted:

All forms of forced labor, as defined by the International Labour Organization's 11 indicators of forced labor ([click here](#)), are prohibited. This includes the use of any form of forced labor and all forms of incarcerated labor. Arclin's suppliers shall not threaten workers with the use of physical punishment, confinement, threats of violence or other forms of physical, sexual, psychological or verbal harassment or abuse as a method of discipline or control. Arclin expects its suppliers to conduct human rights due diligence of their own suppliers and mitigate the risk of human trafficking and slavery in their supply chain.

Child Labor:

The use of child labor by suppliers is strictly prohibited and Arclin's suppliers are prohibited from using underage workers. An underage worker is any person under the minimum employment age according to the laws of the facility's jurisdiction, or, in the absence of law, under the minimum age for completing required education. Suppliers shall not employ anyone younger than 14-years-old, regardless of the country's minimum working age. Minors may only be employed to work and only be permitted to work during periods of time when they are not required by law to attend school except as may be permitted under

apprenticeship or other similar programs in which the minor is lawfully participating. Suppliers must have hiring practices that verify accurately age and ability to work legally.

Working Hours:

Suppliers must ensure that all employees supporting Arclin do so in compliance with all applicable national and local labor laws and with published industry standards pertaining to the number of hours and days worked. Employees will not be required to work more than the limits on regular and overtime hours allowed by local law. Adequate time off shall be at least one day off per week, and overtime must be voluntary.

Compensation:

Supplier employees must be fairly compensated and provided with wages and benefits that comply with applicable national and local laws. This includes appropriate compensation for overtime work and other premium pay situations required by applicable national and local laws. Suppliers shall clearly define on a regular basis their respective wages and other payments to employees and independent contractors. Suppliers will not use wage deductions as a disciplinary measure. All wages and other payments by Suppliers must meet applicable statutory provisions and/or mandatory local standards.

Harassment and Discrimination:

Suppliers shall be committed to provide a workplace free of harassment, including verbal, physical, or sexual harassment, and unlawful discrimination. Suppliers shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity, creed, national origin, legally protected leave or veteran status, ethnicity, disability, pregnancy, religion, political affiliation, union membership, medical condition, religious observances, or civil status in recruitment, hiring, and employment practices such as promotions, rewards, and access to training. Suppliers' employees must be able to bring reports of suspected harassment and discrimination without fear of retaliation.

No Undocumented Workers:

Suppliers shall only utilize workers who have a legal right to work.

Workplace Environment:

Suppliers must ensure that the workplace is safe, clean, and not harmful to the health of its employees and independent contractors, including workers with special requirements. Any working conditions at the workplace or on the Suppliers' premises that violate applicable law and/or regulation are prohibited. Suppliers shall provide their employees with safe and healthy working and, where provided, living conditions. At a minimum, potable drinking water, adequate, clean restrooms, adequate ventilation, fire exits and essential safety equipment, an emergency aid kit, access to emergency medical care, and appropriately-lit work stations must be provided. In addition, facilities be constructed and maintained in accordance with the standards set by applicable codes and ordinances.

Workplace Safety:

Suppliers shall train their employees on a regular basis regarding health and safety in the workplace, including fire evacuation drills involving all works on all shifts, at least once every 12 months, unless required more frequently by law. Suppliers shall provide workers with job-related, appropriately maintained and required personal protective equipment. Suppliers shall have a system for workers to report health and safety incidents and near-misses, as well as a system to investigate, track, and manage such reports.

Suppliers shall implement documented corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate workers' return to work.

Freedom of Association and Organization:

Suppliers shall not restrict the right of workers to freely associate with others, establish and join (or refrain from joining) workers' associations. Suppliers shall neither restrict the right to carry out collective negotiations in accordance with national laws and regulations nor discriminate against workers for exercising their rights and movement. In the absence of formal representation, Suppliers must ensure that workers have a mechanism to report grievances and that facilitates open communication between management and workers.

Reduction in Force:

If suppliers are required by economic circumstances to have a significant reduction in force, suppliers should apply with local applicable law. Where possible, and consistent with the law, suppliers should give affected employees at least 60 days advance written notice before the date of termination.

ENVIRONMENTAL PRACTICES

Environmental Protection:

Suppliers shall comply with applicable environmental and safety laws and regulations. This includes handling waste, chemicals, dangerous materials/substances, and effective control of wastewater discharges and air emissions. Suppliers shall train workers about proper handling of dangerous materials and substances and other environmental operational controls. Each Supplier shall obtain, keep current, and comply with all required business operating licenses and environmental permits and shall comply with the reporting requirements of applicable permits, law, and regulations.

Reducing Waste:

Suppliers shall, as practical, implement a systematic approach to reduce hazardous substances, non-hazardous waste, water use and wastewater, air emissions that pose a hazard to the environment, energy and natural resource consumption, hazardous substance consumption, and noise.

Conflict Minerals:

Suppliers shall disclose if they are providing Arclin with any "3TG" metals (tin, tantalum, tungsten or gold) that were sourced from the Democratic Republic of the Congo, Angola, Burundi, Central African Republic, Congo Republic, Rwanda, South Sudan, Tanzania, Uganda or Zambia.

ETHICAL PRACTICES

Anti-Corruption and Bribery:

Bribery, fraud, and other forms of corruption are strictly prohibited. Neither Arclin nor its suppliers, or any of their employees or representatives, directly or indirectly pay, promise to pay, or authorize the payment of money or anything of value to a government official or any other person in order to influence a decision or to secure any improper advantage. All applicable anti-corruption and anti-bribery laws including, but not limited to, the U.S. Foreign Corrupt Practices Act, must be complied with by all Arclin suppliers.

Competition and Fair Dealing:

All businesses, including Arclin benefit from fair competition in the market place. Arclin is committed to ensuring it and its suppliers operate on a level playing field. Arclin's suppliers shall not take any unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other illegal trade practice. Supplier shall not engage in price fixing, bid rigging, allocation of markets or customers, or similar illegal anti-competitive activities. Conflicts of interest are to be avoided.

Confidential Information:

Each supplier shall take reasonable steps to maintain the confidentiality of all proprietary and nonpublic information entrusted to it on behalf of Arclin. Supplier shall protect Arclin's confidential information against misuse or unauthorized disclosure with at least a reasonable degree of care. Supplier shall not use any of Arclin's confidential, proprietary, or nonpublic information for its own benefit or to Arclin's detriment.

Disclosure of information:

Information regarding supplier labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be accurately disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain is unacceptable and will be cause for termination of the business relationship with Arclin.

Data Privacy:

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

Trading:

Suppliers must comply with all valid and applicable laws when importing and exporting goods and services. Suppliers have the responsibility to ensure they comply with trade laws and regulations in any jurisdiction where they do business, including ensuring they are not partnering with entities and persons on the Office of Foreign Assets Control's sanctions list.

Reporting and Non-Retaliation:

Suppliers must provide their employees with a process to raise any legal or ethical concerns without fear of retaliation. All applicable anti-retaliation, reporting, and whistleblower laws must be complied with by Arclin suppliers.

Notification to Employees:

Suppliers shall notify employees of the terms of these standards and post the terms, on the supplier's letterhead, and in a prominent place accessible to all employees.

Effective January 2023