



September 20, 2023

Dear Supplier Partners,

St. Clair Technologies, Inc. strives to conduct its business with honesty and integrity, both within the group of companies under St. Clair Technologies, Inc. and in dealing with business partners, customers, suppliers, competitors, and the communities in which it operates. Our Code of Ethics and Business Conduct is a set of foundational principles that define such behavior. Our Sustainability Report outlines our commitment to social responsibility and the United Nations Sustainable Development Goals. We expect the same commitment to social responsibility and sustainable business management from our supplier partners, as outlined in the attached [Supplier Code of Conduct](#). Please acknowledge the receipt of this Supplier Code of Conduct. As a supplier to St. Clair Technologies, Inc., you are expected to comply with it and adopt an equivalent code of conduct throughout your supply chain.

Sincerely,

Carolynne Hunter, SCT President

Supplier Code of Conduct

St. Clair Technologies, Inc. commitment to ethical business conduct forms the basis for our conduct toward employees, customers, suppliers, competitors, and other stakeholders. The following Supplier Code of Conduct outlines the principles we follow internally as well as our expectations for all entities that provide goods or services to St. Clair Technologies.

We expect our suppliers to adhere these standards even in regions where such standards may not be considered part of the usual business culture.

HUMAN RIGHTS

Forced Labor, Child Labor and Human Trafficking

Suppliers must comply with all applicable laws and standards prohibiting all forms of forced labor, human trafficking, and child labor, including but not limited to:

- International Bill of Human Rights
- Fundamental conventions of the International Labor Organization (“ILO”): convention numbers 29 (and its 2014 protocol), 105, 138, and 182
- ILO Declaration on Fundamental Principles and Rights at work.
- Article 32 of the UN Convention on the Rights of the Child
- OECD Guidelines for Multinational Enterprises
- UNGC Guiding Principles on Business and Human Rights

Suppliers shall not employ workers below the local legal minimum employment age in the country or region of operations. In countries or regions where there is no local legal minimum employment age, suppliers shall not employ workers under 15 years of age. They must ensure that workers have access to their government issued identification, work related and travel documents. Workers must be allowed to resign their employment in accordance with local and national employment laws or regulations.

If a supplier uses a labor broker or third-party employment agency, the supplier will ensure the broker or agency employs ethical recruitment

practices, complies with applicable laws, and does not withhold identity documents.

Conditions of Employment

Suppliers must comply with applicable laws regulating work hours, wages, and benefits. They will respect the freedom of association, the right to form interest groups, and bargain collectively without fear of interference, discrimination, or retaliation as set out in ILO conventions 87 and 98. They must implement strict policies to foster an injury-free work environment. They must comply at least with the national standards for a safe and hygienic working environment. They must enable employees and other stakeholders to report concerns or potentially unlawful practices at the workplace.

Equal Opportunities

Suppliers will not discriminate on the basis of gender, color, race, national origin, religion, sexual orientation, age, veteran status, disability or gender identity. St. Clair Technologies, Inc. follows the Universal Declaration of Human Rights of the United Nations, support the UN Women's Empowerment Principles, adhere to ILO conventions 100 and 111, and encourage our business partners to advance equality and inclusion. Suppliers must treat all workers with respect and commit to a workplace that is free of harassment.

Responsible Materials Sourcing

Suppliers must exercise due diligence on the materials in their supply chains to reasonably ensure that their products do not directly or indirectly finance or benefit armed groups or contribute to serious human rights abuses, or severe health and safety risks and negative environmental impacts.

ENVIRONMENT

Responsible Stewardship

Suppliers will establish an environmental management system (See St. Clair Technologies, Inc. Supplier Handbook: Quality Requirements) to ensure a healthy living environment, identify the risks and environmental impact attached to their products during the production, distribution, and transportation process as well as the entire lifecycle and look for opportunities to reduce these. They will conserve resources and protect the communities and environment that surround them. They are expected to manage chemicals to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

Continuous Improvement

Suppliers will increase efficiency throughout their operations, including a reduction in raw materials, energy, emissions discharges, noise, waste and reliance on natural resources and hazardous substances by means of clear targets and improvement policies. They are expected to identify and eliminate the use of restricted substances in manufacturing processes and finished products.

Emergency Response

Suppliers strive to maintain policies and plans that mitigate exposure to terrorism, crime, threats, pandemics, natural disasters, and related major incidents. They must prepare reasonable and practicable emergency response plans that address the most likely anticipated emergencies and protect the safety of their employees and local communities. Contingency plans must be in place to maintain continuity of supply.

BUSINESS INTEGRITY

Ethical Behavior

Suppliers will avoid conflicts of interest and operate honestly and ethically throughout the supply chain and in accordance with applicable laws. They will value free and fair competition and comply with antitrust laws in all areas in which they operate. They will not collude with competitors, engage in price-fixing, market sharing and bid rigging, or exchange sensitive business data with competitors in an effort to restrict competition.

Anti-Corruption

Suppliers must uphold the highest standards of integrity in all business interactions.

They will not tolerate corruption, bribery, embezzlement, extortion, or fraud in any form. These principles also apply where suppliers engage third parties in connection with the activity for St. Clair Technologies, Inc.

Gifts and Entertainment

Suppliers and their representatives are not allowed to offer gifts in any form, including gift certificates, food certificates or rewards certificates to St. Clair Technologies, Inc. employees if it could give the appearance, if not the reality, of affecting the employee's judgement. Personal advantages, as well as benefits, from suppliers are also forbidden including the use of facilities or favors extended to St. Clair Technologies, Inc. employees' colleagues and/or their families. Suppliers may only offer discounts or other benefits that are also available to the general public or similarly situated company employees. Gifts of insignificant value such as items with logo of Company's name or trademarks, and normal and appropriate hospitality, may be offered for the purpose of promoting the company's image, presenting its products and services, and promoting good relations with business partners.

Trade Compliance and Export Controls

Suppliers will respect the applicable trade laws and restrictions as imposed by the United Nations or other national or supranational bodies or governments and have implemented strict policies to ensure compliance

therewith. They will comply with all applicable laws that prohibit business relationships with sanctioned countries, entities, or persons.

Protection of Intellectual Property

Suppliers must respect intellectual property rights and protect all confidential information provided by St. Clair Technologies, Inc. and its respective business partners.

Counterfeit Parts

Suppliers must establish effective processes to detect counterfeit parts and materials and, if detected, quarantine the materials, and notify the Original Equipment Manufacturer, customer, and/or law enforcement as appropriate.

Privacy

Suppliers are expected to refrain from using personal data for any purpose beyond the scope of the business arrangement. They shall implement appropriate measures to respect privacy and to protect personal data against loss and unauthorized access or use.

Information Security Practices

Suppliers must comply with all security laws of the locations where they operate. They must have clearly defined organizational information security roles, responsibilities, and accountabilities. They must publish and maintain formal written information security policies, protocols, and processes. They shall perform yearly information security awareness training for all their employees and shall regularly train others who have access to the Information Technology infrastructure or relevant information systems. St. Clair Technologies Inc. may require suppliers to perform self-assessments regarding their compliance with the standards and regulations for privacy and information security. St. Clair Technologies, Inc. may audit Supplier data security systems and may request supporting documentation

pertaining to the Supplier's Information Security Practices, to the extent permitted by law. They shall implement technical and organizational security measures to protect against any unauthorized or unlawful processing of all St. Clair Technologies, Inc. data held by suppliers and against accidental loss, destruction, alternation, disclosure, or damage to St. Clair Technologies, Inc. data. They must maintain policies and procedures to detect, monitor, document and respond to unauthorized information disclosures and encourage reporting of such incidents. They must notify St. Clair Technologies, Inc. Chief Information Officer of any breach of its information, or if that of a St. Clair Technologies, Inc. customer, partner or another supplier was disclosed. They shall maintain and annually test Business Continuity and Disaster Recovery plans.

Accurate Records

Suppliers shall accurately record, maintain, and report business documentation including, but not limited to, financial accounts, quality reports, time records, expense reports, and submissions to customers or regulatory authorities when appropriate.

Disclosure of Information

Suppliers shall disclose financial and non-financial information in accordance with applicable regulations and prevailing industry practices and, when applicable, disclose information regarding their labor force, health and safety practices, environmental practices, business activities, financial situation and performance.

Insider Trading

Suppliers must avoid the disclosure of any nonpublic information acquired about St. Clair Technologies, Inc. or another company's securities that could influence an investor's decision to buy or sell the security and should avoid insider trading by not buying or selling such securities when in possession of this information.

Anti-Money Laundering

Suppliers must comply with all applicable anti-money laundering laws throughout the world. St. Clair Technologies, Inc. will only conduct business with reputable suppliers who are involved with legitimate business activities and whose funds are derived from legitimate sources.

Compliance with this Supplier Code of Conduct

Suppliers shall promote compliance with this Supplier Code of Conduct among its suppliers and sub-suppliers. St. Clair Technologies, Inc. may audit the supplier's compliance with the code, including unannounced visits and inspections. In case of significant breaches, St. Clair Technologies, Inc. reserves the right to terminate the business relationship subject to applicable laws.

Reporting Concerns

Suppliers must provide an anonymous complaint mechanism for employees and stakeholders to report grievances. They must protect whistleblower confidentiality and prohibit retaliation. To report any violations to this code or any misconduct affecting St. Clair Technologies, Inc., suppliers may speak directly with their Supply Chain Services representative or report anonymously via email at compliance@stclairtech.com

Revision History:

Revision	Date	Description of Change(s)
A	4-15-2021	First Release