

# Innotec Supplier Code of Conduct



12-2023 Rev 1

# Introduction

*At Innotec, we believe the difference between being a good and a great company is more than just the ability to work harder than others. It's the values we demonstrate in our work – integrity, humility and trust.*

Innotec is committed to conducting its business in an ethical, legal, environmentally sustainable and socially responsible manner. The Supplier Code of Conduct covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it defines basic principles to guide Supplier business activities

This Code of Conduct applies to all businesses that provide products or services to Innotec. Innotec requires suppliers and their employees to commit to this Supplier Code of Conduct as a condition of doing business.

Suppliers must comply with the laws, rules, or regulations of the countries and locations in which they operate. In addition, Suppliers are expected to be familiar with the business activities of their suppliers and subcontractors and hold them accountable to the principles and requirements of this Supplier Code of Conduct. Innotec will discontinue its relationship with suppliers who fail to comply with this code.

If you are in a situation in which you believe an Innotec employee is in violation of this Code of Conduct, please follow the guidelines described in Reporting on Page 5.

# Environment

Innotec is committed to the application of our Vision and Values through environmental stewardship. Key to this commitment is continuous improvement of our environmental impact, complying with all environmental regulations, and developing processes that are safe for the environment. Innotec expects the same commitment from our Suppliers and expects you to conduct your operations in a way that minimizes the impact on natural resources and protects the environment, customers, and employees.

Innotec's Environmental Management systems are **ISO 14001** certified. We encourage all Suppliers to be working towards the implementation of this system within their organization. If not certified, Suppliers should still be ensuring their operations comply with all applicable laws related to air emissions, water discharge, toxic and hazardous substances, packaging, and waste disposal. Suppliers are expected to provide timely and appropriate reporting when requested by Innotec on prohibited or restricted substances. Innotec serves customers globally so our products must comply with regulations such as EU RoHS, EU REACH, CA Prop 65, CMRT, ERMT, etc.

International Material Data System (IMDS) provides substance breakdowns necessary to safely recycle vehicles at the end of their useful lives. When requested, Innotec requires all IMDS reporting to be submitted through the IMDS system for automotive program supporting Suppliers. Information can be accessed at <http://www.mdssystem.com> to observe the requirements of the IMDS Recommendation 001.

Innotec may request directly or use an outside, 3rd Party to gather compliance information from Suppliers. Suppliers are required to respond to such requests promptly. Non-compliance of any request could result in products being denied access to global markets, loss of contracts, and, in some cases, legal actions. Innotec will take a actions necessary to ensure products comply including canceling orders with Suppliers that do not meet requirements.

# Labor and Human Rights

Innotec is committed to fostering a culture where every employee feels valued, respected, and empowered to reach their full potential. Suppliers must ensure their employees are treated fairly and respectfully, regardless of background, identity, or position.

## **Child Labor**

Suppliers must not employ workers under the age of 15 and must comply with all labor organizations' regulations in the location where the goods are produced. If local law establishes a higher minimum age, Suppliers must comply accordingly.

## **Compensation and Working Hours**

Suppliers must comply with all applicable prevailing local wage and working hours regulations. Workers must be compensated at a rate at least equal to the prevailing local minimum wages, including piece rate workers.

## **Hiring and Employment Practices**

Suppliers' hiring practices must include verification of workers' legal right to work in the country and ensure all mandatory documents are available. Suppliers must prohibit discrimination based on race, color, religion, sex, age, national origin, height, weight, marital status, genetics, veteran status, or disability in accordance with all applicable federal, state, and local laws and ordinances.

## **Forced Labor**

Every Supplier employee must be a voluntary worker. Employees cannot be made to work against their will. Suppliers are prohibited from engaging in practices that constitute modern slavery, such as human trafficking; using forced, involuntary, or slave labor; or purchasing materials or services from entities that use forced, involuntary, or slave labor. Suppliers must be able to certify that materials used in the products sold to Innotec comply with labor and modern slavery laws of the countries in which they do business.

## **Conflict Minerals - CMRT**

Suppliers are expected to comply with Innotec's Conflict Mineral Policy. Suppliers must promptly provide all reporting documents requested by Innotec to support this regulation.

## **Extended Minerals**

Suppliers may also be required to submit EMRT reporting templates to mitigate risk in the cobalt and mica extended supply chains.

## **Supplier Diversity**

Suppliers are expected to support diversity, equity, inclusion, and equal opportunity in their workplaces. Suppliers are also encouraged to adopt a supplier diversity sourcing program with goals to source small and/or disadvantaged business enterprises.

## **Harassment**

Suppliers must treat all workers with respect and dignity. They may not subject workers to corporal punishment, physical, sexual psychological or verbal harassment, or abuse. Suppliers must provide an environment that allows employees to raise concerns without fear of retaliation and the ability to report anonymously if allowed by law.

## **Health and Safety**

Suppliers must provide workers and visitors with a safe and healthy work environment. Suppliers will take proactive prevention to minimize health risk exposure. Suppliers must ensure their operations comply with all laws related to health and occupational safety.

# ETHICS

TRUST is the foundation of all our relationships. Tell the unvarnished truth. Share information. Honor commitments. The customer should be able to give us their checkbook and know we would manage it profitably for us both.

## **Global Trade Compliance**

Suppliers must comply with applicable sanctions, export control and import laws and regulations. Suppliers must not provide Innotec with supplies or services from embargoed or sanctioned countries. Suppliers shall respond in a timely manner to all information requests related to country of origin and free trade agreements.

## **Gifts and Gratuities**

No gifts or entertainment should ever be offered, given, provided to any Innotec employee, or relative of an employee unless it's: (1) is nominal in value, (2) cannot be construed as a bribe or payoff, and (3) does not violate any laws, rules, or regulations to ensure fair and impartial business relationships.

The purpose of business entertainment and nominal gifts is to create goodwill and sound working relationships, not to gain unfair advantage or affect business decisions.

## **Conflicts of Interest**

Suppliers are expected to avoid any situation where a conflict of interest exists or the appearance of a conflict exists that may potentially interfere in any way with the interests of Innotec or the Supplier. Examples include: A conflict of interest situation can arise when a Supplier has interests that may make it difficult to perform his or her company work objectively and effectively. Transactions between Innotec and Suppliers in which an employee or their relatives have an interest, employment of relatives, and similar situations may give rise to conflicts of interest.

The best policy is for Suppliers to avoid any direct or indirect business connection with Innotec's customers, or competitors, except on Innotec's behalf. Actual or potential conflict of interest should be disclosed immediately to the Innotec Purchasing Director. If you have a question or concerns, you should consult with Innotec Purchasing.

## **Confidentiality**

Control of confidential and personal information is critical to the success of both Innotec, its Customers, and its Suppliers.

All Suppliers are expected to maintain and protect the confidential information entrusted to them by Innotec and/or its customers, as required by Innotec policy, applicable laws, rules, or regulations. Confidential information includes all nonpublic information that might be of use to competitors, and harmful to Innotec or its customers if disclosed. It also includes information that customers have entrusted to us through the use of Nondisclosure Agreements. The obligation to preserve confidential information in accordance with Innotec policy and practice continues even after a relationship with a Supplier ends.



# Reporting

**Suppliers** must know that their welfare and growth are critical to us. Tell the unvarnished truth. Share information. Working together, we can create a positive work environment for all.

## **Supplier Transparency**

Transparency is required to confirm compliance with this Code of Conduct. If there is a known and validated concern impacting Innotec's business, Innotec may request documents, conduct onsite audits, and/or require corrective action. This includes compliance with Innotec's restrictive substance and conflict minerals requests.

## **Communication**

Suppliers are expected to communicate this Supplier Code of Conduct to their employees and extended supply chain and hold them accountable for compliance.

## **Reporting**

Suppliers may direct questions or comments on this code of conduct to their Purchasing contact or the Purchasing Director at [purchasing@innotecgroup.com](mailto:purchasing@innotecgroup.com).

In addition, any unethical behavior by an Innotec employee or evidence of behavior that conflicts with the Supplier Code of Conduct (or Innotec's Code of Conduct found on our website) may be reported confidentially to an Innotec leader at [people.team@innotecgroup.com](mailto:people.team@innotecgroup.com).

