



**UNITED INITIATORS**  
*driving your success*

Working  
Safely



## SUPPLIER CODE OF CONDUCT

Making the Right Way Our Way!

# DRIVING YOUR SUCCESS

United Initiators is committed to long-term sustainable development in its business operations by focusing on environmental protection, social responsibility, ethical behavior and economic success. United Initiators expects the same commitment to internationally recognized environmental, social and corporate governance standards from its suppliers in the value chain. This Supplier Code of Conduct (“Code”) sets forth the basic principles for supplier conduct globally. By entering into a business relationship with United Initiators, suppliers accept and agree to fully comply with this Code. Suppliers shall also ensure compliance throughout the value chain.

## **Environment, Health and Safety – Protecting the Planet**

- Suppliers shall comply with all applicable environment, health and safety laws and regulations. Suppliers shall maintain all legally required permits, licenses, approvals and other certifications for the manufacturing, selling and transportation of their products.
- Suppliers shall ensure the protection of the health and safety of their employees and the local neighborhoods surrounding their sites, as well as protecting the public in general against hazards inherent in their processes and products.
- Suppliers shall maintain management systems to ensure product quality and safety are in compliance with all requirements.
- Suppliers shall continuously evaluate and improve their products, working methods, production processes and services to prevent, mitigate and control environmental, health and safety effects resulting from their operations. Suppliers shall minimize the environmental effects of their operations by applying energy-efficient and environmentally friendly technologies and reducing waste, as well as emissions to air, water, and soil.
- Suppliers shall comply with all applicable transportation laws and regulations and shall have systems in place to ensure safe and secure handling and transportation of products.

## **Social – Protecting People**

- Suppliers shall treat their employees fairly, with dignity and respect, and in accordance with fundamental human rights. They shall maintain an environment free of discrimination, abuse, unlawful practices, and harassment.
- Suppliers shall not tolerate, or benefit from, any forms of forced or involuntary labor, including compelled overtime, debt bondage, forced prison labor, modern slavery or human trafficking.
- Suppliers shall not discriminate in hiring and employment practices on the grounds of race, color, gender, religion or philosophy, national origin, disability, age, trade union membership, sexual orientation, military status, genetic information, marital status and gender identification or other characteristics as and where protected by applicable laws.
- Suppliers shall comply with all applicable child labor laws and shall not use, or support any use of, child labor or other child exploitations.

- Suppliers shall respect their employees' freedom of association and the right to collective bargaining in accordance with applicable laws and regulations without fear of reprisals.
- Suppliers shall comply with all local working hour and wage laws and ensure that their employees are paid a fair wage sufficient to cover their minimum local living standards.
- Suppliers shall abide by all applicable laws and regulations related to conflict minerals (tin, tantalum, tungsten, and gold) and the sourcing thereof. Suppliers shall have systems in place to conduct the necessary due diligence to trace such minerals back to their origin, and upon request, provide evidence of accuracy and validity of the sourcing of the conflict minerals.

### **Governance – Protecting Ethical & Legal Practices**

- Suppliers shall comply with all applicable laws and regulations related to fair and ethical business practices, including requirements relating to anti-corruption, anti-competitive practices and prevention of criminal tax evasions.
- Suppliers shall prohibit all types of bribery, whether direct or indirect, corruption and money laundering in business or government relationships. Accurate and properly maintained records of all matters related to supplier's business with United Initiators shall be kept and provided to United Initiators upon request.
- Suppliers shall comply with all applicable trade control regulations and laws, embargoes, sanctions lists and other restrictions governing international trade. Suppliers shall have strict policies in place to ensure compliance with all applicable regulations within their supply chains and shall provide United Initiators with any documentation necessary for its compliance with all export/import laws.
- Suppliers shall avoid any conflicts of interest, which include offering payment or employment opportunities to employees of United Initiators and shall disclose and manage any such conflicts.
- Suppliers shall protect all confidential information provided by United Initiators and its respective business partners and shall comply with all applicable data privacy laws. Suppliers shall take all due care in handling, discussing, or transmitting sensitive or confidential information that is disclosed by United Initiators.
- No confidential information shall be used to engage in or support insider trading.

### **Compliance and Monitoring**

The principles in this Code apply to all United Initiators suppliers worldwide and are minimum requirements. Suppliers must always comply with applicable international and national laws, regulations and conventions. If applicable international and national laws, regulations, and conventions are stricter than this Code, they shall prevail.

United Initiators reserves the right to conduct audits or assessments to ensure supplier's compliance with this Code. United Initiators, and any third party appointed by United Initiators, shall have the right to access all sites of the suppliers to perform such audits.

Any non-compliance with this Code, as well as any concerns about illegal behavior or improper conduct, should be reported to supplier's contact person at United Initiators or may also be reported as set forth in the United Initiators Code of Conduct at <https://www.united-initiators.com/company/united-initiators-code-conduct>.



United Initiators reserves the right to discontinue any business relationship with any supplier who has, directly or indirectly, breached this Code, violated any applicable laws or regulations and failed to correct any such breaches or violations.



# UNITED INITIATORS

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