



PLEASE SIGN AND RETURN ACKNOWLEDGING YOUR RECEIPT AND REVIEW OF HUYETT'S SUPPLIER CODE OF CONDUCT

To All Huyett Suppliers,

Huyett is a privately held family-owned business with a significant Culture of Excellence. The family shareholders drive a value system through management and employees centered on Huyett's purpose - *"To acquire customers and make the world a better place."* Being privately held, this purpose can be pursued unencumbered by a short term financial-oriented viewpoint. Our long-term purpose-driven viewpoint inspires us to not only write a Supplier Code of Conduct, but to embrace the code as our way of life with respect to our trading partners. The Culture of Excellence is in stark contrast to the Culture of Comfort that is prevalent in society. The Culture of Excellence requires sacrifice, effort, action, and commitment.

As a supplier or potential supplier to Huyett, you gain the benefit of a customer that pays its bills, is respectful and thankful to you, and who helps you win new business. It is important and vital to our professional relationship that you embrace our Code of Conduct. Even better, embracing this Code of Conduct will result in your firm making the world a better place. We are compelled from human nature to audit and verify your compliance. If we find that you intentionally or carelessly violate our Code of Conduct, you will have violated our trust, and trust is the very basic foundation of a relationship. Our relationship will be impaired, and if the pattern continues, we shall cease the trading partnership.

That being said, we understand no supply chain is perfect and issues will arise, even with the best of intentions. Our goal is to establish an equal, working partnership to address any concerns embedded in this Code of Conduct. We hope to encourage honest communication when those issues arise and foster an environment of active prevention, mitigation, and remediation of any violations. Please join us in making the world a better place.

Timothy O'Keeffe, CEO

## The Huyett Commitment

Huyett is committed to making the world a better place. We believe this is possible when people work together and commit to the highest ethical standards of labor, human rights, environmental, and business conduct.

In accordance with this belief, Huyett has enacted a Supplier Code of Conduct ("the Code") to ensure our business partners share and uphold our standards. We require our Suppliers to operate within the principles and requirements, as applicable, in the Code and in full compliance with all applicable laws and regulations.



## Scope

Huyett expects the Supplier to uphold the Code. We also expect the Supplier to extend enforcement of the Code to any subsidiaries and affiliates, as well as any subcontractors and sub-tier suppliers, providing goods/services to Huyett or for use in/with Huyett products.

## Practical Application

Huyett acknowledges that the application of these expectations must occur within reason, depending on resources, regional support, and other factors. We encourage Suppliers to use practical judgement, responsible behavior, and compassion when complying with the Code. We also encourage Suppliers to evaluate current resources and allocate them logically, depending on severity of potential risks or known Code violations.

Huyett reserves the right to assess its suppliers' compliance with this Code. Any violations of this Code may jeopardize a supplier's business relationship with Huyett up to and including ending the partnership.

That being said, no supply chain operates free and clear of human rights, environmental, or business violations. Huyett expects Suppliers to honestly evaluate risks and communicate Code violations to appropriate authorities, as we will do the same in our business. This is a cooperative endeavor, and we will work with Suppliers who are genuinely working to establish an ethical supply chain and responsible business behavior.

## Supplier Expectations

Huyett expects Suppliers to enforce the following Code expectations.

### Foundational Compliance

Suppliers shall, at minimum:

- Comply with any and all laws and regulations that apply to all commitments within the Code.
- Maintain proper legal documentation on all applicable components of the Code and consider documentation systems to supplement voluntary continuous improvement efforts.
- Approach Code compliance, business practices, and general conduct with a genuine ethical intent to convey and practice moral behavior.
- Respect the cultural differences of all Stakeholders when implementing the Code or correcting violations.

### Human Rights Commitment

Suppliers shall, at minimum:

- Uphold the human rights enshrined in the Universal Declaration of Human Rights in the workplace and throughout their entire supply chain.
- Uphold the higher standard of obligation when applicable human rights' laws and regulations differ. In the event of a contradiction, Suppliers shall uphold the letter of the applicable law while honoring the higher standard.



- Avoid causing human rights abuses and commit reasonable support to mitigate human rights abuses in their supply chain, even if they are not directly responsible.

## Safe, Fair, and Ethical Labor Commitment

Suppliers shall, at minimum:

- Provide/maintain a safe work environment and integrate health/safety management practices into its business. Workers shall have the right to refuse working in unsafe conditions and to report such conditions to a trusted, anonymous, and accessible reporting mechanism.
- Develop, implement, train for, and maintain an emergency response plan for appropriate emergency situations the Supplier may face. Examples include:
  - Fire
  - Earthquake
  - Tornado
  - Active shooter
  - Chemical spills
  - Serious workplace injuries
- Pay at least the minimum wage, provide any benefits required by law and/or contract, and compensate workers for overtime hours at the legal premium rate.
- Clearly communicate pay structure and pay periods to all workers.
- Meet all legal requirements relating to wages and benefits, pay accurate wages in a timely manner, and shall refrain from withholding wages as punishment.
- Restrict workweeks to that defined in applicable laws and regulations and grant at least a 24-hour consecutive period of rest every seven days.
- Ensure that all work is voluntary and does not include any form of slave, forced, bonded, indentured, or prison labor. Workers must reserve the right to walk away from a job without fear of punishment, retaliation, or harm.
  - This must be especially upheld concerning the worst forms of child labor, as outlined in the ILO Worst Forms of Child Labor Convention no. 182. *Child labor of any form is not voluntary and must be eradicated.*
- Not employ underage labor as defined by applicable law (under the age of regional minimum employment age) and – when in conflict or doubt – comply with the ILO Minimum Age Convention no. 138.
- Not participate in or allow any form of human trafficking within their workplace or supply chain. Human trafficking is generally defined in U.S. and international law as:
  - The Act: Recruitment, harboring, transporting, providing, or obtaining of persons *for*;
  - The Means: Use of force, fraud, coercion, threats, manipulation, debt bondage, use of substances, government ID document theft, etc. *to*;
  - The Purpose: Secure forced services of any kind for the purpose of exploitation
- Ensure – as reasonable measures to prevent human trafficking – the following:
  - Workers' are in full control of their original government ID and applicable documents at all times. Documents should never be withheld from their owner for any reason, including during their employment or relevant travel.
  - Contracts, employment conditions, instructions, and rights at work are conveyed to each worker in a language they understand, which may require interpretation services.



- Workers' movements, living conditions, social lives, and transportation are not restricted, monitored, or controlled.
- Recruitment fees are not imposed on workers.
- These requirements are extended to contracted, third-party, temporary, and migrant workers.
- Refrain from discriminating against any person on age (adhering to minimum legal working age laws), disability (barring role-specific physical demand requirements), ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by applicable national or local law.
- Freely allow workers' lawful rights to associate with others, form and join (or refrain from joining) organizations of their choice, and bargain collectively without interference, discrimination, retaliation, or harassment.
- Commit to a workplace free of harassment and abuse and not threaten workers with, subject them to, or condone in any form the following (included but not limited to):
  - Verbal abuse and harassment
  - Psychological harassment
  - Sexual harassment
  - Mental and physical coercion
  - Physical and sexual abuse
- Ensure that all third-party employment agencies the Supplier uses are compliant with the Code's provisions.

## **Environmental Commitment**

Suppliers shall, at minimum:

- Develop, implement, and maintain business practices that preserve and protect the environments they interact with, conserve natural resources, limit waste, and reduce pollution.
- Consider developmental business plans within the context of sustaining long-term environmental and economic preservation.
- Acknowledge the responsibility they have to environmentally vulnerable countries for respecting and protecting their resources that contribute to the Supplier's goods and services.
- Identify, manage, reasonably reduce, and responsibly control the following:
  - Energy use
  - Water use
  - Hazardous air emissions
  - Solid and chemical waste
  - Hazardous materials
- Comply with all relevant laws and regulations regarding (including but not limited to):
  - Environmental protection
  - Pollution
  - Air emissions
  - Water management
  - Hazardous solid or chemical substances
  - Material restrictions
- Obtain, keep current, and comply with all required environmental and material permits, documents, and certifications (Ex.: RoHS, REACH, Prop. 65, etc.) and comply with all associated reporting requirements.



## Responsible Sourcing

Suppliers shall, at minimum:

- Comply with any applicable laws concerning the sourcing of all materials - including conflict minerals - including any reporting and due diligence mechanisms outlined in such laws.

## Business Ethics

Suppliers shall, at minimum:

- Uphold the highest standard of ethical conduct in every aspect of business, including relationships, practices, sourcing, operations, and transparency.
- Abide by all applicable antitrust laws and the ethical principles on which they are founded.
- Abide by all applicable anticorruption and bribery laws and the ethical principles on which they are founded (including the bribery of nonpublic Stakeholders).
- Accurately and honestly account for all financial transactions, which should represent fair and lawful financial behavior.
- Respect the confidentiality of all Stakeholders' sensitive data/information and refrain from sharing such information with anyone who does not have the explicit right to access it.
- Respect and safeguard all Stakeholders' intellectual property rights and manage technology in a manner that preserves those rights.
- Accurately record information regarding its business activities, labor, health/safety, and environmental practices and shall disclose such information, without falsification or misrepresentation, to all appropriate parties as required by law.
- Observe all import/export laws and trade restrictions and will specifically comply with C-TPAT (Customs-trade Partnership Against Terrorism) security procedures.

## Code Management

Suppliers shall, at minimum:

- Create, promote, and maintain a whistle-blowing policy in which any employee can safely submit (including but not limited to) code violations, safety concerns, and suspicious behavior without fear of retaliation or unnecessary exposure.
- Develop, implement, and maintain an incident management system that appropriately documents and responds to incidents like:
  - Whistle-blowing submissions
  - Safety violations/injuries
  - Emergency situations
- Develop and initiate corrective action plans that respond to Code violations. These plans should consider:
  - Legal obligations
  - Moral intent to provide remedy to potential victims first
  - Respect for safety and privacy of potential victims
  - Awareness that corrective action should not impose further human rights abuses
  - Intent to preserve the environment for sustainable long-term and future development
  - Alignment with principles outlined in the Code
- Submit to planned audits and assessments – from internal/independent sources or Huyett – to evaluate Code compliance. Unplanned visits may occur on a situational basis in response to a suspected/known violation.



## Above and Beyond

Suppliers are encouraged to:

- Continually evaluate and improve upon all commitments within the Code in a timely manner and with a genuine intent to uphold human rights, protect the environment, and engage in moral business practices. Additional practices may include:
  - Voluntary audits/assessments
  - KPI setting
  - Human/workplace rights training
  - Environmental initiatives
  - Outreach to local human rights, emergency response, legal, environmental, or social services to form multidisciplinary teams to respond to concerns
- Establish a similar code with supply chain entities that are outside the scope of this Code, with specific attention paid to entities in vulnerable/unstable regions.
- Consider opportunities to directly engage with the local community and encourage employees to contribute to projects, initiatives, and populations in need.

## Code Violations

Suppliers shall:

- Report Code violations within their business through the designated whistle-blowing policy.
- Report Code violations observed in supply chain entities through their whistle-blowing policy, appropriate leadership, or – when warranted – local law enforcement.

Huyett seeks suppliers who are honorable and share corporate principles that value human life, the environment, and employees and their families. This Code seeks to clarify those principles for implementation across cultures, countries, and behavioral norms.

Huyett expects its suppliers to self-report practices or incidents that are not compliant to this Code. Should Huyett discover a lack of compliance through its own investigative efforts versus a supplier self-reporting, the harm to the relationship and future potential business between Huyett and the supplier will be significantly impacted.

## Support Documents

Huyett refers to the guidance and principles outlined in the following documents to confirm our expectations, structure the Code, and align with the current global consensus of what similar codes should convey. Other resources that align with these foundational documents are referenced throughout the Code.

We have listed these supporting documents for educational purposes and further reading.

- [Universal Declaration of Human Rights](#)
  - 1948 declaration recognizing the inherent dignity and equal rights of humanity – one of the foundational documents supporting the UN Global Compact





- [UN Global Compact 10 Principles](#)
  - 2000 voluntary initiative derived from foundational UN/ILO documents to align companies' efforts concerning human rights, labor, the environment, and anti-corruption
- [UN Guiding Principles \(UNGP\)](#)
  - 2011 guiding, non-binding document identifying State and Corporate responsibilities in recognizing and upholding human rights
- [ILO Declaration on Fundamental Principles and Rights at Work](#)
  - 1998 document expressing State and Corporate commitment to economic growth through social justice and sustainability – one of the foundational documents supporting the UN Global Compact
- [Rio Declaration on Environment and Development](#)
  - 1992 UN declaration aiming to establish global partnerships committed to economic growth through environmental and developmental sustainability – one of the foundational documents supporting the UN Global Compact
- [OECD Guidelines for Multinational Enterprises](#)
  - 2011 (updated version) non-binding set of recommendations/principles for responsible business conduct with international State and Corporate support – designed for MNEs, but principles are applicable to companies of all sizes
- [OECD Due Diligence Guidance for Responsible Business Conduct](#)
  - 2018 support document providing practical implementation methods for the recommendations/principles outlined in the 2011 Guidelines for MNEs

*\*In accordance with the UNGP framework, where national law and international human rights standards differ, we follow the higher standard. Where they are in conflict, we respect national law, while seeking to respect the principles of internationally recognized human rights. In addition, where national law and Huyett's strict environmental, health and safety standards differ, we follow the higher standard. Where national law and Huyett's high standards are in conflict, we respect national law while seeking to honor the higher standard.*

## Huyett Contact Information

Huyett will always discuss Code matters with the Supplier. These conversations will be open, honest, equal, and guided by the intent to cooperate and find solutions. Please contact Huyett with any questions – they will be directed to our Supply Chain Manager and our Quality Manager.

- **Phone:** (785) 392 – 3017
- **Email:** [purchasing@huyett.com](mailto:purchasing@huyett.com)

Supplier Signature:

Date: