



Supplier Code of Business Conduct

2022

At ACS, we work hard to meet and exceed our customers expectations. ACS looks to be a leader in our respective business thru continuous improvement, innovation, and to taking care of our people and the communities where we carryout out business. We accomplish, in part, through our supplier partnerships who share our commitment to customer service, quality, innovation, and focus on integrity, compliance and doing the right thing for our customers, people and communities.

ACS is rolled out our Supplier Code of Conduct in 2021 and looking forward to your participation. We realize that the legal and cultural requirements differ across different countries, but we expect our supplier partners to follow the applicable laws of their respective country or territory. ACS, also expect our supplier partners to follow a universal code of conduct that applies everywhere.

The goal our supplier code of Conduct is to provide you with the guidelines to allow you to be successful in doing business with ACS and our global customers. This supplier code will be part of our on-going supplier evaluation and may provide additional terms for your contracting with ACS Industries.

Thank you

Chris Granato

Vice President of Procurement & Supply chain

ACS Industries Inc.



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Obey The Laws In All Locations

ACS is a global company that operates in multiple countries that makes for a complex legal situation. However, our principle is clear: We will obey the law in all our locations. Our principle also extends to our suppliers, and we are now requiring our suppliers to comply with the laws of their countries and with all other applicable laws, and regulations. Often times, our suppliers must also comply with certain laws of the United States even if they are located in another country. While there are many laws and regulations that companies must follow, some examples of important areas of legal compliance include:

- 1) Bribery / Anti-Corruption
- 2) Export Control Laws - for products, services, and technical data
- 3) Fair Competition Laws
- 4) Conflict Free Sourcing – track and minimize the use of Conflict minerals

For Compliance, the following are the key requirements

- 1) Be aware of all laws and potential changes that impact operations
- 2) Provide information with respect to conflict mineral sourcing
- 3) Ensure all employees are aware of the laws, provide training and ensure corrective actions are taken when compliance issues occur
- 4) Refer to the ISO37001 guidelines for guidance on Anti Bribery Management systems
- 5) Review US Export control Laws per the US International Trade Association



Avoid Conflicts of Interest

Suppliers must do business in an open and transparent manner with the highest integrity. There is the potential for a “conflict of interest” if a supplier’s employee or his or her family member has a close relationship with an ACS employee who can make decisions that will affect the supplier’s business. For that reason, the supplier must notify ACS of these types of relationships to ACS before entering into negotiations and whenever they arise. Suppliers should have policies regarding conflicts arising from personal relationships and the giving and receiving of gifts and other business courtesies.

For Compliance, the following are the key requirements:

- 1) Promptly notify ACS of any of these types of relationships
- 2) Notify ACS if one of our employees requests a business courtesy of any kind
- 3) Provide documented proof of training for employees



Treat People With Dignity & Respect

ACS is in alignment with internationally recognized human rights and we strive to ensure we comply with all applicable laws regarding the treatment of our employees and other stakeholders. We recommend that our suppliers also uphold these important principles and we are committed to working with all suppliers who undertake similar assessments of their own business and develop their own approach to respecting human rights.

Our key areas of focus are:

- 1) No Forced or Child Labor
- 2) Wages & Hours in compliance with local requirements
- 3) Diversity & Inclusion

For Compliance, the following are the key requirements:

- 1) Maintain payroll records of wages, bonuses, over time pay and hours worked
- 2) Official documentation for all of your workers in terms of hire date, date of birth, employment history, and training history



Provide a Safe & Healthy Workplace

A safe and healthy working environment is a critical component of an effective partnership between ACS and our partners. Suppliers must comply with all applicable local laws regarding working conditions. This includes worker health and safety, hygiene, sanitation, fire safety, risk protection and electrical, mechanical and structural safety. It is ACS goal to partner with all suppliers in efforts to meet the commitment to the safety and well-being of our employees.

Key areas of Focus

- 1) Workplace General Safety
- 2) Machine Safety
- 3) Material Handling Safety
- 4) Employee General Safety

For Compliance, the following are the key requirements:

- 1) Know and comply with all local health and safety requirements
- 2) Provide training for all employees, contractors, and others for health and safety systems and guidelines
- 3) Be able to provide documentation of proof upon an audit



Take Care of The Environment and Do Your Best to Conserve Natural Resources

As we expand our business globally, it is our responsibility becomes more important to ensure our actions around the world reflect our commitment to the environment and our planets natural resources. We expect our suppliers and their subcontractors to comply with all applicable environmental laws, regulations, and standards. It is important that suppliers manage compliance, and minimize their environmental impact. Suppliers should maintain documentation to be able to respond to requests for information such as source consumption, emissions, compliance, environmental risks and liabilities and other environmental sustainability metrics. Suppliers should have procedures for notifying community authorities in case of an accidental discharge or release of hazardous materials into the environment, or in case of any other environmental emergency. Suppliers should implement an audit program for compliance to applicable environmental regulations and standards, including a means to ensure corrective actions and avoidance of recurrence.

For Compliance, the following are the key requirements:

- 1) Know and adhere to all local environmental laws and regulations
- 2) Formal program of continuance improvement reducing the carbon footprint, and other negative impacts (water, air, and land) on the environment
- 3) Documentation of training and awareness of the two points above



Protect Intellectual Property

ACS Industries technology, experience and knowledge give our company a competitive advantage in the marketplace. We must maintain this advantage by working with our suppliers to protect our propriety information and intellectual property. All of our suppliers are responsible for protecting our confidential information and intellectual property. ACS and our suppliers together must maintain physical and electronic security for all sensitive information. Our employees as well as each supplier's employees should use care in protecting all types of sensitive information. Information should not be stored in unauthorized locations, such as personal email servers or an employee's private electronic devices. If sensitive information is to be discussed or exchanged between ACS and a supplier, or a supplier and a third party, the parties must first ensure that a Confidentiality or Non-Disclosure Agreement has been shared and signed.

Key areas of Focus

- 1) Intellectual Property
- 2) Anti-Counterfeit
- 3) Personal Data Privacy

For Compliance, the following are the key requirements:

- 1) Do not download ACS confidential information without permission
- 2) Never store ACS confidential information on any flash or thumb drives
- 3) Do not use ACS brands without written permission
- 4) If employee leaves supplier company, access to ACS systems (portals, FTP sites, etc..) must be discontinued



Conclusion

A Code of Conduct policy is only as effective as the efforts to enforce it. ACS expects its suppliers to comply with the conditions of the Supplier Code of Conduct and maintain a system to monitor compliance. Suppliers must take the necessary steps to ensure that its employees understand and comply with the Code, including communicating the details of the Code to employees annually in the local language of the business. Suppliers must ensure that its suppliers and subcontractors who work with ACS products and information aware of and comply with this Code of Conduct. ACS may visit supplier facilities, review supplier documentation and conduct a full audit if necessary to ensure compliance with this Code. If ACS determines that a supplier has violated this Code, the supplier must provide information relating to the incident(s) and show within 60 days the corrective actions taken. ACS may follow up with supplier to make sure the issue has been corrected.