

## **SUPPLIER CODE OF CONDUCT**

The Cleveland Electric Laboratories Company (“CEL”) Supplier Code of Conduct explains how we expect suppliers, manufacturers, and other business partners (each a “Supplier Partner”) to work with CEL ethically and in compliance with applicable laws. This Supplier Code of Conduct is incorporated, by reference, into all supplier contracts.

1. **OBEY THE LAW.** As a responsible company, we expect our global Supplier Partners to share our commitment to following the law.

We expect our Supplier Partners to: know and follow the laws that apply to them and their business; treat legal requirements as a minimum standard; and, alert CEL to any material issues with the goods and services they supply – especially health and safety issues.

2. **CONDUCT BUSINESS WITH INTEGRITY.** We seek business relationships based on trust, transparency, and mutual accountability.

We expect our Supplier Partners to: compete fairly and ethically for CEL’s business; never offer or accept bribes, kickbacks, inappropriate gifts or hospitality, or other improper incentives in connection with CEL’s business; avoid any conflict of interest relating to financial interests or other arrangements with our employees that may be considered inappropriate; and, work with their own suppliers to promote business conduct consistent with the principles in this Supplier Code of Conduct and in compliance with applicable laws.

3. **KEEP ACCURATE AND HONEST RECORDS.** We expect our Supplier Partners to maintain accurate and honest records. This helps us make responsible business decisions and disclose truthful and timely information to our stakeholders.

We expect our Supplier Partners to: maintain books and records that reflect all transactions in an accurate, honest, and timely way; employ appropriate quality audit and compliance processes for matters such as worker health and safety, and labor and employment; and, on request, the location of facilities and known origins of materials to enable traceability.

4. **HONOR BUSINESS OBLIGATIONS.** We work with Supplier Partners who share our desire to build productive business relationships. This requires honest communications, mutual respect, and delivering on commitments.

We expect our Supplier Partners to: share our commitment to conducting business honestly and transparently; and, honor business obligations and manage unanticipated events in a proactive, timely, and open way.

5. **MATERIAL COMPLIANCE AND CONFLICT MINERALS.** We are determined to comply with regulatory and customer requirements regarding the prohibition and restriction of substances, including hazardous substances and conflict minerals. Therefore, suppliers shall ensure that the goods provided to CEL are in compliance with requirements covered under the scope of all relevant regulations.

We expect our Supplier Partner to: implement a policy regarding conflict minerals and exercise due diligence to investigate the source of these minerals; and, respond in a timely manner to CEL’ requests for evidence of your compliance with these requirements.

6. **TREAT PEOPLE WITH DIGNITY AND RESPECT.** We expect our Supplier Partners to prioritize the safety, well-being, human rights, and dignity of all individuals whose talents and hard work help us deliver our products and services.

We expect our Supplier Partners to: conduct their business activities in a manner that protects the health and safety of those whose lives they touch; respect the right of workers to form or join a legally recognized labor organization, if they choose, without fear of reprisal, intimidation, or harassment; treat all workers with dignity and respect, and provide an emotionally and psychologically safe and inclusive working environment; Provide competitive, fair, and equitable pay; comply with applicable working hours laws, including overtime hours; act to eliminate any form of forced labor – and work to eradicate child labor – from their operations and supply chains; and, respect land

resources and tenure rights for everyone, especially for indigenous people, local communities, and ethnic or minority groups.

7. PROTECT CEL'S INFORMATION, ASSETS, AND INTERESTS. We expect our Supplier Partners to protect CEL's reputation and any information or property we entrust to them.

We expect our Supplier Partners to: protect any of CEL's confidential information to which they have access, including its intellectual property, trade secrets, or financial information; Safeguard any property belonging to CEL while under their control; and, avoid any situations that may adversely affect our business interests or reputation, and maintain strict standards to promote product, food, and feed safety.

We expect our Supplier Partners to fully cooperate with our reasonable requests for data, information, certifications, and audit access to verify compliance, and to obtain assurances that their own business partners and producers uphold these principles. This Supplier Code of Conduct sets forth the minimum requirements that must be met to be a CEL Supplier Partner. We encourage our Supplier Partners to have due diligence and management systems in place to maintain these minimum requirements. By working closely with our Supplier Partners, we believe we can achieve mutual success while helping communities and the wider world thrive.