



# Supplier Code of Conduct

Ludell manufacturing is committed to lawful, ethical, and fair practices in all operations and we conduct business with suppliers who share that commitment. This Supplier Code of Conduct applies to all entities doing business with Ludell Manufacturing and communicates our expectations that our suppliers will practice the highest legal, moral, and ethical standards when conducting our affairs to contribute to our core values of Commitment, Continuous Improvement, and Integrity. Suppliers must follow the Supplier Code of Conduct.

Suppliers are responsible for monitoring adherence to this Code of Conduct for themselves and their supply chains, which is any third parties with whom they do business, including subcontractors. All suppliers must be able to demonstrate compliance with these requirements at the request of Ellis. Suppliers shall take necessary corrective actions to promptly remediate any noncompliance and shall actively engage in any remediation, including timely preparation and presentation of a Corrective Action Preventative Action (CAPA) plan. Ludell reserves the right to terminate business at any time for non-compliance under this Supplier Code of Conduct.

## Ellis' Required Minimum Standards of Conduct

- **Laws and Regulations:** Suppliers must operate in full compliance with all applicable laws and regulations of the countries in which they operate. If a supplier's compliance with the requirements of this Code of Conduct would result in a breach of applicable law or regulation, the applicable law or regulation shall control.
- **Supply Chain:** Any third-party participating in the manufacture of products or components, including subcontractors, must be compliant with this Supplier Code of Conduct. Ludell reserves the right to request proof of supply chain compliance.
- **Data Protection:** Suppliers shall comply with all applicable laws and directives providing for the protection, transfer, access, and storage of personal information. This includes, but is not limited to, General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679).
- **Human Trafficking:** All forms of human trafficking, slavery, forced, convict, bonded (including debt bondage), or indentured labor of any kind are forbidden, including physical abuse and corporal punishment. This includes, but is not limited to, transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction, or fraud for labor or services. This also includes, but is not limited to, compliance with Countering America's Adversaries through Sanctions Act, California Transparency in Supply Chains Act of 2010, and UK Modern Slavery Act. There shall be no unreasonable restrictions on workers' freedom of movement in the facility or upon entering or exiting company-provided facilities. As part of the hiring process and prior to the worker

departing from his or her country of origin, workers must be provided with all documents relevant to their employment in a language they understand with a description of terms and conditions of employment and there shall be no substitution or changes allowed in such documentation upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work must be voluntary and workers shall be free to terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate, or deny access by workers to their identity or immigration documents, such as government-issued identification, passports, or work permits, unless such holdings are required by law. Foreign migrant factory workers shall not be required to pay employers' or agents' recruitment fees or other related fees for the purpose of being hired or as a condition of employment.

- **Child Labor:** All workers must be at least the local legal age, above the oldest compulsory school age, and in no case less than 15 years old. Suppliers must also comply with all local legal requirements for the work of authorized young workers, particularly those pertaining to hours of work, wages, and working conditions.
- **Health and Safety:** Suppliers must provide a safe and healthy working environment in accordance with applicable laws and regulations. At a minimum, workers must have access to first-aid, fire exits, safety equipment, potable water, clean, operational toilet facilities, and eating facilities. If residential facilities are provided, they must be clean and safe with adequate personal space, entry and exit privileges, emergency egresses, heat and ventilation, and water for bathing and showering.
- **Work Hours:** Except in extraordinary business circumstances, workers shall not work more than the lesser of (a) sixty (60) hours per week, including overtime or (b) the limits on regular and overtime hours allowed by applicable law. In addition, all workers shall be entitled to at least one day off in every consecutive seven-day period.
- **Wages and Benefits:** Wages must be set at or above local minimum wage and compensation requirements (including overtime), as defined by applicable labor laws, applicable agreements, and local regulations for regular work, overtime work, production rates, and other elements of compensation and employee benefits.
- **Non-Discrimination:** Employment (hiring, salary, benefits, promotion, training, discipline, termination, retirement, or any other terms and conditions of employment) must be based on merit and ability to perform the job requirements, not on characteristics such as race, creed, color, religion, sex, age, national origin, disabilities, veteran status, marital status, sexual orientation, gender, gender identity or expression, military status, or any other characteristic protected by applicable law, including, but not limited to, US federal law.