

Summary

Huizenga Group Automation (Company) supports the protection of international human rights within the realm of its existence and is committed to the highest ethical standards. This Code of Conduct and Basic Working Conditions policy (this “Code of Conduct”) represents the overarching principles guiding the business practices of the Company and the Company expects the same of its Suppliers.

The Company’s principles and guiding business practices are consistent with the human rights frameworks identified in the following:

- The United Nations Universal Declaration of Human Rights
- The United Nations Global Compact
- The organization for Economic Co-Operation and Development (OECD) Guidelines for Multinational Enterprises
- The Global Sullivan Principles of Social Responsibility

The Company will not do business with Suppliers that violate this Code of Conduct.

Definitions

“Supplier”: As used in this policy, the term “Supplier” shall mean all entities and persons supplying goods and services to the Company.

Policy/Scope**Child Labor**

Supplier will comply with local minimum age laws and requirements and in any case will not employ child labor (defined as any person under the age of 16). Age exceptions will be made where legally allowable for authorized job training or apprenticeship programs that bear a clear benefit to the participants. Positions or activities that involve increased risk require appropriate safety training and require employees to be older than 18 years.

Work Authorization

Supplier will require that its employees and labor suppliers meet work permit compliance and global immigration requirements as well as legal status in the respective country of operation.

Ethical Recruiting

Supplier should ensure that:

- The recruitment process is documented and transparent
- Recruitment is free from discrimination on factors not relating to job performance, such as gender, race, age and beliefs
- Workers should sign contracts and understand their terms of employment before starting work, or leaving their location of origin
- Recruitment fees and deposits are legal and reasonable - suppliers should work towards removing any fees
- Appropriate due diligence is performed on agents and third parties
- Suppliers should aim to employ all workers on permanent contracts

Compensation

Supplier will provide competitive wages and benefits to its employees, which meet or exceed the legally required minimum.

Forced Labor – Modern Slavery

Supplier will not tolerate inhumane treatment of its employees including, but not limited to, physical abuse, harassment, or the threat thereof. Supplier will not employ forced, bonded, or involuntary labor. All employment terms will be voluntary between the Supplier and its employees. In addition, Supplier will not tolerate acts of workplace violence committed by or against its employees or visitors or conduct that creates an intimidating or offensive environment.

Working Hours

Supplier will comply with local applicable laws regulating work hours, allowing for alternate schedules to be utilized in meeting business needs so long as the schedule remains in compliance with local laws.

Freedom of Association & Collective Bargaining

Supplier will not discriminate against employees based on specific associations that an employee may have and further must recognize an employee's right to associate with a legally sanctioned organization if s/he chooses.

Discrimination and Harassment & Woman's Rights

Supplier will be committed to providing a work environment where all employees and others who do business with the Supplier, regardless of position or status, and regardless of nationality and national origin, race, religion, gender, physical abilities, sexual orientation, age, or other characteristics, are treated with dignity, respect, and equality. Supplier will not tolerate behavior that undermines gender equality, reduces the quality of working life or jeopardizes the wellbeing of its employees, whether committed by or directed toward subordinates, coworkers, managers, suppliers, or customers. Supplier will be committed to providing a business environment in which we value and respect the differences that make individuals unique.

Diversity, Equity & Inclusion

Huizenga Group Automation encourages suppliers to develop and promote inclusive cultures where diversity is valued and celebrated and everyone is able to contribute fully and reach their full potential. Suppliers should encourage diversity in all levels of their workforce and leadership.

Rights of Minorities & Indigenous Populations

Supplier will consider local communities to be among primary stakeholders in Supplier projects and activities within those communities. Supplier will work constructively with local officials who have an interest in Supplier Projects and activities that may impact the community.

Supplier shall maintain an aggressive Supplier Diversity program. Through this diversity, the Supplier will enrich its business environment and create more efficient relationships with employees, customers, supply base, and the local communities.

Whistleblowing & Protection from Retaliation

Suppliers shall maintain whistleblower confidentiality and prohibit retaliation against workers who participate in such programs in good faith and shall refuse an order that is in violation of Huizenga Group

Automation's Supplier Code of Conduct. Moreover, Supplier must prohibit retaliation against employees who raise complaints regarding Supplier's policies against discrimination and harassment, participate in the investigation of any complaint, or engage in any other protected activity under federal, state and local laws. Suppliers shall provide and promote an anonymous complaint mechanism for workers to report workplace grievances in accordance with local laws and regulations. If Supplier receives or becomes aware of any complaints involving Huizenga Group Automation employees, Supplier must immediately notify Huizenga Group Automation.

Health and Safety

Supplier will provide and maintain for all of its employees a safe and healthy work environment that meets or exceeds applicable standards for occupational safety and health. The Supplier's commitment to protect employees and the environment will be a top priority. Supplier's manufacturing facilities will manage safety in accordance with a management system, either integrated as part of ISO 14001 or separately under OSHA 18001.

Anti-Corruption & Anti-Money Laundering

Supplier shall maintain the necessary internal controls, security measures, and technological safeguards to detect and prevent bribery, corruption, money laundering, embezzlement, extortion and fraud, including in countries or regions where the local customs may appear to make it seem allowable. Both as a matter of sound procurement practice and basic business integrity, Supplier will make purchase decisions solely on the basis of which suppliers offer the best value for the goods or services needed. Supplier will avoid any conduct that suggests that its purchase decisions may be influenced by any irrelevant or improper consideration, whether illegal, such as a kickback or bribe, or technically legal, such as personal friendship, favors, gifts, or free entertainment. Based upon the National Association of Purchasing Management (NAPM) "Principles & Standards of Purchasing Practice" guidelines, any 'grey' area in purchasing decisions will be address by using common sense and good judgment.

Export Controls & Economic Sanctions

Huizenga Group Automation does not conduct activities nor assist any other party in violating applicable economic sanctions or export control laws and regulations. Suppliers shall comply with applicable economic sanctions and export control laws and regulations and avoid doing anything that would position themselves or Huizenga Group Automation in violation of applicable economic sanctions and export controls.

Fair Competition & Anti-Trust

Suppliers will comply with all applicable competition and antitrust laws and regulations. In addition to adherence to applicable laws and regulations, Suppliers must not discuss or agree with any competitors to (1) fix or control prices; (2) coordinate during a bidding process; (3) boycott suppliers or customers; (4) divide or allocate markets, territories, products, customers, or suppliers; or (5) limit the production or sale of products or product lines. Suppliers will only use legal means to gather information about sellers of products that compete within the Automation industry.

Conflict of Interest

A conflict of interest exists when a person's or business' private interest interferes in any way with the interests of Huizenga Group Automation. Suppliers must disclose any actual or potential conflicts of interest due to either personal or business relationships with anyone, including but not limited to

suppliers, business associates, competitors of Huizenga Group Automation or Huizenga Group Automation employees.

Intellectual Property

Suppliers shall respect intellectual property rights of third parties and safeguard customer confidential information. Suppliers shall manage technology and know-how that it receives in a manner that protects those intellectual property and confidentiality rights. Suppliers will not make public any reference to or details of its business transactions with Huizenga Group Automation, without Huizenga Group Automation's prior consent.

Counterfeit Parts

Supplier shall ensure the existence of methods and processes to: minimize the risk of introduction of counterfeit parts into final products; detect counterfeit parts and materials; provide notification to recipients of counterfeit products; and remove any counterfeit parts from the final products.

Use of Public and Private Security Forces

Our suppliers shall ensure, if they engage private or public security forces for the protection of their production facilities, operating sites and other premises, that the security forces are appropriately trained and controlled so that they observe the prohibition of torture and cruel, inhuman or degrading treatment, do not harm life and limb and do not infringe on the freedom of association and trade union.

Environment & Sustainability

Supplier strives to meet or exceed applicable environmental laws and standards, and to continually improve environmental health and safety management systems, including implementing practices to prevent pollution, increase energy efficiency and minimize waste, including reuse and recycling measures. Supplier is committed to protecting the environment as a top priority.

Land, Forest and Water Rights & Forced Evictions

Suppliers should avoid forced eviction and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters.

Data Protection and Data Security

Huizenga Group Automation requires its Suppliers to protect the privacy of individuals and the security of confidential assets and information. Suppliers must protect Huizenga Group Automation's and its clients' confidential assets and information. Suppliers must design and maintain processes to provide appropriate protections for this information. Huizenga Group Automation requires Suppliers to protect personal information in compliance with all applicable local laws. Personal information provided by or on behalf of Huizenga Group Automation should only be used, accessed, and disclosed as permitted by the Supplier agreement.

Financial Responsibility & Disclosure of Information

Suppliers are required to accurately record and disclose information regarding their business activities, structure, financial situation, and performance in accordance with applicable laws and regulations and prevailing industry practices. Additionally, Suppliers must use sound financial practices and ensure transparency in financial dealings by implementing and maintaining adequate internal controls.

Administration/Responsibilities

All of Supplier's employees are committed to implementing and adhering to these requirements.