



AXIOMATIC SUPPLIER CODE OF CONDUCT – November 23, 2023 Ver 2.0.

As reflected in the Axiomatic Code of Conduct, AXIOMATIC is committed to high standards of integrity and sustainability. AXIOMATIC has a 'zero tolerance' policy when it comes to unethical business behaviour, such as bribery and corruption. We expect all of our suppliers to adhere to similar standards and to conduct their business ethically. As a supplier, you must comply with all applicable laws and regulations, the requirements set out in this AXIOMATIC Supplier Code of Conduct and your contractual obligations to us.

This AXIOMATIC Supplier Code of Conduct defines the main principles underlying your business activities as one of our suppliers. More specific guidance, including information on hazardous substances and conflict minerals and where to go for questions, is available on <https://www.axiomatic.com/corporate/>.

1. Human rights

As a supplier to AXIOMATIC, you shall

- respect the personal dignity, privacy and rights of each individual;
- refuse to make any person work against his or her will; and
- not tolerate behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

2. Fair labour conditions and child labour

You shall ensure fair labor conditions. In particular, you will

- refrain from employment discrimination based on gender, age, ethnicity, nationality, religion, disability, union membership, political affiliation or sexual orientation;
- respect the rights of employees to freely associate and bargain collectively;
- not tolerate or use child labour in any stage of your activities other than in accordance with all applicable laws and regulations;
- not use any forced labour or involuntary prison labour and allow all employees the choice to leave their employment freely upon reasonable notice;
- compensate employees fairly and follow local wage regulations and / or collective agreements, and where these do not exist, compensate employees so at the minimum they can meet their basic needs;
- ensure that working hours, including overtime, do not exceed applicable legal limits, and where such limits do not exist, we recommend that working hours not exceed sixty hours per week including overtime;
- ensure that employees are allowed at least one uninterrupted day off per week; and
- Comply with applicable local legislation such as Ontario's Employment Standards Act 2000 (ESA) and its regulations or your local relevant laws and regulations.

3. Health, safety and environmental management

You shall provide a safe and healthy workplace for all of your employees and shall conduct your business in an environmentally sustainable way. In particular, you will

- formally appoint a competent person to manage health, safety and environmental programs and improvements;
- establish appropriate organizational structures and procedures for the effective management of health, safety and environmental risks; and
- ensure that all workers are sufficiently aware of these risks and appropriately trained on the implementation of control measures.

4. Materials compliance and conflict minerals

At AXIOMATIC, 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 AXIOMATIC are in compliance with requirements covered under the scope of all relevant regulations. In particular, you will

- declare to AXIOMATIC substances which are listed in the "REACH or RoHS Directives' Lists of Prohibited and Restricted Substances or Substances of Very High Concern" and contained in the goods you supply to AXIOMATIC;
- implement a policy regarding conflict minerals and exercise due diligence to investigate the source of these minerals; and
- respond in a timely manner to AXIOMATIC's requests for evidence of your compliance with these requirements.

Axiomatic Technologies Corporation

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5. Business ethics

You shall conduct your business in an ethical manner. In particular, you will

- refrain from any and all forms of corruption, extortion and bribery, and specifically ensure that payments, gifts or other commitments to customers (including AXIOMATIC employees), government officials and any other party are in compliance with applicable anti-bribery laws;
- adhere to anti-trust and other competition laws;
- disclose to AXIOMATIC information regarding potential conflicts of interest relating to your activities as an AXIOMATIC supplier, including disclosure of any financial interest an AXIOMATIC employee may hold in your business;
- protect all confidential information provided by AXIOMATIC and our respective business partners;
- respect intellectual property of others, including AXIOMATIC; and
- adhere to international trade regulations and export control regulations.

6. Secure business

You shall conduct your business in a secure manner. In particular, you will

- implement reasonable measures for minimizing exposure of AXIOMATIC to security threats such as terrorism, crime, pandemics cybersecurity, and natural disasters; and
- ensure appropriate data protection regarding personal data of Axiomatic and our respective business partners; and
- when visiting or working at AXIOMATIC locations, abide by AXIOMATIC's security procedures and report any security concerns to the appropriate AXIOMATIC channels.

7. Procurement by supplier

You shall procure goods and services in a responsible manner. In particular, you will

- select your own suppliers providing goods or services directly or indirectly to AXIOMATIC based on them agreeing to adhere to standards comparable to those set forth in this AXIOMATIC Supplier Code of Conduct; and
- when working at AXIOMATIC offices and factories, only subcontract work with prior consent from AXIOMATIC.

8. Inspections and corrective actions

In order to ensure and demonstrate compliance with the AXIOMATIC Supplier Code of Conduct, you shall keep record of all relevant documentation, and provide to us supporting documentation upon request.

To verify your compliance, we reserve the right to audit and inspect your operations and facilities, at our own cost and upon reasonable notice, with or without support of a third party. If the results of such an audit or inspection cause us to be of the opinion that you do not comply with this AXIOMATIC Supplier Code of Conduct, you shall take necessary corrective actions in a timely manner, as directed by us. If you fail to comply with this AXIOMATIC Supplier Code of Conduct, then we may take action against you, including suspending or terminating your activities as one of our suppliers.

9. Access to remedy

In the context of our business relationship, if you or your employees believe that the terms of this AXIOMATIC Supplier Code of Conduct are not adhered to, or that AXIOMATIC is not acting in accordance with its own AXIOMATIC Code of Conduct, then we encourage you to raise your concerns via your AXIOMATIC contact.

Thank you for supporting Axiomatic.
Regards,

A. Greville Hampson
President
Axiomatic Technologies Corporation