

# Supplier Code of Conduct

## I. Overview

IWCO values the trust our clients place in us, and we remain committed to the highest standards of ethics and integrity to maintain that trust. IWCO's Supplier Code of Conduct ("Supplier Code" or "this policy") outlines business practices centered on professional and personal conduct that everyone is expected to follow to ensure the mutual success of IWCO, our suppliers, and our clients.

This policy applies to all suppliers, vendors, consultants, distributors and their agents, and third-party vendors and service providers (collectively "Suppliers") irrespective of the goods or services provided to IWCO. It is not intended to limit or replace any legal or regulatory requirements that may exist. With each delivery of goods or services to IWCO, along with each invoice presented to IWCO, Suppliers re-certify compliance to the standards outlined in this Supplier Code.

Compliance is subject to audit, and IWCO reserves the right to take appropriate action for a Supplier's failure to comply, which may include the suspension or termination of current work or the complete termination of a continued business relationship with IWCO.

## II. Scope

### ETHICAL BEHAVIOR

- **Antitrust and Fair Competition.** Suppliers are expected to conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which they operate or to which they are subject based on their business operations.
- **Anti-Corruption.** All Suppliers must fully comply with anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), and all anti-money laundering laws. IWCO does not allow any bribes or improper payments, including kickbacks, unexplained rebates, payments for advertising, or gifts disguised as allowances or expenses.
- **Confidentiality and Privacy.** Suppliers are required to protect IWCO proprietary and confidential information, and all information of our clients that we are permitted to share with Suppliers. Suppliers must have and enforce policies that comply with the confidentiality of the information regardless of the source. Any use, disclosure, handling, and retention of IWCO's information or data, or the information or data of our clients, must be in accordance with any applicable agreements.
- **Conflict of Interest.** Suppliers should avoid any transactions, relationships, or other acts that are or may appear to be a conflict of interest.
- **Gifts.** IWCO employees may not accept gifts from any Supplier if the gift is more than modest in value, or if accepting the gift might create the appearance of a conflict of interest.
- **Intellectual Property.** Suppliers must safeguard IWCO's intellectual property rights and confidential information. Any use, disclosure, and handling of IWCO's technology, knowledge, and other IWCO intellectual property must be in accordance with any applicable agreements.

- **Legal Compliance.** Suppliers must fully comply with all applicable national, state, and/or local laws, regulations, and ordinances, including obtaining and maintaining all applicable permits or certifications required for its business operations. Suppliers must also be fully compliant with their obligations to any applicable agreement, understanding, or other binding commitment.

### ENVIRONMENTAL STEWARDSHIP

IWCO expects Suppliers to conduct business in ways that help preserve and protect the environment and demonstrate accountability and transparency in its business operations. Suppliers are expected to track and report their commitment to environmental stewardship.

- **Compliance.** Suppliers must fully comply with all applicable environmental laws in the performance of their services and are required to ensure any goods and materials it imports, exports, transports, sells, receives, acquires or purchases (via interstate or foreign commerce) are not obtained from illegal sources. IWCO expects notification of any significant compliance violations.
- **Conservation.** Suppliers are expected to proactively monitor their environmental impacts through policies and programs that conserve natural resources, reduce greenhouse gas emissions, minimize waste, reuse and recycle materials, promote the purchase of sustainable products and services, and promote sustainable construction and building modifications.
- **Hazardous Waste Management.** Suppliers must implement and maintain policies related to the safe management of hazardous materials. Suppliers are required to provide IWCO with all necessary information and ensure hazardous goods and materials are properly packaged, labeled, transported, and disposed of according to all applicable laws.

### SOCIAL RESPONSIBILITY

IWCO strives to have a positive impact in the communities where we operate. We promote basic human rights and comply with all laws that govern labor practices, working hours and conditions, wages, and other issues that affect workers' health and safety. IWCO expects Suppliers to have the same commitment to social responsibility.

- **Anti-Slavery and Human Trafficking.** IWCO prohibits the use of slavery and human trafficking in Suppliers' facilities and operations, as well as the use of any form of forced, coerced, bonded, indentured, or prison labor. Supplier will promptly notify IWCO if it becomes aware of any actual or suspected slavery or human trafficking in its supply chain, irrespective of whether it impacts the goods or services provided to IWCO.
- **Child Labor.** IWCO prohibits the use of any child labor. Suppliers must only use workers who meet the minimal legal age for employment as defined by local law where they work, as well as for the type of work. Supplier will promptly notify IWCO if becomes aware of any actual or suspected child labor in its supply chain, irrespective of whether it impacts the goods or services provided to IWCO.
- **Equal Opportunity.** Suppliers must provide equal employment opportunities and fair and equal treatment to people regardless of their race, color, creed, religion, age, disability, nationality, marital status, pregnancy and maternity, gender, sexual orientation, veteran status, or status regarding public assistance. Equal opportunity must extend to all employment decisions, including recruiting, hiring, training, promotions, compensation, benefits, transfers, and workforce reductions.

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- **Fair Compensation.** Suppliers must comply with all applicable national legal standards with regards to minimum wages, overtime, and maximum hour rules that are established by laws and regulations in the locations they operate in.
- **Recruitment.** Suppliers must practice ethical recruitment (directly or through third-party agencies) and avoid worker exploitation through the recruitment process. Suppliers must: prohibit confiscation of workers' identity documents; provide workers with a written document stating the terms and conditions of employment at the point of recruitment in a language the job seeker can understand; and prohibit payment of recruitment fees by workers or require repayment when fees have been paid. Suppliers shall ensure third-party recruitment agencies it employs are compliant with the provisions of this Supplier Code and the law.
- **Freedom of Association and Collective Bargaining.** Suppliers must respect the rights of workers, without distinction, to form or join trade unions of their choosing and to bargain collectively.
- **Health and Safety.** Suppliers must provide a healthy, sanitary, and safe environment for their workers; free from physical, emotional, and verbal harassment, or any other abusive or threatening behavior. Suppliers are required to implement policies prohibiting the use of illegal weapons, alcohol, and illegal drugs and other controlled substances in the workplace. Additionally, Suppliers must have measures in place to prevent workers' exposure to safety hazards, monitor workplace injuries and illnesses, and ensure emergency preparedness. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers. Suppliers are required to maintain Health and Safety and training records.
- **Supplier Diversity.** IWCO is committed to including qualified small and diverse Suppliers in its sourcing processes and supply chain. IWCO expects all Suppliers to support this commitment by deploying strategies and programs to increase sourcing opportunities for small and diverse businesses in their own supply chains, where applicable. Suppliers are expected to track and report their commitment to engaging small and diverse Suppliers.

### BUSINESS CONDUCT

Suppliers are expected to always conduct business ethically and professionally and in a manner that complies with all applicable laws and regulations, as well as applicable IWCO policies and procedures which may be provided to them from time to time. If informed by IWCO, Suppliers are also required to comply with the policies and procedures of our clients, which may flow down and apply to the goods and services provided.

- **Attestation and Audit.** Suppliers are required to timely respond and cooperate with all reasonable requests from IWCO for information, including without limitation, requests for Supplier's own operating policies and procedures, licenses and certifications, financial statements, internal and external audit results, evidence of performance, and/or attestation of compliance with this Supplier Code. Suppliers are further required to make its personnel and its Suppliers available for audits by IWCO, and if required by contract, third-party auditors including regulators and/or IWCO clients.
- **Continuous Improvement.** Suppliers are expected to establish goals, objectives, and targets in conjunction with their business operations to improve performance, reduce cost, increase quality, and mitigate associated risks and be willing to share its efforts and results with IWCO. Suppliers are also expected to promote a culture of continuous improvement in its organization and within IWCO.

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- **Management Systems.** Suppliers are expected to have systems in place to manage product and service quality, environmental impact, labor standards, health and safety risks, ethical business conduct, continuity risks, and continuous improvement. Suppliers must have adequate training programs for employees to ensure the appropriate level of knowledge and skills to meet the standards specified in these areas. Suppliers must also make these requirements with their own Suppliers.
- **Publicity.** IWCO does not allow Suppliers to use its name or logo in any public display or document without prior written approval, which IWCO may withhold in its sole discretion. In addition, without IWCO approval, Suppliers may not disclose their relationship with IWCO, or the goods or services provided to IWCO, any non-public information in any public venues, including press releases, websites, social media, trade shows, or Suppliers' facilities.
- **Transparency.** Suppliers shall remain transparent about their business activities, structure, supply chain, financial situation, performance, and business as required by any applicable laws and industry standards. Suppliers are expected to share residual knowledge and best practices to improve and enhance the relationship between IWCO and Supplier.

### III. Roles and Responsibilities

Suppliers are responsible for reviewing and ensuring compliance with this Supplier Code. Suppliers may direct questions about the Supplier Code to any IWCO employee.

IWCO's Chief Supply Chain Officer is responsible for ensuring the Supplier Code is maintained and communicated to all Suppliers and IWCO department leaders and personnel.

Every IWCO employee is responsible for reinforcing the Supplier Code with Suppliers.

### IV. Reporting Concerns

Suppliers or other external parties wishing to report concerns regarding issues detailed in this document are encouraged to contact IWCO's compliance website administered by Navex at: [www.iwco.ethicspoint.com](http://www.iwco.ethicspoint.com) or call toll-free 1-833-612-2974, which will be answered as Navex.

IWCO personnel with questions or concerns may also contact Navex or contact their immediate manager.