

DEW ENGINEERING AND DEVELOPMENT ULC SUPPLIER CODE OF CONDUCT

DEW is committed to ethical and socially responsible business practices and strives to align this commitment with our purchasing policies and our supply chain management.

This DEW Supplier Code of Conduct defines the minimum standards that must be met by our suppliers, vendors, subcontractors, contract manufacturers, and third-party intermediaries (“Suppliers”) concerning their responsibilities towards all individuals, communities, and the environment.

Respect for the basic human rights of workers: Suppliers must;

- not use forced or involuntary labor of any kind, such as prison labor, slave labor, debt bondage, indentured labor, or participate in human trafficking activities;
- not use or employ workers under the age of 15 or the minimum age for employment in the applicable country, whichever is greater;
- employ, promote, and compensate workers based on their ability to perform the work irrespective of gender, race, ethnicity, nationality, religion, age, disabilities, sexual orientation, gender identity, genetic information, pregnancy, marital status, political affiliation, union membership, social association, veteran status, or other status protected by applicable law or custom;
- respect the personal dignity, privacy, and rights of every individual and not tolerate any unacceptable treatment or harassment of individuals, such as harsh or inhumane treatment, sexual harassment or abuse, corporal punishment, mental or physical coercion, or verbal abuse;
- follow all applicable laws for conditions of employment, including maximum hours & overtime and minimum wage & benefits; and
- respect the right of workers to join or organize associations of their own choosing and to bargain collectively without fear of reprisal.

Health and safety of workers: Suppliers must;

- provide a safe and healthy workplace with adequate procedures, training, and personal protective equipment to control hazards and prevent accidents and injury to its workers; and
- Make readily available material safety data sheets and other information in languages its workers understand about the safe handling, use and storage of hazardous materials.

Environmental protection: Suppliers must;

- comply with all applicable laws and international standards regarding environmental protection, such as those related to air emissions, solid and waste water disposal, and proper use and disposal of hazardous substances; and
- strive to reduce their negative impact on the environment through reduced energy consumption, the conservation of natural resources, minimizing pollution, and making continuous improvements in environmental protection.

Legal compliance: Suppliers must know and comply with all laws and regulations of the applicable legal systems and with all trade agreements pertaining to international business activities.

Prohibition of corruption and bribery: Suppliers must;

- not engage, directly or indirectly, in any form of corruption or bribery; and
- not grant, offer or promise anything of value to a government official or a counterparty in the private sector to influence an official action or obtain an improper advantage.

Conflicts of interest: Suppliers must avoid all personal, business and other activities that may, or may appear to, adversely influence or conflict with business relationships or decisions.

Fair competition: Suppliers must;

- act in accordance with all national and international competition and antitrust laws; and
- not participate in price fixing, market or customer allocation, market sharing, or bid rigging with competitors.

Proprietary information: Suppliers must;

- respect the intellectual property rights of DEW and others; and
- protect the confidential information entrusted to them by DEW and others.

Conflict Minerals: Suppliers must;

- make all reasonable efforts to avoid the use of raw materials that, directly or indirectly, finance armed groups who violate human rights; and
- comply with all disclosures required under applicable law regarding the use of conflict minerals.

Supply Chain: Suppliers must make all reasonable efforts to ensure that all participants in their supply chains comply with this DEW Supplier Code of Conduct. Any failure to meet the standards of this DEW Supplier Code of Conduct by a Supplier or a member of the Supplier’s supply chain may result in immediate termination of the Supplier’s relationship with DEW.