

OBE Supplier Code of Conduct

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Introduction

OBE is committed to the highest levels of legal, ethical and moral standards, which we set out in our Code of Business Conduct. We expect the same level of commitment from our suppliers, contractors, agents, and all other representatives that provide goods or services to or on behalf of OBE ("Supplier"). This Supplier Code of Conduct (the "Supplier Code") lays out the standards that Suppliers need to meet throughout their operations and supply chain.

If at any time a Supplier or Supplier employee believes that an OBE employee or OBE Supplier has acted in violation of this Supplier Code, they should report their concern to our OBE Hotline at 833-204-8782 or online at www.lighthouse-services.com/ohe. Complaints can be submitted anonymously where permitted by law. OBE prohibits retaliation, intimidation, or harassment against anyone who, in good faith, reports a suspected violation.

Commitment to Ethics

We place business ethics and Corporate Social Responsibility (CSR) at the forefront of all our business dealings, including those with our Suppliers, both direct and indirect, recognizing that Suppliers are key stakeholders in the success of our business. Not surprisingly, our procurement requirements are very high; we expect our Suppliers to share our desire to be the best, to be innovative, efficient and quality driven.

Supply Chain Accountability

We only choose Suppliers who share our unwavering commitment to good ethical practices and who meet our standards in respect of human rights, health & safety, environmental stewardship, and ethical behavior. This Supplier Code sets out our standards and expectations. In return, we strive to be a fair and honest partner, firmly believing that relationships built on trust and integrity will be sustainable and beneficial for all.

Labor and Human Rights

Freely Chosen Employment

All labor must be voluntary. Suppliers must not support or engage in slavery or human trafficking in any part of their supply chain. Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. Suppliers shall allow workers to terminate their employment or work arrangement without restriction, and without the threat or imposition of any discipline, penalty, retaliation, or fine or other monetary obligation. Suppliers may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits.

Freedom of Movement

There shall be no unreasonable restrictions on workers' freedom of movement in the facility and no unreasonable restrictions on entering or exiting company provided facilities including, if applicable, workers' dormitories or living quarters.

Work done by Young Persons and Child Labor

Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.

Working Hours

Working hours are not to exceed the maximum set by local law. Further, a work week should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers must be allowed at least one day off every seven days.

Compensation and Benefits

Suppliers must compensate all workers with wages, including overtime premiums, and benefits that at a minimum meet the higher of the minimum wage and benefits established by applicable law, collective agreements, local industry standards, or an amount sufficient to cover basic living requirements.

Anti-discrimination, Anti-Harassment, and Humane Treatment

Suppliers shall commit to a workplace free of harassment and unlawful discrimination. There shall be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Suppliers shall not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement, or any other employment practice based on race, color, national origin, gender, gender identity, sexual orientation, military status, religion, age, marital or pregnancy status, disability, or any other characteristic other than the worker's ability to perform the job.

Freedom of Association and Collective Bargaining

Suppliers shall respect, and shall not interfere with, the rights of workers to decide whether to lawfully associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining.

Grievance Mechanism and Reporting

All workers must be free to voice their concerns and seek resolution of issues covered by this Supplier Code confidentially and free from retaliation. Suppliers must maintain an equitable and effective grievance mechanism for workers to submit their grievances. Suppliers are encouraged to have an effective resolution process, clearly communicated to workers, to timely investigate and address worker concerns.

Health and Safety

Safe Working Conditions

Suppliers shall provide a safe, healthy, and sanitary working environment. Suppliers shall implement procedures and safeguards to prevent workplace hazards, and work-related accidents and injuries, including procedures and safeguards to prevent industry-specific risks.

Emergency Preparedness

Potential emergency situations and events need to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including appropriate emergency reporting, employee notification and evacuation procedures, worker training, and drills. Among other things, Suppliers should ensure the safety of all worker facilities.

Occupational Injury and Illness

Suppliers shall have procedures and systems that are designed to prevent, manage, track and report occupational injury and illness. Suppliers shall allow workers to remove themselves from imminent harm without fear of retaliation.

Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks is to be identified and controlled.

Machine Safety

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, barriers and/or other appropriate safety mechanisms shall be provided and properly maintained to prevent injury hazards to workers.

Sanitary Conditions for Food and Housing

Workers shall be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker accommodation provided by a Supplier or a labor agent should be clean, safe, comfortable, and secure.

Environmental Responsibility

Environmental compliance

Suppliers shall operate facilities in compliance with all applicable environmental laws and treaties, including those relating to waste disposal, emissions, discharges, and hazardous and toxic material handling.

Inputs and Components

Suppliers must ensure that the goods that they manufacture (including the inputs and components incorporated into those goods), and packaging materials they use, comply with all applicable environmental laws .

Ethical Commitments

Business Integrity

The highest standards of integrity shall be upheld in all business interactions. Suppliers shall prohibit any and all forms of bribery, corruption, extortion, and embezzlement.

No Bribery

It is prohibited to promise, offer, authorize, give, or accept anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Suppliers must implement appropriate procedures to ensure compliance with anti-bribery and anti-corruption laws.

Disclosure of Information

All business dealings should be transparently performed and accurately reflected on the Supplier's business books and records. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable. Suppliers must comply fully with all disclosure requirements applicable to them under national, state, local, or any other applicable law. Suppliers also must comply fully with all requests from OBE to provide records related to business conducted for or with OBE, including information to demonstrate the Supplier is in compliance with this Supplier Code.

Intellectual Property

Intellectual property rights shall be respected, transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and proprietary information received from OBE or any other transaction partner shall be safeguarded.

Whistleblower Protections

Suppliers must protect worker whistleblower confidentiality and prohibit retaliation against whistleblowers who in good faith report improper conduct (for example, related to an environmental or human rights violation, workplace grievance, or unethical business practice) by a Supplier or an employee or officer of a Supplier.

Responsible Sourcing of Materials

OBE is committed to avoiding the use of minerals that have fueled conflict. Suppliers are expected to support this effort and, consistent with recognized due diligence frameworks, work to identify the origin of designated minerals used in our products. In particular, Suppliers should source from smelters and refiners that have successfully completed a recognized third-party responsible minerals audit.

Suppliers also should source commodities in a way that respects local communities and protects ecosystems. Suppliers should consistently monitor the social and environmental performance of their upstream suppliers in line with recognized due diligence frameworks.

Prohibited Business Partners

The U.S. and other governments prohibit transactions with certain designated countries, governments, entities, and individuals in order to protect national security and human rights. Thus, no Supplier should engage in any export, import, or any other transaction for or on behalf of OBE with any prohibited country or party.

Suppliers also must not engage in any anti-competitive conduct on behalf of or in any way related to OBE. We are committed to competing hard but fairly and we expect Suppliers to do the same.

Privacy

Suppliers must comply with applicable privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

Management Systems

Suppliers should adopt a management system to drive continuous improvement in accordance with this Supplier Code and maintain compliance with applicable laws. OBE also expects Suppliers to take all steps necessary to ensure that upstream suppliers and other partners are complying with their obligations outlined in this Supplier Code and applicable law.

Documentation and Records

Suppliers are required to create, retain, and dispose of business records in full compliance with applicable legal requirements and in conformance with this Supplier Code. Suppliers must maintain appropriate confidentiality to protect privacy. All facilities must maintain a valid business license. Suppliers are responsible for reviewing and complying with all legal requirements and maintaining all required permits and documents necessary to operate.

Training

Suppliers shall establish appropriate training programs so all personnel can comply with operating policies, procedures, and improvement objectives and meet applicable legal and regulatory requirements.

Company Commitments in Written Policies

Suppliers should maintain a process for timely remediation of nonconformance identified by internal or external assessments, inspections, investigations, reviews, and reports.

Risk Management

Suppliers shall adopt or establish a process to identify all risks associated with their operations, determine the relative significance for each risk, and implement appropriate procedural and physical controls to protect against those risks and ensure regulatory compliance.