



## **Supplier Code of Conduct**

HIROTEC AMERICA Inc. is committed to conduct business in an ethical manner through its guiding principles of Sincerity, Modesty and Progress while making a positive contribution within our communities and to society through our product offerings and business activities.

Our Supplier Code seeks to instill a culture that promotes ethical behavior and compliance with all applicable laws and regulations. Complying with the law and observing our ethical obligations are essential conditions for fulfilling our duties to each other, our customers, and society. We expect the same high standards from our suppliers.

HIROTEC AMERICA Inc. requires all suppliers, vendors, contractors, consultants, agents, and other providers of goods and services to adhere to the Supplier Code.

We expect our Suppliers and business partners to communicate these expectations throughout their supply chain by adopting efficient management systems, policies, procedures, and training to uphold the standards and expectations set forth in this Supplier Code within their own business operations striving for sustainability and continuous improvement.

**BUSINESS PRACTICES:** Our suppliers must conduct their business lawfully and with integrity, including:

**Compliance with all applicable laws and regulations.** Our suppliers must comply with all applicable laws and regulations in the countries in which they operate.

**Antitrust and Fair Competition.** Our suppliers are expected to comply with all fair competition laws and not engage in illegal monopolies, illegal behavior, price fixing, collusive bidding, price discrimination, and other unfair practices.

**No bribery or corrupt payments.** Our suppliers will not tolerate corruption, bribery, fraud, or embezzlement in any form. This includes giving or receiving anything of value, including money, gifts, or unlawful incentives to improperly influence negotiations or any dealings with customers, third parties or governments/government officials.

**Intellectual Property.** Our suppliers must respect HIROTEC AMERICA's and third party's Intellectual Property rights. Suppliers must promptly notify HIROTEC AMERICA

if a supplier knows or suspects that supplier's products, or HIROTEC AMERICA 's use of supplier's products, infringe any third-party Intellectual Property rights.

**Conflict of Interest.** Our suppliers are expected to avoid and report all conflicts of interest resulting from their business dealings with HIROTEC AMERICA and to notify HIROTEC AMERICA if any HIROTEC AMERICA employee has business, financial, or personal ties to the supplier that may influence such employee's decisions.

**Gifts.** Gifts to or from HIROTEC AMERICA employees are neither expected nor necessary for business relationships between our supplier and HIROTEC AMERICA. Our Code of Conduct prohibits our employees from giving or receiving gifts of more than a token value, and all gift-giving is discouraged.

**Embargoes and Trade Law.** Our suppliers shall comply with all applicable trade laws and restrictions imposed by the United Nations, the United States, and other national governments.

**Management and Transparency.** Our suppliers are expected to have systems in place to track compliance with applicable laws and regulations and to investigate, to the extent allowed by law, allegations of misconduct. Suppliers must immediately inform HIROTEC AMERICA if they are aware of any negative publicity regarding the supplier, or any product supplied to HIROTEC AMERICA.

**Grievance Mechanism “ Whistle Blower Protection.”** Our suppliers are expected to protect worker confidentiality and prohibit retaliation against workers who report workplace grievances. Suppliers must create a mechanism for workers to submit their grievances anonymously.

Suppliers should communicate to workers, subcontractors, and their vendors the process for raising concerns, and communicate and uphold a policy of confidentiality, protection from retaliation, and anonymity to ensure workers are comfortable doing so. Supplier must hold their vendors accountable. Grievance / Whistleblower claims should be investigated, and corrective actions taken where appropriate

Concerns and violations relating to the Supplier Code of Conduct should be reported directly to HIROTEC AMERICA through [grievancematters@hirotecamerica.com](mailto:grievancematters@hirotecamerica.com) for suppliers, business partners and other parties.

**WORKFORCE PRACTICES / HUMAN RIGHTS:** Our suppliers are expected to provide a safe workplace and treat their employees lawfully, respectfully, and fairly, including:

**No Forced Labor.** Our suppliers are prohibited from using illegal or forced labor of any kind. Suppliers must take reasonable measures to ensure that all their employees understand the terms of their employment.

**No Child Labor.** Our suppliers are prohibited from using child labor. Suppliers will conform with the applicable laws of prohibiting child labor.

**No Harassment or Abuse.** Our suppliers are prohibited from harassing or abusing employees. Our suppliers must treat their employees with respect and dignity, and without harassment or abuse of any kind. To the extent permitted by law, suppliers must strive to provide a workplace free of harassment and abuse arising from fellow workers.

**Nondiscrimination.** Our suppliers must provide equal employment opportunities to all people without discrimination because of their race, religion, color, sex, age, national origin, disability, veteran or military status, or any other characteristic protected by applicable law.

**Human Trafficking.** Our suppliers will not engage, directly or indirectly, in human trafficking.

**Reasonable Compensation.** Our suppliers will pay reasonable compensation and benefits that, at a minimum, comply with all applicable laws and regulations.

**Working Hours and Overtime.** Our suppliers must comply with all applicable requirements and limitations set by the laws of the country of manufacture and ensure work hours, overtime, and schedules are not deemed excessive to the applicable local legal requirements.

**Freedom of Association and Collective Bargaining.** Our suppliers will comply with applicable laws that recognize and respect the rights of employees to freedom of association and collective bargaining.

**Workplace Health and Safety.** Our suppliers must provide a safe workplace for their workers including, at a minimum, adequate lighting, ventilation, potable water, and sanitary facilities. Where applicable, suppliers must provide safety equipment, guards, and protective clothing/masks to protect workers from hazardous machinery and materials.

**ENVIRONMENTAL AND COMMUNITY PRACTICES:** Our suppliers must treat the environment and their community with respect.

**Environmental Impact.** Our suppliers will conduct their businesses in compliance with applicable requirements in a way that minimizes impact to the environment. We also

expect our suppliers to support our own efforts by implementing sustainable operating practices and striving to reduce their use of energy and water and minimize generation of waste.

**Hazardous Waste.** Our suppliers must capture, contain, and dispose of all hazardous wastes safely and in accordance with all applicable laws.

**Property Rights.** Our suppliers must respect property rights in the communities in which they operate and must ensure fair negotiation on all land transfers to which they are a party, and compliance with all applicable laws and regulations related to property rights.

***HIROTEC AMERICA Inc. reserve the right to verify compliance with the Supplier Code of Conduct through internal or external assessment mechanism.***

***Failure to comply with this Supplier Code of Conduct may be grounds for terminating the supplier relationship, and any relevant contracts including but not limiting to suspension of purchases, refusal to take delivery under purchase orders and / or return of goods and services, depending on the seriousness of the violation.***