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Revision Control

REV	SUMMARY OF CHANGE	PREPARED <i>Name, Position /</i>	REVIEWED <i>Name, Position /</i>	APPROVED <i>Name, Position /</i>	APPROVAL DATE <i>DD-MMM-YYYY</i>
1	Initial release. Replaces Laird Group Policy "Supplier Code of Conduct" (updated Mar 2020)	Inna Nebylicyna, Director of Sourcing	Frank Jassner, VP of Global Operations / David Stephenson, HRD / Ingo Peper, CFO	Karine Brand, CEO	22-Jul-2022
1.1	Position title corrected in Revision Control section for Rev 1.	Joanne Mayo, Global Quality Systems Manager	n/a	David Stephenson, HRD	28-Jul-2022
2	Change of the documentation number from LTS to G, change of the company logo and name. Linked documents numbers updated.	Michaela Pavlu, Global Quality Systems Engineer	Ingo Peper, (CFO)	David Stephenson, Director of Human Resources	05-May-2025

1.0 Purpose/scope:

- 1.1** Tark Thermal Solutions expects all employees to act professionally, honestly, morally, ethically, with integrity and lawfully in all their dealings within Tark Thermal Solutions and with our business partners, customers and other stakeholders. Tark Thermal Solutions also expect our business partners to uphold the same commitment and principles. This Supplier Code of Conduct sets out the business standards expected from suppliers of goods and services to Tark Thermal Solutions.

2.0 Responsibilities:

- 2.1** Tark Thermal Solutions suppliers are responsible for ensuring that any current or new employees or agents of their corporation that interact or do business with Tark Thermal Solutions understands TTS expectations and standards. Suppliers are responsible for ensuring that their employees and vendors are aware of the business conduct and ethics expectations of Tark Thermal Solutions and ensure they follow them.
- 2.2** From time to time we may require our business partners to confirm in writing that they have complied with the expectations in this Supplier Code of Conduct and any applicable laws. Failure to submit confirmation when requested may result in termination of the business relationship. Our Suppliers are expected to report any violations of this Supplier Code of

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Conduct to Tark Thermal Solutions promptly whether violations are from Supplier or vendors and / or Tark Thermal Solutions employees. Confidentiality will be strictly maintained.

3.0 Associated Documents/References:

- 3.1** G-MGMT-PL-202 Human Trafficking and Anti-Slavery Policy

4.0 Definitions:

- 4.1** MSA – Master Supplier Agreement
4.2 HRD – HR Director

5.0 Standards:

5.1 General Business Philosophy

- 5.1.1 Tark Thermal Solutions business philosophy to doing business with external partners is as follows:
- 5.1.1.1 Strict compliance with the law
 - 5.1.1.2 Respect for competition
 - 5.1.1.3 No actual or perceived conflicts of interest
 - 5.1.1.4 Compliance with Tark Thermal Solutions business and ethics standards set out in this document and any referenced documents.
- 5.1.2 In addition, we also encourage our suppliers to meet the Responsible Business Alliance (RBA) Code of Conduct in its entirety including its elements related to Labor, Health & Safety, Environment, Management System and Ethics.
<http://www.responsiblebusiness.org/code-of-conduct/>

6.0 Key Standards of Business Conduct with Suppliers:

6.1 Family Members Doing Business with Tark Thermal Solutions Employees

- 6.1.1 Tark Thermal Solutions employees may not engage in transactions on behalf of the company with suppliers who are family members or have a substantial beneficial interest where they serve as a trustee or in a fiduciary capacity.

6.2 Suppliers must sign Tark Thermal Solutions Non-Disclosure Agreement (NDA)

- 6.2.1 A prerequisite to doing business with Tark Thermal Solutions is accepting and signing a copy of our NDA as well as other relevant required commercial agreements. This document must be signed and agreed before any confidential technical or business information can be exchanged between companies.

6.3 Business Awards and ‘Kickbacks’

- 6.3.1 Tark Thermal Solutions treats all potential suppliers fairly, openly and considers all

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interested/qualified suppliers when we purchase goods or services based on their ability to meet our business needs. We demand fair, transparent negotiation and bidding processes, conducted in the utmost professional manner when working with our procurement and sourcing representatives.

- 6.3.2 Under no circumstances are suppliers allowed to offer ‘kickbacks’ or rebates to try to entice a Tark Thermal Solutions employee to choose a supplier nor should any employee of Tark Thermal Solutions request such treatment from you in order to earn our business. A kickback refers to any money, fee, commission, credit, gift, gratuity, or item of value or compensation of any kind, which is provided, directly or indirectly, for the purpose of improperly obtaining or rewarding favorable treatment in connection with a contract or relationship from Tark Thermal Solutions.

6.4 Business Gifts

- 6.4.1 Please be aware that all Tark Thermal Solutions employees are required to adhere to strict policies related to gifts and entertainment with suppliers.

6.5 International Corruption Law

- 6.5.1 Our employees are required to abide by international good practice in these matters e.g., the U.S. Foreign Corrupt Practices Act (FCPA) and UK Anti Bribery Act 2010. We expect our suppliers to abide by these same regulations and any other applicable local laws relating to bribery and corruption.

6.6 Counterfeit Components Usage

- 6.6.1 Tark Thermal Solutions is taking action to increase awareness and controls in our supply chain in order to prevent counterfeit components from entering our production processes. We expect our suppliers to implement anti-counterfeit procurement measures and to ensure that they utilize only authorized suppliers and distributors. Tark Thermal Solutions reserves the right, from time to time, to audit its suppliers’ preventive measures in this area.

6.7 Supply Chain Security

- 6.7.1 Tark Thermal Solutions is committed to assessing, managing, and improving its supply chain security. It is Tark Thermal Solutions intent to work with their business partners as a team to improve supply chain security practices. We expect your company will comply with the U.S. Customs “C-TPAT: Customs-Trade Partnership Against Terrorism” minimum security requirements. Further information and updates to these requirements can be found at the U.S. Customs and Border Protection’s website at: <https://www.cbp.gov/border-security/ports-entry>

6.8 Trade Compliance

- 6.8.1 It is Tark Thermal Solutions policy to fully comply with all applicable import, export, customs and trade compliance regulations, licensing requirements, and other relevant U.S. and international laws. Suppliers are required to adhere to all governmental trade compliance import and export regulations involving Tark Thermal

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Solutions shipments.

6.9 No Forced Labour, Slavery or Human Trafficking

- 6.9.1 Tark Thermal Solutions is committed to eradicating slavery, forced labour and human trafficking from its supply chain. All its direct suppliers are required to comply with Tark Thermal Solutions Human Trafficking and Anti-Slavery Policy (G-MGMT-PL-202 available on request from Tark Thermal Solutions) and by accepting orders certify that they do. The policy requires direct suppliers to impose similar obligations on their suppliers.

6.10 Equal Employment and Human Rights

- 6.10.1 Tark Thermal Solutions is committed to recruiting and selecting applicants for employment solely on the basis of their qualifications and suitability for the position in question. It is Tark Thermal Solutions policy to recruit the most capable person available for each position. Tark Thermal Solutions recognizes the need to treat all employees honestly and fairly, respecting their individual and collective rights. Accordingly, Tark Thermal Solutions expresses its support for the International Labor Organization's eight Core Conventions recognized as being fundamental to the rights of human beings at work. <http://www.ilo.org/global/standards/lang--en/index.htm>

6.11 Restricted Substance Compliance

- 6.11.1 Tark Thermal Solutions is dedicated to ensuring that our operations and products strictly comply with all applicable laws, regulations and customer requirements (including REACH and RoHS) regarding banned, restricted and reportable substances. Tark Thermal Solutions may from time to time issue specific guidance to its suppliers setting out Tark Thermal Solutions standards for banned, restricted and reportable substances within our products and packaging. In order to conduct business with Tark Thermal Solutions, suppliers are, upon request, expected to declare the material content of products delivered to Tark Thermal Solutions and to certify compliance with all requirements contained within applicable regulations and within any guidance issued by Tark Thermal Solutions or contained in purchase orders, drawings or purchased part specifications.

6.12 Human Rights in Minerals Mining in Central Africa (Conflict Minerals)

- 6.12.1 Human rights violations related to the trade in minerals from the conflict zones in the Democratic Republic of Congo (DRC) are a focus of Tark Thermal Solutions supply chain and environmental responsibilities. Tark Thermal Solutions requires its suppliers not to source materials defined in the Dodd-Frank Act and their derivatives (including gold, tin, tantalum and tungsten metals) from the conflict zones in the Democratic Republic of Congo (DRC). We expect suppliers to conduct their worldwide operations in a manner that does not result in labor or human rights violations, including operations that contribute to the direct financing of armed conflict. In order to support this requirement suppliers are required to establish due diligence processes consistent with published guidance in order to make it possible to verify

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whether conflict minerals are contained in products sold to Tark Thermal Solutions and to provide such information to Tark Thermal Solutions on request.

7.0 How to Report an Ethics Concern to Tark Thermal Solutions

- 7.1.1 To report a questionable behavior or possible violation of the Supplier Code of Conduct, Tark Thermal Solutions has a variety of resources available to assist you as our supplier. Suppliers are encouraged to work with their primary Tark Thermal Solutions contact in resolving a business practice or compliance concern. However, Tark Thermal Solutions recognizes that there may be times when this is not possible or appropriate. In such a situation the Supplier should report (see 7.2 below) their concerns to either the TTS Global Sourcing Director TTS.sourcing@Tarkthermal.com and/or the TTS HRD tts.hr@tark-solutions.com and/or to TTS legal team legal.support@tark-solutions.com.

7.2 Reporting of Questionable Behavior and/or Possible Violations

- 7.2.1 When reporting a concern, suppliers or vendors should indicate that they are reporting on behalf of “Tark Thermal Solutions” rather than their supplier company name.
- 7.2.2 Provide specific information about which Tark Thermal Solutions site or organization is associated with the concern.
- 7.2.3 Your concern will be held in complete confidence, and you can remain anonymous if you choose. However, providing contact information will help us investigate your concern.
- 7.2.4 Tark Thermal Solutions will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought our advice or has reported questionable behavior and/or a possible violation.

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Tark Thermal Solutions Business Addendum to MSA, or Purchase Order Terms and Conditions

Suppliers wishing to conduct or continue to do business with Tark Thermal Solutions must sign, or electronically accept, to acknowledge that they have read the Tark Thermal Solutions Supplier Code of Conduct; and in doing so, certify that they intend to comply with the principles contained therein and notify those employees involved in conducting business with Tark Thermal Solutions.

_____ **(Supplier Name)** acknowledges they have received, read and accept Tark Thermal Solutions Supplier Code of Conduct and will notify all current and new employees engaging in business with Tark Thermal Solutions regardless of supplier entity location(s), employee function or employee location. By signing below, the signatory confirms that he/she is an authorized signatory of and authorized to legally bind the Supplier.

Supplier Name: _____

Tark Thermal Solutions Account Representative Contact:

Supplier Address: _____

Supplier City, State, County, Postcode: _____

Phone Number(s): _____

Email Address: _____

Signed: _____ **Name:** _____

Title: _____ **Dated:** _____