

# **DMT Solutions Global Corporation (d/b/a BlueCrest) Supplier Code of Conduct**

(October 2024)

## Introduction:

BlueCrest is committed to the highest standards of product quality and business integrity in its dealings with Suppliers and ensuring that working conditions in our supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally and socially responsible.

To ensure our relationships with Suppliers meet and support these expectations, BlueCrest has developed a Supplier Code of Conduct. Accordingly, we require each of our Suppliers to support our Code and to seek to conform to its standards and provisions documented in detail below.

Furthermore, we expect our suppliers to apply these to their extended sources of supply engaged in the production of goods and services for BlueCrest. Failure on the supplier's part to comply with the standards and provisions set forth in our Code may impact business relationships with BlueCrest.

**Dennis LeStrange**

President and CEO

DMT Solutions Global Corporation (d/b/a BlueCrest)

## **Supplier Code of Conduct**

### **DMT Solutions Global Corporation (d/b/a BlueCrest)**

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## **BlueCrest Supplier Code of Conduct**

*BlueCrest has always set high standards for conducting business in a socially and environmentally responsible manner, with sound business ethics, and in compliance with all applicable laws and regulations. In turn, we expect the same commitment from our suppliers.*

*This is why we have established the DMT Solutions Global Corporation d/b/a BlueCrest (herein referred to as "BlueCrest") Supplier Code of Conduct. These principles speak to the commitments we make to our customers, our commitment to compliance with law, and our legacy of innovation and relationships built on trust and personal responsibility. We will consider these principles in our selection of suppliers and will actively monitor their compliance. In turn, it is expected that our Suppliers will apply these standards to the suppliers they work with in the delivery of goods and services for BLUECREST.*

### **Forced Labor**

BLUECREST Suppliers will not use forced or involuntary labor of any type (e.g., forced, bonded, indentured or involuntary prison labor). BLUECREST Suppliers will not use child labor. The term "child" refers to any person employed under the minimum age for employment in the country where work is performed. We support the use of legitimate workplace apprenticeship programs which comply with all applicable laws and regulations.

### **Wages, Working Hours, and Working Conditions**

BLUECREST Suppliers will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits. Workers should not be required to work more than 60 hours per week, including overtime, except in extraordinary business circumstances with their consent. Employees should be allowed at least one day off during a seven-day week.

### **Nondiscrimination**

BLUECREST Suppliers will not discriminate in hiring and employment practices on grounds of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation, or disability, subject to local law.

### **Respect and Dignity**

BLUECREST Suppliers will treat all employees with respect and will not use corporal punishment, threats of violence or other forms of physical coercion or harassment. Supplier should have a policy that prohibits inappropriate conduct and a process for employees to report such conduct for Supplier's investigation and resolution.

### **Health and Safety**

BLUECREST Suppliers will provide their employees with a safe and healthy workplace in compliance with all applicable laws, regulations, and sound industry practice. Consistent with these obligations, BLUECREST Suppliers must have and implement effective programs that encompass life safety, incident investigation, chemical safety, ergonomics, and other relevant protective elements.

### **Protection of the Environment**

BLUECREST Suppliers will operate in a manner that is protective of the environment. At a minimum, Suppliers must comply with all applicable environmental laws, regulations, and sound industry practice, such as requirements regarding chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits, and environmental reporting. Suppliers must also comply with any additional environmental requirements as called for in BlueCrest's design and product specifications, and contract documents.

### **Legal and Ethical Dealings**

BLUECREST Suppliers will comply with all applicable laws and regulations in all locations where they conduct business, especially with respect to strict compliance with all laws and regulations on bribery, corruption, and prohibited business practices. BLUECREST expects suppliers to conduct their business in accordance with the highest ethical standards. In all cases in which BLUECREST requirements are more stringent than local legal requirements, Suppliers are required to comply with the more stringent BLUECREST requirements.

### **Product Compliance**

BLUECREST Suppliers will manufacture our parts and products in a manner such that adverse or potentially adverse impacts on people, communities, and the environment will be minimized and eliminated. This includes meeting Environmental Compliance regulatory requirements

such as REACH, RoHS and WEEE, investigating the origins of “3TG metals” covered under the Dodd-Frank Act, and providing requested environmental product data.

### **Personal Data Protection & Data Privacy**

BLUECREST Suppliers shall respect the rights of data subjects to data privacy, and only process personal data to the extent and in a manner consistent with applicable data protection and privacy laws. Suppliers shall maintain appropriate technical and organizational measures to protect personal data and shall ensure that personal data processed and stored is sufficient, adequate, accurate and updated, and is not stored longer than necessary for its approved purpose.

### **Reporting and Compliance**

BLUECREST Suppliers must promptly report any violations of this code of conduct and cooperate fully with investigations and audits conducted by BlueCrest. Failure to comply with this code of conduct may result in termination of the business relationship with the supplier.

#### **Non-Compliance Reporting**

Violations of this Code of Conduct should be reported to 1-800-461-9330 or to BLUECREST’s confidential Ethics and Compliance Portal.

### **Continuous Improvement**

BLUECREST Suppliers are expected to continuously monitor and improve their performance in line with the principles of this Code of Conduct.

## BlueCrest Supplier Code of Conduct

### Code 1 Forced Labor

BLUECREST Suppliers will not use forced or involuntary labor of any type (e.g., forced, bonded, indentured or involuntary prison labor). BLUECREST Suppliers will not use child labor. The term “child” refers to any person employed under the minimum age for employment in the country where work is performed. We support the use of legitimate workplace apprenticeship programs which comply with all applicable laws and regulations.

#### Critical Benchmarks

BLUECREST Supplier Code of Conduct bans forced or illegal child labor in any form by suppliers. All employment must be voluntary and legal. Suppliers must comply with all applicable child labor laws, including those relating to minimum age limits, limitations of hours worked, and prohibitions against certain types of work.

#### Forced or prison labor

Forced or prison laborers are prohibited from employment if they are constrained to work as a requirement of the sentence and without compensation. Forced or prison labor occurs most often where the supplier is using a government or military-controlled agency to provide or arrange for the hiring of workers.

#### Indentured and bonded labor

Indentured labor refers to employees who are forced, physically or by intimidation, to perform work against the employee’s will. Bonded labor refers to situations where employees work to pay a debt, which may have been created by another person.

#### Child labor

Many countries restrict the number of hours persons between ages 13 and 18 can work. Young workers may also be barred from performing certain types of work, such as hazardous work, night work or overtime work. Apprentice programs are regulated by law in most countries, with specific limits on number of hours worked, duration of training period, number of times the same worker can be classified as a trainee, and requirements for post-apprenticeship hiring. Suppliers must conduct their labor practices in strict compliance with International Labor Organization (ILO) Convention No.138

(Minimum Age for Admissions to Employment and Work and No. 182 (Worst Forms of Child Labor).

#### Examples of Actual or Potential Noncompliance

- Any type of forced, prison, indentured, or bonded labor.
- Unreasonable restrictions placed on basic liberties (bathroom, drinking water, use of medical facilities, etc.).
- Withholding government issued identification, passports or work permits without employee consent.
- Use of workers below the legal age of employment.
- Incomplete or missing age documentation records verifying the age of all employees when workers appear to be of unlawful age within the facility.

#### Examples of Good Management Practices

- Supplier’s hiring practices, and those of any labor recruiters, prohibit forced or bonded labor.
- Supplier actively verifies compliance.
- Supplier establishes a written set of instructions for all subcontractors and labor recruiters that prohibit forced labor and supplier requires certification of compliance.
- Government-issued identification, passports or work permits are not withheld from the employee.
- Supplier verifies the age of each worker prior to employment.
- Supplier ensures that young workers are only employed within the legally specified number of hours.
- Supplier has a clear program for hiring, training, and promoting apprentices.

## BlueCrest Supplier Code of Conduct

### Code 2 Wages, Working Hours, and Working Conditions

BLUECREST Suppliers will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits. Workers should not be required to work more than 60 hours per week, including overtime, except in extraordinary business circumstances with their consent. Employees should be allowed at least one day off during a seven-day week.

#### Critical Benchmarks

All employees are paid the legal minimum wage applicable in the country of operation. Workers must be compensated for overtime hours at the legally mandated premium rates, or where such rates do not exist, payment for overtime hours must be at least equal to the regular hourly wage. Employees should receive all statutory benefits mandated by law, including but not limited to pension benefits, annual leave, and holidays (**Note:** Unless specified otherwise by local legal requirements, this provision may not apply to exempt employees, including those in executive, managerial, or professional positions). Establish a weekly work schedule compliant with local legal limits on regular working hours. Provide workers with advance notice that overtime hours may be necessary (**Note:** Unless specified otherwise by local legal requirements, this provision may not apply to exempt employees, including those in executive, managerial, or professional positions).

Suppliers are expected to share BLUECREST's commitment to Human Rights and particularly to treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, provide equal opportunity in the workplace as set forth in the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN Global Compact Principles, and the International Labor Office (ILO) Core Labor Standards.

Suppliers are expected to operate in consideration of the International Labor Organization (ILO) standards regulating working, resting hours, maximum consecutive days of work and annual leave. Hours worked beyond the normal work week shall be voluntary and suppliers must provide a rest period of at least twenty-four (24) consecutive hours in every seven (7)-day period to all their employees.

Overtime must be voluntary, must not be demanded on a regular basis and must always be compensated at a premium rate.

#### Examples of Actual or Potential Noncompliance

- Lack of compliance with minimum wage and overtime guidelines.
- Incorrect pay records.
- Miscalculation of wages.
- Miscalculation of benefits.
- Improper or unauthorized wage deductions.
- Compensation not paid directly to workers, except as required by law or by voluntary employee authorization.
- Nonpayment or late payment of wages.
- Failure to provide employer/employee mandated benefits.
- Failure to pay mandated compensation withholdings to the appropriate government Agency.
- No payroll receipts provided to workers.
- Missing, incorrect, or no time records.
- Non-payment for actual time worked (work done off the clock).
- Not providing mandated rest day(s), holiday(s), and vacations day(s).
- Denial of mandated meal and rest breaks.

#### Examples of Good Management Practices

- Employees are provided payroll receipts that clearly indicate compensation, including overtime hours and overtime compensation levels.
- Workers are educated on wage/pay practices.
- Workers are encouraged through surveys to suggest changes/improvements in benefits.
- Supplier maintains and applies systems to pay workers for overtime in accordance with applicable law.
- Supplier has a process for identifying capacity restraints, to minimize overtime hours

## BlueCrest Supplier Code of Conduct

### Code 3 Nondiscrimination

BLUECREST Suppliers will not discriminate in hiring and employment practices on grounds of race, ethnicity, creed, color, religion, age, sex, national origin, disability status, marital or familial status, genetics, pregnancy, veteran status, sexual orientation, gender identity or expression, or any other characteristic for which discrimination is prohibited by law

#### Critical Benchmarks

BLUECREST Supplier Code of Conduct stipulates that job candidates and/or employees be judged solely based on their ability to perform the job they are applying for or currently engaged in. This provision applies to all employment decisions, including recruitment, hiring, training, promotion, and termination.

#### Examples of Actual or Potential Noncompliance

- Discrimination in hiring, employing, or terminating workers.
- Substantial differences in the demographics of Supplier's workforce compared to other similar facilities in the local vicinity may indicate discriminatory practices.
- Variations in pay, benefits or promotion based on grounds of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, political affiliation, or disability.
- Health tests, pregnancy testing, or contraception used as a condition of employment.
- Pregnant workers performing dangerous tasks.
- Withholding mandated benefits such as maternity leave.
- Lack of written hiring and employment policies.
- Lack of feedback system between employees and management.

- Periodically training managers and employees on nondiscrimination.
- Conducting interviews to determine that employees are being fairly compensated, including whether women workers are allowed to take maternity leave.
- Creating written job descriptions that focus solely on "occupational qualifications," not personal characteristics.
- Taking proactive action to hire and promote a diverse workforce.
- Management communicates its written policies on nondiscrimination to its employees.

#### Examples of Good Management Practices

- Periodically reviewing hiring practices to determine that there is no prohibited discrimination.
- Hiring agents and Supplier management who are trained in nondiscrimination and applicable nondiscrimination laws.



## BlueCrest Supplier Code of Conduct

### Code 4 Respect and Dignity

BLUECREST Suppliers will treat all employees with respect and will not use corporal punishment, threats of violence or other forms of physical coercion or harassment. Supplier should have a policy that prohibits inappropriate conduct and a process for employees to report such conduct for Supplier's investigation and resolution.

#### Critical Benchmarks

BLUECREST Suppliers must not:

Engage in harassing or physically abusive discipline.

Act in a threatening way towards employees.

Submit employees to demeaning conditions.

#### Examples of prohibited abuse

Threats to harm an employee's physical well-being. Physical contact intended to harass, hurt, or harm, whether or not considered to be disciplinary action. Comments which are understood by the employee to be harassing or demeaning. Harassment based on race, religion, age, nationality, social or ethnic origin, sexual orientation, gender identity or expression, political affiliation, or disability. Sexual harassment of any kind. Discipline resulting in the withdrawal of basic physical comforts provided other workers.

#### Examples of Actual or Potential Noncompliance

- Evidence of physical or sexual abuse or harassment.
- Evidence of wage deductions or monetary fines used as discipline.
- Lack of written policies prohibiting physical or sexual abuse or harassment.
- Lack of feedback system between employees and management.

#### Examples of Good Management Practices

- Written policies and practices are in place prohibiting harassment and abuse.
- Supplier has established a training program for management and supervisors delineating policies and

- disciplinary actions are clearly documented.
- All disciplinary actions are non-physical and clearly documented.
- The supplier has established a communication system or suggestion box where workers can raise issues of concern including treatment by their supervisors or coworkers.
- Supplier has a program providing for investigation of worker concerns about illegal or unethical conduct and resolves substantiated concerns with appropriate discipline according to its policies and practices.
- Management communicates its written policies on respect and dignity to its employees.



## BlueCrest Supplier Code of Conduct

### Code 5 Health and Safety

Suppliers will provide their employees with a safe and healthy workplace in compliance with all applicable laws, regulations and sound industry practice. Consistent with these obligations, BLUECREST Suppliers must have and implement effective programs that encompass life safety, incident investigation, chemical safety, ergonomics, and other relevant protective elements.

#### Critical Benchmarks

BLUECREST Suppliers are required to: Comply with all applicable laws regarding health and safety in the workplace. Comply with all legal regulations regarding health and safety in residential facilities, where provided. Provide employees with a safe and healthy work environment and with appropriate health and safety training. Effectively implement any program necessary to identify and mitigate workplace hazards. Establish an appropriate Health and Safety Management System (e.g., OSHAS 18001 and the ILO Guidelines on Occupational Safety and Health or equivalent), including policies aimed at protecting the health, safety and welfare of employees, contractors, visitors and others who may be affected by their activities by striving to eliminate fatalities, work-related injuries, health impairment and limiting exposure to safety hazards.

- Lack of fall protection above 6 feet when required.
- Poor or inadequate ventilation, lighting, and temperature controls.
- Missing or inadequate first aid supplies or other provisions for emergency care.
- Unsanitary or insufficient toilets, hand washing or canteen areas.
- Routine building and machine maintenance not performed.
- Repetitive lifting or unusually heavy objects or work requiring extremely awkward postures.
- Unstable or makeshift scaffolding.
- Trash and rubbish accumulation or other signs of grossly inadequate housekeeping.
- Electrical hazards (e.g., bare wires, exposed electrical panels, ungrounded equipment, overloaded circuits).
- Uncontrolled confined spaces (e.g., tanks, pits, vaults, manholes) where there could be potentially hazardous atmospheres, insufficient oxygen levels, etc.

#### Examples of Actual or Potential Noncompliance

- Blocked, locked, or no emergency exits.
- Immediate fire hazards – (e.g. frayed electrical wiring, open flames, flammable vapors, etc.).
- Inadequate fire extinguishers or firefighting equipment.
- Blocked aisles and passageways.
- No evacuation plan, signage or drills.
- Missing exit signs; Insufficient or no emergency lighting.
- No fire alarm system or public address system.
- No drinkable water.
- Inadequate or missing machine guards.
- Lack of personal protective equipment or improper use.
- Unsafe worker exposure to hazardous chemicals or substances.
- Hazardous chemicals or substances that are without proper labels and datasheets.
- Missing handrails/guardrails on stairwells, elevated walkways or platforms.

#### Examples of Good Management Practices

- A management system has been implemented to identify and control potential hazards and to strive for continuous improvement (e.g., OSHA S 18001 or ISO 45001).
- A health and safety manager has been appointed to oversee compliance.
- Employees are involved in safety programs and management leadership is evident.
- Health and safety education is provided during initial orientation and on an ongoing basis.
- Workplace incidents are reported and investigated, and action taken to minimize the potential for future occurrence.
- Formal and informal management self-assessments are completed on a routine basis.
- Health and safety trends (e.g., incidents, employee perceptions, regulatory deficiencies) are monitored and properly addressed.
- New equipment, processes and facilities are reviewed for potential health and safety risks prior to initiation.

- Emergency evacuation drills are conducted regularly.

**Examples of Good Management (continued)**

- Emergency response capabilities are appropriate to the risk.
- Health and safety professionals are consulted for guidance and evaluation.

## BlueCrest Supplier Code of Conduct

### Code 6 Protection of the Environment

BLUECREST Suppliers will operate in a manner that is protective of the environment. At a minimum, suppliers must comply with all applicable environmental laws, regulations and sound industry practices, such as requirements regarding chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits and environmental reporting. Suppliers must also comply with any additional environmental requirements called for in BlueCrest's design and product specifications, and contract documents.

#### Critical Benchmarks

BLUECREST Supplier Code of Conduct calls for suppliers to conduct their operations in ways that are environmentally responsible and in compliance with all applicable environmental laws, regulations, and standards. Suppliers are also required to meet any additional requirements specific to their work with BLUECREST. The applicability of compliance will vary depending on the product or service being provided to BLUECREST and the associated operations. Suppliers are expected to reduce their climate change impact with a monitored roadmap. Suppliers are expected to improve their efficiency of energy usage, maximize transition to renewable energy sourcing. Suppliers are expected to optimize logistic practices (routes, modes...). Suppliers shall ensure that all their operations, including their own supply chain, comply with all applicable environmental, health and workplace safety laws and regulations. Suppliers are asked to cooperate with BLUECREST by providing evidence upon request of compliance with environmental regulations such as, but not limited to, EU Regulation EC/1907/2006 REACH, EU Directive 2011/65/EU RoHS and WEEE Directive 2012/19/EU.

#### Examples of Actual or Potential Noncompliance

- Supplier does not have a process to identify applicable laws, regulations, and standards.
- Supplier does not have appropriate records documenting compliance to the law, such as required environmental monitoring, reporting, permits, etc.
- Supplier cannot demonstrate that it is meeting BLUECREST's environmental requirements in design and product specifications or contract documents.
- Employees are not adequately trained on proper handling, use and storage of hazardous waste and on emergency procedures.

- Supplier's chemical and waste management/pollution control systems and processes are not in compliance with applicable environmental laws, regulations, standards and sound industry practices.  
Examples:
  - unlawful disposal of chemicals or waste;
  - uncontrolled air emissions;
  - discharging untreated wastewater;
  - chemicals are not being properly used, managed, stored and disposed of;
  - hazardous and combustible materials and waste are not clearly marked and/or properly stored;
  - use of banned substances;
- Improper use of pesticides or herbicides.
- Supplier has received environmental violations (If the violations are minor and have been appropriately addressed, they would not represent an issue.).

#### Examples of Good Management Practices

- Supplier has a complete and effective environmental management system (written policies, processes, and requirements for environmental protection and pollution prevention/source reduction) that is in accordance with laws, regulations, and standards.
- Supplier conducts periodic environmental audits to confirm that its operations are environmentally responsible and are conducted in accordance with laws, regulations, and standards.
- Supplier's staff and contractors have the necessary skills and training so they are familiar with the supplier's environmental management system and their role in meeting environmental requirements.
- Supplier is proactive with respect to environmental protection and employees are encouraged and comfortable with raising issues of environmental concern without fear of retaliation.

### **Examples of Good Management Practices (continued)**

- Supplier has obtained certification to the ISO 14001 environmental management system standard or equivalent.
- Supplier has programs for the efficient use and conservation of energy.
- Supplier has programs for the efficient use and conservation of water.
- Supplier has programs for the efficient use of materials, including waste reduction, material reuse, and recycling.
- Supplier has programs to review environmental performance of its supply chain and acts meaningfully to improve performance throughout.

## BlueCrest Supplier Code of Conduct

### Code 7 Legal and Ethical Dealings

BLUECREST Suppliers will comply with all applicable laws and regulations in all locations where they conduct business, especially with respect to strict compliance with all laws and regulations on bribery, corruption and prohibited business practices. BLUECREST expects suppliers to conduct their business in accordance with the highest ethical standards.

#### Critical Benchmarks

BLUECREST Supplier Code of Conduct requires that Suppliers:

Know and comply with all applicable legal requirements, including U. S. import, export and trade laws and similar laws of the countries in which Supplier operates. Not import from or export to countries subject to country-wide sanctions (i.e. international economic or trade sanctions adopted, administered or enforced by the United Nations Security Council, Authorities of the United States or European Union); Review internal processes and procedures for legal compliance and ethics issues. Not offer or provide cash or non-cash gifts to any BLUECREST employee, or to anyone else on BLUECREST's behalf, to influence them to take or not take a course action or for any other improper purpose; Any gifts, meals, or entertainments must comply with applicable laws and regulations. Avoid any conflict of interest between Supplier and BLUECREST and make timely disclosure of all such actual or potential conflicts to BLUECREST. Comply fully with all anti-bribery laws, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. Maintain adequate physical and electronic security for all confidential information relating to BLUECREST. Only use subcontractors that do not violate ethical standards through bribes, kickbacks or other similar improper or unlawful activity. Not represent themselves to be agents or representatives of BLUECREST. Not enter into formal or informal anti-competitive arrangements that fix prices, collude, rig bids, limit supply or allocate/control markets. Not exchange past, current, or future competitively sensitive information pertaining to the business they do with BLUECREST (including, but not limited to, pricing information) or with BLUECREST competitors.

- No postings of legally required wage, benefit, and health information.
- Maintaining inadequate, out-of-date, or missing process and procedure documentation.
- Ineffective monitoring of internal compliance performance.
- Failure to review and act upon complaints about noncompliance from employees or others.

#### Examples of Good Management Practices

- Supplier senior management supports compliance objectives and practices and enforces them.
- Supplier has management representatives who are responsible for monitoring the Suppliers' compliance.
- Supplier cooperates with monitoring government officials responsible for reviewing compliance practices.
- Encourage all employees to report suspected noncompliance to management.
- Supplier discloses all potential and actual conflicts of interest to BLUECREST (e.g., if a Supplier employee has a relationship with a BLUECREST employee who can make decisions affecting Supplier's business).
- Supplier follows written policies and guidelines on conflicts of interest, giving and receiving of gifts, business trips, entertainment, use of representatives and agents, and facilitation payments that are in accordance with law.
- Supplier has generally acceptable accounting policies, procedures, and record keeping.
- Supplier conducts periodic financial audits to confirm that its accounts are in order.
- Supplier staff and contractors are educated so they are aware of their ethical and legal requirements and Supplier's standards.
- Create clear communications channels so that employees are comfortable with reporting, and are encouraged to report, violations of law or Supplier policy.
- Have and follow policies that prohibit retaliation for employee reporting.

#### Examples of Actual or Potential Noncompliance

## BlueCrest Supplier Code of Conduct

### Code 8 Product Compliance

BLUECREST Suppliers will manufacture our parts and products in a manner such that adverse or potentially adverse impacts on people, communities, and the environment will be minimized and eliminated. This includes meeting Environmental Compliance regulatory requirements such as REACH, RoHS and WEEE, investigating the origins of “3TG metals” covered under the Dodd-Frank Act, and providing requested environmental product data.

#### Critical Benchmarks

BLUECREST Supplier Code of Conduct requires that suppliers:

Understand and comply with all applicable federal, state, local and international environmental laws, requirements and regulations, including but not limited to the Directive 2011/65/ EC of the European Parliament the restriction of the use of certain hazardous substances in electrical and electronic equipment (ROHS2); (ii) the Directive 2002/96/EC of the European Parliament Waste Electrical and Electronic Equipment (WEEE) (iii) the Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH); and (iv) BLUECREST environmental specifications and standards (packaging, labeling, etc.) and fully cooperate with BlueCrest’ efforts to comply with those requirements. Upon request, certify that the products you supply to BLUECREST are manufactured in accordance with applicable laws, regulations and requirements. This includes surveys, data requests, etc. Be responsible for all registration and other REACH requirements for chemical products by either importing the product into the EU and supplying the product to BlueCrest as a downstream user or appointing an Only Representative to fulfill all REACH obligations. Warrant that any materials returned by BLUECREST will be disposed of, recycled, recovered, or reclaimed and not landfilled, in accordance with all applicable international, federal, state, local and European Union environmental laws and regulations of the country of material dispositioning.

- Not providing a Certificate of Compliance for RoHS.
- Not undertaking an investigation into the origins of covered minerals.
- Not responding to Compliance Database information requests/surveys.
- Providing false information to BlueCrest regarding the composition of products supplied to BLUECREST or Supplier’s compliance with applicable laws, regulations or contractual requirements.
- Not allowing BLUECREST to audit a facility or review requested files associated with BLUECREST business.

#### Examples of Good Management Practices

- Agree upon notice from BLUECREST, at reasonable intervals, to permit representatives of BLUECREST to visit and audit, at BLUECREST’s expense, the environmental, health and safety records, programs, data and procedures.
- Provide products and services that meet regulatory requirements and are safe to use.
- Supplier strives to reduce or eliminate waste of all types at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, and recycling and reusing materials.
- Supplier responds to regulatory information requests in a timely manner.
- Supplier completes investigation of products, materials provided to BLUECREST that may contain 3TG metals and determines whether those substances originate in areas of conflict.
- Supplier responds to BlueCrest Conflict Minerals survey and attests to the origin of any 3TG metals contained in Supplier’s products. Suppliers shall support efforts to eradicate the use of any conflict minerals, which directly or indirectly finance, or benefit armed groups that are perpetrators of serious human rights abuses.
- In the event that the material ‘chain of custody’ supplied is “indeterminable” or otherwise unknown, the Supplier is expected to either attain the appropriate certifications or phase out that source of mineral.

#### Examples of Actual or Potential Noncompliance

- Not responding to Product Compliance Database information requests.

### **Examples of Good Management Practices(continued)**

- Supplier identifies and manages chemicals and other materials posing a hazard if released to the environment to ensure their safe handling, movement, storage, use, recycling and reuse, and disposal.



## BlueCrest Supplier Code of Conduct

### Code 9 Data Protection and Privacy

BLUECREST Suppliers shall respect the rights of data subjects to data privacy, and only process personal data to the extent and in a manner consistent with applicable data protection and privacy laws. Suppliers are committed to maintain appropriate technical and organizational measures to protect personal data and shall ensure that personal data processed and stored is sufficient, adequate, accurate and updated, and is not stored longer than necessary for its approved purpose.

#### Critical Benchmarks

BLUECREST Supplier Code of Conduct requires that suppliers:

Understand and comply with all applicable federal, state, local and international data protection and privacy laws, requirements and regulations.

Suppliers must know and comply with all applicable data protection and privacy laws and regulations in all locations where they conduct business, including but not limited to GDPR, CCPA, and similar laws. Suppliers are required to regularly review internal processes and procedures to ensure compliance with legal requirements and ethical standards related to data protection and privacy.

Suppliers must avoid any conflicts of interest between themselves and BLUECREST regarding data protection and privacy matters. Any actual or potential conflicts must be disclosed to BLUECREST in a timely manner.

Suppliers are required to implement appropriate technical and organizational measures to ensure data security and privacy.

Suppliers must maintain adequate physical and electronic security measures to safeguard all confidential information relating to BLUECREST, including personal data, from unauthorized access, disclosure, alteration, and destruction.

Suppliers must only engage subcontractors that adhere to ethical standards and do not engage in activities that compromise data protection and privacy, such as bribes, kickbacks, or other unlawful activities.

Suppliers must not represent themselves to be agents or representatives of BLUECREST without prior written consent from BLUECREST.

Suppliers and their subcontractors, suppliers or other service providers, shall comply with (i) the European Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR); (ii) the laws and regulations adopted to implement the GDPR and (iii) any other applicable regulation (including laws, rules, governmental requirements, codes as well as international, federal, state, provincial laws).

Suppliers must respect and protect the intellectual

property rights of BLUECREST and any third parties (including but not limited to software, patents, invention, design, documentation) in particular by forbidding the copy, use or disclosure of such intellectual property rights without prior authorization. The transfer of technology and know-how is to be done in a manner that protects intellectual property rights. Data must not be disclosed, made available or used for any purposes other than those specified by BLUECREST.

#### Examples of Actual or Potential Noncompliance

- Failure to implement adequate security measures to protect confidential data.
- Mishandling of personal data leading to breaches of data protection laws.
- Failure to disclose conflicts of interest related to data protection matters.

#### Examples of Good Management Practices

- Agree upon notice from BLUECREST, at reasonable intervals, to permit representatives of BLUECREST to visit and audit, at BLUECREST's expense, the data protection and privacy policies and procedures.
- Regular audits and assessments of data protection measures.
- Prompt response to data breach incidents with appropriate measures to mitigate harm.
- Comprehensive employee training programs on data protection and privacy.

## BlueCrest Supplier Code of Conduct

### Code 10 Reporting and Compliance

BLUECREST Suppliers must promptly report any violations of this code of conduct and cooperate fully with investigations and audits conducted by BlueCrest. Failure to comply with this code of conduct may result in termination of the business relationship with the supplier.

#### Critical Benchmarks

BLUECREST Supplier Code of Conduct requires that: Suppliers must comply with established reporting procedures for any suspected noncompliance with legal requirements, including data protection and privacy laws, and internal policies.

Suppliers are required to promptly report any instances of noncompliance with applicable laws, regulations, or company policies to the appropriate authorities within BLUECREST.

All reports of noncompliance must be treated confidentially to protect the identity of the reporter and prevent retaliation.

Suppliers must adhere to policies that prohibit retaliation against individuals who report noncompliance incidents in good faith.

Suppliers are expected to fully cooperate with any investigations conducted by BLUECREST into reported incidents of noncompliance.

Suppliers must maintain accurate records and documentation related to reported incidents of measures as necessary. Suppliers must escalate reports of serious noncompliance or breaches of legal or ethical standards to appropriate higher authorities within BLUECREST for further action.

Supplier must not seek to gain an advantage of any kind by acting fraudulently, deceiving people, making false claims or allowing anyone else representing them to do so. This includes

defrauding or stealing and any kind of misappropriation of property or information. noncompliance, including details of the incident, actions taken, and outcomes.

In the event of noncompliance, suppliers must take immediate corrective actions to address the issue and prevent recurrence. They should also cooperate with BLUECREST to implement remediation

#### Examples of Actual or Potential Noncompliance

- Failure to report a data breach promptly.
- Deliberate violation of data protection laws.
- Retaliation against employees who report noncompliance incidents.

#### Examples of Good Management Practices

- Encouraging a culture of transparency and accountability within the organization.
- Providing training to employees on reporting procedures and the importance of compliance.
- Implementing anonymous reporting channels to facilitate the reporting of noncompliance incidents.
- Suppliers must maintain open communication channels with BLUECREST regarding the status of reported noncompliance incidents and any corrective actions taken. Regular follow-up and updates should be provided as necessary.

## BlueCrest Supplier Code of Conduct

### Code 11 Continuous Improvement

BLUECREST Suppliers are expected to continuously monitor and improve their performance in line with the principles of this Code of Conduct.

#### Critical Benchmarks

BLUECREST Supplier Code of Conduct requires that suppliers:

Suppliers must demonstrate a commitment to continuous improvement in their processes, products, and services to enhance quality, efficiency, and effectiveness.

Suppliers are expected to regularly evaluate and review their performance, processes, and practices to identify areas for improvement.

Suppliers should strive to implement industry best practices and standards to improve their performance and deliver better outcomes for BLUECREST.

Suppliers must establish feedback mechanisms to gather input from BLUECREST and other stakeholders to identify areas for improvement.

Suppliers are encouraged to foster a culture of innovation and creativity within their organization to explore new ideas and solutions for continuous improvement.

Suppliers should set specific, measurable, achievable, relevant, and time-bound (SMART) goals for continuous improvement and monitor progress towards achieving them.

Suppliers are encouraged to collaborate with BLUECREST and other stakeholders to exchange knowledge, share best practices, and drive mutual improvement initiatives.

Suppliers must invest in the training and development of their workforce to enhance skills, knowledge, and capabilities that contribute to continuous improvement efforts.

Suppliers should establish performance metrics and benchmarks to measure progress and compare their performance against industry standards and competitors.

Suppliers should foster a culture of continuous improvement throughout their organization by promoting employee engagement, empowerment, and recognition of improvement efforts.

#### Examples of Good Management Practices

- Regularly soliciting feedback from BLUECREST and other stakeholders to identify opportunities for improvement.
- Establishing cross-functional improvement teams to address specific challenges and drive change initiatives.
- Conducting periodic reviews and assessments of performance to track progress and identify areas for further improvement.

#### Examples of Continuous Improvement Initiatives

- Implementation of lean manufacturing practices to reduce waste and improve efficiency.
- Adoption of new technologies to streamline processes and enhance productivity.
- Participation in industry forums and conferences to stay updated on emerging trends and best practices.