



Supplier Code of Conduct

Overview

AssetWatch's officers, directors, employees live by the principles of hard work, exceptional performance, integrity, and fairness. We comply with the law, honor our commitments, act in good faith, uphold ASSETWATCH's values, seek to advance the interests of stakeholders, communicate openly and effectively, and hold ourselves accountable.

Our Supplier Code of Conduct ("Code") as well as our Human Rights & Responsible Materials policies are the foundation for ensuring social, environmental responsibility and ethical conduct throughout our supply chain, from raw materials to the doors of our facilities. The principles outlined in this Code govern our suppliers' (defined as all companies or individuals from which AssetWatch is receiving goods and services as well as their personnel, agents and subcontractors) relationship with AssetWatch and how we expect them to operate their own business. Our suppliers are critical to our success and our ability to provide superior products and services in a responsible manner. As a vital part of our team, we have the same expectations of our suppliers for ethics and compliance as we have for our officers, directors, employees and representatives.

This Supplier Code of Conduct (the "Code") sets forth our expectations for each of our product and service suppliers. This Code is not intended to be an exhaustive list of all ethical and business conduct requirements to be followed by suppliers. The Code represents a minimum standard which our suppliers must follow and where there are differences between the Code and applicable local or national laws and regulations, AssetWatch expects the supplier to follow the stricter standard. AssetWatch will take steps to ensure that our suppliers' business practices are consistent with the Code. This applies both in our selection of new suppliers and in our on-going relationships with our existing suppliers. We expect our suppliers to not just conduct business consistent with this Code, but also to set similar expectations with their own supply chain. AssetWatch understands and expects that our product and service suppliers will have their own internal codes of ethics and conduct. Suppliers are expected to maintain accurate and up-to-date records of their compliance with this Code and all applicable laws and regulations.

You are responsible for ensuring that your directors, officers, employees, representatives, and business partners understand and comply with the expectations set forth in this Code.



General Disclaimer: The expectations set forth in this Code are not intended to conflict with or modify the terms and conditions of your contracts with AssetWatch. If a contract requirement is more restrictive than this Code, you must comply with the more restrictive contract requirement.

This Code applies to all AssetWatch suppliers, subcontractors, and their workers (including permanent, temporary, contract, migrant, and student workers). Suppliers must comply with all applicable laws and regulations; where this Code sets stricter standards, those prevail.

Introduction and General Principles

AssetWatch is committed to ethical, sustainable, and responsible business practices throughout our supply chain. We expect suppliers to uphold human rights, protect the environment, ensure safe working conditions, and conduct business with integrity. This Code is informed by international standards, including the Universal Declaration of Human Rights, ILO Fundamental Conventions, UN Global Compact, and Sustainable Development Goals. Suppliers must conduct due diligence to identify, prevent, and mitigate risks related to labor, EHS, and ethics. Non-compliance may result in corrective action plans, audits, or termination of business relationships. Suppliers are encouraged to extend these principles to their own suppliers and provide access to grievance mechanisms for workers.

A. Labor and Human Rights

Suppliers must respect the rights of all workers and treat them with dignity. This includes prohibiting exploitation and ensuring fair treatment.

1. Prohibition of Forced Labor and Human Trafficking

- Forced labor, slavery, or human trafficking in any form is strictly prohibited. This includes bonded labor (e.g., debt bondage), indentured labor, involuntary prison labor, or any exploitation through threat, force, coercion, abduction, or fraud.
- All work must be voluntary. Workers shall not face unreasonable restrictions on movement within facilities or company-provided housing.
- Suppliers must not engage in trafficking, including transporting, harboring, recruiting, or receiving persons for exploitative purposes.
- Employment terms must be provided in writing, in a language the worker understands, before employment begins (and prior to departure for migrant



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workers). No substitutions or changes are allowed unless to meet local law and improve terms.

- Workers can terminate employment with reasonable notice without penalty.
- Identity documents (e.g., passports, work permits) must not be withheld; workers retain access at all times.
- Workers shall not pay recruitment fees or related costs (e.g., visas, medical exams, travel). If such fees are discovered, they must be reimbursed promptly.
- Suppliers must adhere to the Employer Pays Principle and conduct due diligence on recruitment agencies to prevent trafficking risks.

2. Prohibition of Child Labor

- Child labor is not tolerated at any stage of the supply chain.
- No person under the age of 15 (or the local minimum age for employment or completion of compulsory education, whichever is higher) shall be employed, in line with ILO Conventions 138 and 182.
- Young workers (under 18) must not perform hazardous work that could harm their health, safety, or morals, or interfere with education.
- If child labor is identified, suppliers must provide remediation, including removing the child from work, ensuring their safety and education, and supporting family income if needed.
- Suppliers must verify ages during hiring and participate in industry initiatives to eliminate child labor risks.

3. Working Hours, Wages, and Benefits

- Working hours must comply with local laws, not exceeding 60 hours per week (including overtime) unless exceptional, and workers must have at least one day off per seven-day period.
- Overtime must be voluntary, compensated at a premium rate, and not used excessively.
- Wages must meet legal minimums, cover basic needs, and include benefits (e.g., social security, leave). Deductions must be lawful and transparent.
- Suppliers must provide timely, accurate pay statements in a language workers understand.



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4. Humane Treatment and Non-Discrimination/Non-Harassment

- There shall be no harsh or inhumane treatment, including violence, harassment, intimidation, or corporal punishment.
- Discrimination is prohibited based on race, color, gender, age, religion, disability, sexual orientation, union membership, or other protected characteristics. Hiring, promotion, and termination must be based on merit.
- Reasonable accommodation must be made for workers with disabilities or religious practices.

5. Freedom of Association and Collective Bargaining

- Workers have the right to form, join, or refrain from joining unions and to bargain collectively without retaliation.
- Where restricted by law, alternative means of worker representation must be allowed.

B. Health and Safety (EHS - Health and Safety)

- Suppliers must provide a safe and healthy work environment to prevent accidents, injuries, and occupational illnesses.
- Identify and mitigate hazards through risk assessments, training, and protective equipment.
- Emergency preparedness: Maintain plans for fires, evacuations, and natural disasters; provide first aid and accessible exits.
- Occupational safety: Control exposure to chemicals, noise, and physical demands; ensure machine guarding and safe processes.
- Worker housing (if provided): Must be clean, safe, and meet basic needs with adequate space, sanitation, and security.
- Health programs: Promote worker well-being through hygiene, nutrition, and access to medical care.
- Suppliers must comply with OHSAS 18001/ISO 45001 or equivalent standards and report incidents.

C. Environmental Responsibility (EHS - Environment)

- Suppliers must minimize environmental impacts and promote sustainability.
- Comply with environmental laws; obtain necessary permits and report emissions.



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- **Responsible sourcing:** Ensure materials are sourced ethically, avoiding conflict minerals or deforestation. Conduct due diligence on raw materials (e.g., via traceability systems) to prevent environmental harm or human rights abuses. We recommend using industry-standard reporting (CMRT template).
- **Waste management:** Reduce, reuse, and recycle; properly handle hazardous waste.
- **Pollution prevention:** Minimize air, water, and soil pollution; conserve resources like water and energy.
- **Climate action:** Set targets to reduce greenhouse gas emissions and support biodiversity.
- **Suppliers should align with ISO 14001 and disclose environmental performance.**

D. Ethics and Business Conduct

- **Suppliers must uphold the highest standards of integrity.**
- **Anti-corruption:** No bribes, kickbacks, or improper advantages; comply with anti-bribery laws (e.g., FCPA, UK Bribery Act).
- **Fair competition:** Avoid anti-competitive practices.
- **Intellectual property:** Respect copyrights, trademarks, and trade secrets.
- **Privacy:** Protect personal and business data. We recommend compliance with GDPR, CCPA, or equivalent frameworks.
- **Conflict minerals:** Disclose and avoid sourcing from conflict-affected areas (e.g., per OECD Due Diligence Guidance).
- **Animal welfare (if applicable):** Ensure humane treatment in supply chains.
- **Responsible sourcing extends to ethical procurement, transparency, and avoiding complicity in human rights abuses.**

E. Management Systems

Suppliers must implement systems to ensure compliance and continuous improvement.

- **Risk assessment:** Identify labor, EHS, and ethics risks; conduct regular audits.
- **Training:** Provide worker and management training on this Code.
- **Grievance mechanisms:** Establish confidential channels for reporting issues, with non-retaliation protections.
- **Corrective actions:** Address non-compliances promptly and track progress.
- **Documentation:** Maintain records of policies, audits, and worker contracts.
- **Supplier engagement:** Cascade this Code to sub-suppliers and monitor their compliance.



- **Transparency:** Allow access for audits by our company or third parties; report on performance annually.
- **Information Protection :** You must respect the legitimate proprietary rights and intellectual property rights of AssetWatch and others. You must take proper care to protect sensitive information, including confidential, proprietary and personal information. You should not use such information for any purpose other than the business purpose for which it was provided, unless the owner of the information provided prior authorization.
- **Cybersecurity:** You must safeguard and protect all information we provide to you and information that you generate or develop in support of AssetWatch from unauthorized access, destruction, use, modification or disclosure. You must have risk-based cybersecurity programs designed to mitigate threats to your information systems, products, services, and supply chain.

F. Supply Chain and Quality

Supplier Code of Conduct

You shall develop and implement your own Supplier Code of Conduct code and management systems to support compliance with laws, regulations, and expectations contained in this Code.

Trade Compliance

You are required to comply with U.S. export controls, sanctions, and anti-boycott laws.

Business Partners

- If your contract with AssetWatch prohibits you from assigning, delegating, or subcontracting your obligations, we expect you to strictly comply with this prohibition.
- If your contract with AssetWatch permits you to assign, delegate, or subcontract your obligations or procure products or services from others that will be incorporated in products or services acquired by AssetWatch from you, we expect you to carefully select your business partners, and perform due diligence, audit, and oversight to prevent and detect misconduct. You must flow down the principles set forth in this Code to these business partners and we will hold you responsible for ensuring compliance by your business partners.



Codes of Conduct and Sub-Tier Suppliers

You shall flow down the principles of your code of conduct to entities that provide goods or services to you in support of AssetWatch.

Quality

- Your products and services must be designed, produced, and delivered with the paramount consideration being the safety and health of your employees and customers.
- You must have established quality assurance processes to detect, communicate to AssetWatch, and correct defects to ensure delivery of products and services that meet or exceed contractual quality, legal and regulatory requirements. All required inspection and testing operations must be completed properly by appropriately authorized and qualified individuals, and any required certifications must be completed accurately.

Counterfeit Parts

You shall ensure the existence of methods and processes to: minimize the risk of introduction of counterfeit parts into final products; detect counterfeit parts and materials; provide notification to recipients of counterfeit products; and remove any counterfeit parts from the final products.

By adhering to this Code, suppliers contribute to a resilient, ethical supply chain. We commit to supporting suppliers through capacity building and collaboration. For questions, contact AssetWatch's Supply Chain Team.