



Supplier Code of Conduct
Document No.: HCS-CORP-SC-POL-038
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Version No.: 2.0
Issue Date: 5/30/2022
Issued By: David A Hansen
Authorised By: Steven Knudsen

1. INTRODUCTION/PURPOSE

These guidelines will detail how we expect all our suppliers and subcontractors to share the principles which are expressed in this Supplier Code of Conduct (the “Code”) and to replicate these standards further down the supply chain.

2. SCOPE

This Code applies to all Hoover CS suppliers and subcontractors.

3. DEFINITIONS

The term “Supplier” or “Suppliers” means any person or entity that is the source for goods or services, back to the primary production level.

4. REFERENCES

- Document Control Procedure

5. RESPONSIBILITIES

The VP of Purchasing and the Director of Purchasing are expected to review this document as needed and make any necessary changes.

6. PROCESS

This document will be referenced in Purchase Orders and Terms and Conditions that are provided to each Supplier when a Purchase Order is generated and executed.

7. RECORDS

N/A

8. MONITORING AND REVIEW

Hoover will take appropriate steps to monitor compliance with the Code. These measures may include the use of assessment tools, the implementation of procurement processes to integrate compliance criteria into procurement decisions, the enforcement of contract clauses with Suppliers, and training employees and Suppliers on the requirements of the Code.

Hoover CS Supplier Code of Conduct

Hoover CS is committed to the highest standards of product quality, safety and business integrity. We want to ensure that working conditions in our supply chain are safe, that workers are treated with respect and dignity, and that our suppliers’ operations are environmentally conscious. We expect all our suppliers and subcontractors to share the principles which are expressed in this Supplier Code of Conduct and to replicate these standards further down the supply chain.

The term “Supplier” or “Suppliers” means any person or entity that is the source for goods or services, back to the primary production level. The Code is applicable to all workers,



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employees, or subcontractors of any Supplier, including permanent, temporary, contract agency and migrant workers, whether at a Supplier location or working remotely..

We reserve the right to verify compliance with the Code through internal or third-party assessments and to require implementation of corrective actions where necessary. In these cases, we expect Supplier to establish clear milestones and processes to support their achievement. Suppliers who fail to comply may be subject to consequences up to and including termination of business.

Business Practices

Suppliers must implement management systems to facilitate compliance with all applicable laws, regulations, contractual agreements, and generally recognized standards, and to promote continuous improvement with respect to the expectations set forth in this Supplier Code of Conduct.

Suppliers must have systems in place to:

- Enable fair, confidential, and anonymous grievance reporting and follow-up without fear of reprisal, including whistleblower protections
- Maintain books and records in accordance with applicable law and generally accepted accounting principles
- Protect confidential information to which they have access, including intellectual property, trade secrets, or financial information, and to safeguard any property belonging to Hoover CS while under their control
- Avoid any situations that may adversely affect our business interests or reputation
- Prevent any form of corruption, extortion, or embezzlement, including a zero-tolerance approach to bribery and kickbacks
- Conduct their business in line with fair competition and in accordance with all applicable anti-trust laws

We reserve the right to ask Suppliers for a full supply chain map to facilitate risk assessment and gauge compliance in the upstream supply chain. Suppliers shall be transparent about all known facilities used to produce products or services for us and provide such information upon request. At our request, Suppliers are expected to provide reports on the occurrence of substances in any materials supplied to us that may be restricted by, or require disclosure to, governmental bodies, and/or customers.

Labor Practices

We expect Suppliers to respect the personal dignity, privacy, and human rights of each individual and:

- Avoid any sort of child labor in their business operations consistent with the International Labor Organization’s (ILO) core labor standards



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- Uphold freely chosen employment practices, with no toleration for forced, prison, bonded, indentured, or involuntary labor in their operations and supply chain
- Where required by applicable law, provide employees with a written employment agreement that complies with local laws and regulations, and inform workers of their legal rights and employment conditions in a language understood by the employee
- Respect the maximum number of working hours under applicable laws and provide compensation to employees that complies with applicable national wage laws, with all overtime work paid at the legally mandated overtime rate, or in the absence of this, a premium wage
- Protect equal opportunities for and treatment of its employees irrespective of skin color, nationality, race, disabilities, political or religious conviction, sexual orientation, gender identify, age, sex, social background, physical characteristics, union membership, family status, or pregnancy
- Refuse to tolerate sexual harassment or discrimination, and provide employees with a workplace free of corporal punishment or torture, mental or physical coercion or verbal abuse of employees, or the threat of any such treatment
- Respect the rights of employees to associate freely, join labor unions, seek representation, join works councils, and engage in collective bargaining, as permitted by applicable law
- Provide a safe and healthy working environment, including appropriate controls, safe work procedures, preventative maintenance, and necessary technical protective measures to mitigate health and safety risks in the workplace
- Identify and assess likely and potential emergency situations in the workplace and minimize their impact by implementing emergency plans and response procedures
- Ensure that employees have access to potable drinking water and clean toilet facilities at all times at the workplace and that accommodations, where provided, are clean, safe, affordable, meet the basic needs of workers, and conforms to applicable laws
- Respect the rights and titles to property and land of individuals, indigenous peoples, and local communities and ensure that negotiations regarding property and land adhere to principles of free, prior and informed consent, as well as contract transparency and disclosure

Environmental Practices

We are committed to operating in a way that respects the environment, is thoughtful about the use of natural resources, and is focused on continuous improvement. At a minimum, we expect that Suppliers will:

- Act in compliance with the applicable statutory and international standards of environmental protection
- Work to reduce their carbon footprint



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- Protect water resources by thoughtful use of water in their operations, avoiding contamination from their operations, and reducing the impact on the water resources of the surrounding communities, especially in areas of high baseline water stress
- Reduce waste-to-landfill through strategic sourcing initiatives, reuse and recycling practices, optimized manufacturing and packaging systems, and employee training
- Identify and reduce the risk of hazardous materials, chemicals and substances, including providing relevant employees with proper training for safe handling, storage and disposal and developing processes to prevent or mitigate accidental spills and releases into the environment

How to Raise a Concern

If you see or suspect any conduct or business practices that you think could violate this Code, please contact us directly. You may raise a concern to your usual contact at Hoover CS or via our ethics hotline that can be reached as follow:

Phone: +1-800-225-5288

Website: www.lighthouse-services.com/hooversolutions

E-mail: reports@lighthouse-services.com (must include company name with report)

Getting in touch with us quickly helps to prevent problems and correct any that have already occurred. We handle all reports promptly, fairly, and as confidentially as possible.