# 1. Introduction

## 1.1 Purpose

Being a worldwide leader in our field, INOAC USA, Inc. and our subsidiaries ("INOAC") are dedicated to embodying and improving on its position. We are committed to customer and team member satisfaction, always conducting business with integrity and compliance, while adhering to high ethical standards with the expectations that our business partners do the same.

We recognize that our suppliers play a crucial role in creating a responsible and sustainable value chain. As such, it is important to integrate our key standards that we practice and ensure within our organization, into our supply chain partners. These include Environmental Responsibility, Social Compliance and Standards, Business Ethics Compliance, and other key areas. Suppliers that we engage with and with which we enter business partnerships must have a commitment to focus on improving and maintaining their Corporate Social Responsibility (CSR).

We commit to sourcing as many of our products as possible from high quality, safe and sustainable sources within our global supply chain. Given that the supply chain forms an important part of INOAC's social and environmental impact, INOAC must ensure that the relevant environmental, social, and ethical impacts are fully understood and addressed by our suppliers. For this purpose, INOAC has implemented INOAC's Code of Conduct, which covers these aspects of our business.

## 1.2 Scope

This document supersedes all previous revisions and applies to all present and any potential future suppliers that we engage with, both on premises and off-site. We expect suppliers to comply with the requirements set forth within this code of conduct document in terms of environmental, social, human rights and ethical elements. This code of conduct outlines values and standards that are important to INAOC which suppliers must adhere to in terms of sustainability. It is the duty of INOAC to clearly communicate to all relevant suppliers the necessary standards and requirements we expect.

## 1.3 Compliance with the Code

It is the responsibility of the supplier to ensure full compliance with the requirements and obligations laid out within this Supplier Code of Conduct document. This in turn means that the

supplier must demonstrate openness and transparency in collaborating with INOAC on issues that may be related to compliance.

Suppliers should conduct regular reviews to ensure compliance with this Code and implement appropriate remediation mechanisms if any risks are identified. Upon the request of INOAC, a supplier may be asked to provide evidence of its compliance with the relevant obligations presented within this Supplier Code of Conduct.

Suppliers should regularly train and communicate with their eligible employees and contractors on these requirements as well as their own best practices. This training should cover the content of the Code, with all relevant personnel. This ensures that everyone involved in the supply chain understands their responsibilities and follows best practices.

## 1.4 Breach of the Code

In case of breach of the obligations and requirements presented within this Supplier Code of Conduct, it is the responsibility of INOAC to issue and carry out any potential corrective actions on suppliers to ensure the maintenance of INOAC's standards and expectations of suppliers.

Examples of violations include, but are not limited to:

1. Broken national and international laws or governmental regulation and legislation.
2. Severe environmental impact (air and water pollution, waste, etc.)
3. Ethical misconduct (corruption, bribery, anti-competitive practices etc.)
4. Workforce violations (health and safety, working conditions, etc.)
5. Breach of labor and human rights (illegal hiring, child labor, forced labor, human trafficking, withholding of passports or employee legal documentation)

If a violation is reported, INOAC will have the power to take the following action:

1. Verbal or Written warning.
2. Engage with the supplier in a corrective action process.
3. Suspension or Termination of supplier contract.

## 2. The Supplier Code of Conduct ("Code")

### 2.1 Environmental Responsibility

Suppliers shall comply with and be certified in all applicable local environmental laws and regulations and must comply with all applicable environmental management system standards (e.g. ISO-14001 or equivalent). Supplier are expected to align to our commitments by developing and implementing an Environmental Sustainability Program.

#### *2.1.1 Energy Consumption, Green House Gas Emissions (GhGs) and Renewable Energies*

Considering the growing importance of environmental considerations such as circularity, recyclability, and reusability within our industry, INOAC encourages its suppliers to play an active role in monitoring their energy consumption and GhG emissions aiming to reduce them year-on-year as much as feasible.

INOAC encourages its suppliers to start the necessary processes to measure and track energy consumption and emission production which act as an important part in integrating conscious and circular production processes. In addition, we recommend our suppliers pursue and engage with achieving sourcing renewable energy for as much of their production as possible.

Many of our customers have specific GhG goals that INOAC and our supply base must achieve for them to reach their Scope 3 compliance. These goals will be provided separately to those suppliers impacted by these requirements.

#### 2.1.2 Environmental Compliance and Reporting

Suppliers must comply with all the required local and internationally required environmental permits necessary to carry out their operations legally and in a safe manner for the environment. In addition, reporting on these requirements should also be respected regarding applicable permits and regulations.

#### 2.1.3 Water and Soil Management

We actively encourage our suppliers to engage in and consider sustainable and conscious water and soil consumption practices throughout operations. Suppliers are expected to ensure observance of all applicable laws and regulations for environmental protection, including water and soil management. We encourage our suppliers to reduce wastewater and find innovative water saving alternatives to equipment and processes where possible to facilitate the reduction of water waste.

### 2.1.4 Air and Other Forms of Pollution

We encourage our suppliers to be conscious of and take the necessary measures to minimize and manage any form of air, particle or noise pollution that may be produced by suppliers' operations. Suppliers should take all feasible steps to adopt emissions reducing technology and practices within their operations.

### 2.1.5 Materials, Chemicals and Waste

Suppliers should reduce the use of unsustainable materials and production of waste where possible by embracing and embedding reuse, reduce and recycle processes into daily operations. In addition, where chemicals and other materials are posing a hazard to human health, safety or the environment, suppliers need to follow the proper relevant procedures, and guidance on identification and management to manage associated risks. Suppliers are expected to have the necessary documentation of proper and safe handling, storage, use and recycling or reuse and disposal of hazardous waste.

### 2.1.6 Animal Protection

At INOAC, we recognize the importance of responsible leather procurement and its impact on animal welfare. We are committed to ethical practices that prioritize both the quality of our leather products and the well-being of animals. Therefore, we expect our suppliers, especially those providing natural animal products, to adhere to sound animal husbandry principles. Suppliers must source animal hides from processors that practice sound animal husbandry, humane treatment, and ethical slaughtering practices.

## 2.2 Social Compliance

INOAC strives to have a high-corporate value system, and we expect our supplier partners to conduct all your activities by observing the Ten (10) Principles of Social Responsibility and Sustainable Development of the UN Global Compact.

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### 2.2.1 Diversity, Discrimination & Harassment

We do not permit or tolerate any form of discrimination or harassment within our operations in terms of race, color, age, national origin, religion, sex, gender identity, sexual orientation, pregnancy, and disability. We believe that diversity is a source of strength, and we require our suppliers to comply with and embed this zero-tolerance approach to discrimination into their business operations.

### 2.2.2 Human Rights and Child and Forced Labor

The rights and dignity of our team members, suppliers and all related stakeholders deserve to be respected, and their rights protected regardless of location or function within INOAC. We expect our suppliers to follow and act in respect to and in accordance with the International Labor Organization rules and the Universal Declaration of Human Rights. Our suppliers are never permitted to use forced or underaged labor, as defined by local labor laws or charge recruitment fees to their employees.

We also expect our suppliers to have the necessary reporting and whistleblowing procedures in place to properly process and address any potential breaches of human rights.

### 2.2.3 Working Hours, Wages, Benefits & Working Conditions

Suppliers should ensure that team members are only permitted to work the legal maximum in the country and region of business, and that team members are granted a minimum of one day off per seven-day period. When overtime is worked this must be agreed upon with team members and compensated in line with agreed conditions and national and/or local legislation.

Wages should be respected and in line with minimum wage legislation and regulations.

Suppliers should allow the rights of team members to unionize and join trade unions where relevant and applicable. Team members should not be discouraged or their rights to join or create unions or representative bodies disrupted. This means that workers' freedom of association and the right to collective bargaining need to be respected by all team members.

### 2.2.4 Ethical Recruiting

Supplier partners should not mislead or defraud potential workers about the nature of work, job roles, or employment conditions. Suppliers should not ask workers to pay recruitment fees directly or indirectly. Charging workers for job placement is strictly prohibited. Suppliers must

not confiscate, destroy, conceal, or deny access to worker passports and other government-issued identity documents. Workers' right to retain their personal identification is essential.

### 2.2.5 Occupational Health & Safety

We require our suppliers to dedicate the utmost importance and attention to the health and safety hazards and potential risks for their team members, while complying with all applicable local health and safety laws. Suppliers should provide workers with properly maintained personal protective equipment, as well as instruction on its proper use, for all the tasks and work needed to be performed. Suppliers shall have a defined procedure for dealing with injuries that require medical treatment. Facilities alongside equipment must be regularly inspected and maintained. Suppliers should assess and evaluate the health and safety standards and risks in their facilities through regular checks such as risk assessments, internal audits, and regular equipment inspections.

### 2.2.6 Use of Private or Public Security Forces

Suppliers must ensure that any security force, whether private or public, engaged in protecting their operations adhere to international human rights standards and ethical practices. Security personnel must be trained to respect the rights and dignity of all individuals, including employees, contractors, and community members. The use of force must be strictly limited to what is necessary and proportionate to protect people and property.

Suppliers must not engage security forces in activities that involve intimidation, coercion, or suppression of lawful worker rights, including freedom of association and collective bargaining. Any incidents of excessive force, abuse, or misconduct must be reported and addressed promptly. Suppliers are responsible for conducting due diligence on security providers to ensure compliance with applicable laws and best practices regarding human rights and responsible business conduct.

Failure to adhere to these principles may result in corrective actions, up to and including termination of the business relationship.

## 2.3 Business Ethics Compliance

INOAC is committed to fostering a business environment built on trust, transparency, and ethical conduct. Our Code outlines the principles and expectations we have for our suppliers. By adhering to these standards, suppliers contribute to a sustainable and responsible business ecosystem.

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### 2.3.1 Bribery, Fraud and Corruption

INOAC has a zero-tolerance approach to bribery, fraud, and corruption. This means that suppliers must exercise vigilance and are required to comply and abide by all applicable national laws regarding bribery, fraud, and corruption. Suppliers are expected to act transparently and implement necessary preventative measures in terms of reporting, sanctions and ethical codes of conduct or policies that assist in preventing employees from engaging in unethical activities.

Suppliers should avoid any situations where personal interests interfere with fair business practices and should not accept any form of gift or payment in exchange for business benefits, improved opportunities, or unfair advantages in terms of services or contracts.

### 2.3.2 Conflicts of Interest / Fair Competition

We require our suppliers to disclose any conflicts of interest promptly and to adhere to all relevant competition laws applicable and engage in fair business practices. Suppliers must not engage in any competition fixing or cartel building behavior to gain a favorable or dominant market position over business competitors or in business relationships.

### 2.3.3 Data Confidentiality and Information Security

Suppliers are compelled to take all necessary and available actions to protect the confidentiality of the information and data that they process, store, and manage during their operations. Suppliers shall restrict access to confidential data only to authorized personnel who require it for legitimate business purposes. In addition, information that relates to INOAC should not be shared without explicit permission of the group.

We urge suppliers to engage in the proper access, usage, handling, storage, and transfer of any personal information to be carried out in accordance and in compliance with applicable national privacy laws. To guarantee end to end security, suppliers should assess and manage security risks associated with third-party vendors and subcontractors. In the event of an incident regarding INOAC data security, the supplier shall promptly report any security incidents or breaches to our organization and collaborate in resolving them.

### 2.3.4 Prevention of Unauthorized Parts & Materials

INOAC is committed to the prevention and use of unauthorized, counterfeit, or substandard parts. Our suppliers must also adhere to this commitment and ensure that all parts meet

approved quality and safety standards and meet all drawing and specification requirements. Suppliers shall only purchase parts or materials from approved sources, maintaining traceability and documentation. Suppliers will report any unauthorized or suspicious materials or parts immediately to the appropriate channels and not use said materials or parts until approved by INOAC. INOAC follows contractual and legal intellectual property rights, and we require that our suppliers warrant their products are free from any intellectual property violation.

### 2.3.5 Trade Sanctions and Export Control

INOAC is committed to complying with recognized and lawful trade sanctions and export control regulations. We strive to ensure that all third parties we engage with have undergone due diligence and proper screening against sanctions lists.

We encourage suppliers to check the applicable trade rules and consistently apply them when arranging any cross-border transactions. This includes financial transactions, technology transfers, transactions that are free of charge, returns, or hand-carried goods. Our suppliers should also ensure that third parties that they deal with have undergone due diligence and have screened against the sanction lists.

### 2.3.6 Responsible Mineral Sourcing

INOAC is committed to the responsible sourcing of minerals, particularly those defined as "conflict minerals" (tin, tantalum, tungsten, and gold — 3TG), and extends this commitment to our entire supply chain.

INOAC is committed to:

- Avoiding the procurement of minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or adjoining countries.
- Supporting the responsible sourcing of minerals from conflict-affected and high-risk areas (CAHRAs) that contributes to local development and does not fuel human rights abuses.
- Conducting due diligence in alignment with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- Responding accurately and transparently to customer inquiries related to mineral sourcing, such as the Conflict Minerals Reporting Template (CMRT).
- Working collaboratively with our supply base to increase transparency and traceability throughout the minerals supply chain.

INOAC's suppliers are expected to:

- Establish and implement a company policy regarding conflict minerals and responsible sourcing.

- Exercise due diligence on the source and chain of custody of the 3TG minerals and provide INOAC with complete and accurate CMRT submissions annually or upon request.
- Source materials only from smelters and refiners that are certified as conformant with a recognized third-party audit protocol (e.g., RMAP – Responsible Minerals Assurance Process).
- Cease any sourcing of materials linked to human rights violations, illegal mining, or conflict funding.
- Cascade these responsible sourcing expectations throughout their own supply chain.
- Notify INOAC immediately if they become aware of any non-conformant minerals in products supplied to us.

Suppliers should confirm their entire supply chain to guarantee compliance with this requirement. Suppliers who do not comply may be subject to review, corrective action plans, or, if necessary, suspension or termination of the business relationship.

### 2.3.7 Responsible Procurement Activities

We recognize that procurement decisions have far-reaching implications. As we state throughout this Code, we are committed to responsible sourcing, ethical conduct, and positive impact. Therefore, we expect all stakeholders involved in procurement to adhere to these policies and to cascade them to your supplier partners and ensure adherence. By adhering to this code of conduct, we collectively contribute to a more sustainable and equitable future.

### 2.3.8 Media Inquiries

INOAC recognizes that suppliers may be contacted by various media outlets seeking information. If a supplier partner should receive an inquiry related to INOAC from a media representative, the partner must direct them to INOAC. Our supplier partners are not permitted to discuss matters involving INOAC with any reporters or other media representatives without the written consent of INOAC.

## 3. Supplier Acknowledgement

By signing this document, the Supplier receipt of INOACs Supplier Code of Conduct and agrees to comply with the expectations and criteria described in this Supplier Corporate Social Responsibility (CSR) Code of Conduct.

Furthermore, by signing, the supplier is aware of the consequences of breaching this Code of Conduct and understands that non-compliance may lead to the suspension or termination of business between INOAC and the Supplier.

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| Supplier Name: | |
| Supplier Location: | |
| Contact Name: | |
| Contact Title: | |
| Date: | |
| Signature: | |