



Supplier Code of Conduct

USIC's purpose is to protect infrastructure, and our supplier partnerships are key to achieving it. We are committed to the continuous development of these partnerships and the manner in which we, and our suppliers, address and manage important issues in alignment with our core values.

USIC values our supplier partnership and is committed to working with, and supporting, our suppliers to achieve mutual objectives. A supplier's performance and adherence to high business standards is integral to USIC's value chain. We promote and expect the application of high legal, ethical, environmental and employee-related standards within our own business and among our suppliers.

Our commitment to integrity and professionalism is set forth in our Employee Code of Conduct, which provides a clear set of standards. We believe that deviations from, or violations of, the Employee Code of Conduct are unacceptable and that our suppliers should be confident in the ability to raise issues without any fear of retaliation or discrimination. To that end, we encourage the use of our ethics hotline (877.452.3576) for addressing sensitive ethical issues.

This Supplier Code of Conduct sets forth the minimum standards of business conduct that we expect of our suppliers:

1. **Compliance with laws:** Suppliers shall comply fully with all laws and regulations applicable to them.
2. **Environmental sustainability:** USIC expects its suppliers to demonstrate a clear understanding of the environmental risks, impacts and responsibilities associated with the products and services they provide:
 - 2.1 Suppliers should have in place an effective environmental policy, statement or program to mitigate environmental risks, the implementation of which should be evident throughout all levels of the company.
 - 2.2 Suppliers should have processes in place to ensure that their operations conform to all applicable environmental legislation. All required environmental permits, approvals and registrations are to be obtained, maintained and complied with in accordance with the conditions and requirements defined therein.
 - 2.3 Environmental performance should be measured, monitored and reviewed regularly. Suppliers should endeavor to make continuous improvements in environmental performance through practicable measures and employ leading practices where possible.
 - 2.4 Suppliers should make practical efforts to minimize the use of energy, water and raw materials. Where possible, these should be renewable or sustainably sourced.
 - 2.5 Suppliers shall make practical efforts to eliminate or reduce levels of generated waste and should reuse and recycle waste materials wherever possible. The handling, storage, movement, treatment and disposal of all waste must be carried out in accordance with applicable regulations and in an environmentally responsible manner.
 - 2.6 Suppliers should consider the environmental credentials and performance of vendors within their own supply chain and require them to operate in adherence with a minimum set of standards.
 - 2.7 Products and services provided to USIC should include options that offer reduced environmental impact by utilizing environmentally sound technologies, processes and sustainable materials, etc. when applicable.

3. **Human rights and social sustainability:** Policies should be in place to confirm the supplier's commitment to points 3.1 - 3.5, and improvement programs should be in place where relevant:
- 3.1 Freedom from forced labor, bonded labor and human trafficking
 - 3.2 Child labor: Suppliers should adhere to local laws relating to the minimum working age and not engage in the employment of child labor, directly or indirectly.
 - 3.3 Wages and benefits: At a minimum, the legal minimum wage standard must be adhered to across the entire workforce; employees should receive clear information on their wages; and unfair deductions from wages as a disciplinary measure are not permitted.
 - 3.4 Working hours: Working hours must be limited according to national or local law, including breaks. Overtime should be voluntary, should not replace regular employment and must be compensated.
 - 3.5 Subcontracting: Where authorized, subcontracting is used to support the execution of services for USIC; suppliers shall confirm that subcontractors meet the minimum expectations set out in Section 3 of this document through the following controls:
 - Suppliers shall take necessary steps to obtain and maintain visibility pertaining to labor rights risks within the operations and supply chains of subcontractors.
 - Suppliers shall have written agreements in place with subcontractors to ensure that any further subcontracting by the subcontractor company (a) is authorized and (b) meets the standards set out in this document.

4. Diversity and inclusiveness: Our sourcing decisions, contracts with suppliers and management of supplier partnerships will reflect and promote the principles of diversity and inclusiveness (incorporating equal opportunities) in that they will seek to ensure that suppliers do not victimize, harass or discriminate against any employee or party to the contract due to their sex, gender identity/expression, marital or civil partnership status, race, ethnicity or national origin, disability, religion, sexual orientation, age or part-time status. Suppliers will be required to meet the requirements of any applicable discrimination legislation. Our suppliers will be treated fairly and equally during the tendering and purchasing process.

5. Ethics: The highest standard of integrity is expected in all our business dealings. Any and all forms of corruption, extortion, bribery (including facilitation payments), and embezzlement are strictly prohibited and may result in immediate termination and legal action:

- 5.1 Suppliers will not offer or provide money or anything of value to any person if the circumstances indicate that it is probable that all or part of the money or other thing of value is being given to another individual or entity to influence official action or to obtain a business advantage.
- 5.2 Suppliers are expected to understand relevant USIC gift and hospitality policies before offering or providing USIC personnel with any gift and/or business entertainment. Gifts or entertainment should never be offered to USIC personnel or representatives under circumstances that create the appearance of impropriety.
- 5.3 Suppliers must comply with all applicable trade control laws and regulations in the import, export, re-export or transfer of goods and services (including software and technology). All invoices and any customs or similar documentation submitted to USIC or governmental authorities in connection with transactions involving USIC must accurately describe the goods and services provided and the price thereof.
- 5.4 Suppliers shall not share or exchange any prices, costs or other competitive information, or undertake any collusive conduct with any other third party to USIC with respect to any proposed, pending or current USIC procurement.
- 5.5 Suppliers will use only subcontractors or other third parties who comply with all applicable laws and regulations, and who adhere to the same (minimum) standards set forth in this guide.

6. Monitoring: USIC may conduct annual compliance surveys to confirm compliance with this Supplier Code of Conduct. However, USIC expects that suppliers will actively audit and monitor their day-to-day management processes with respect to the USIC Supplier Code of Conduct and provide evidence to USIC upon request.