

XMA SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct (“Code”) establishes the standards of behavior that are required for all suppliers (each, a “Supplier”, and collectively, the “Suppliers”) doing business with XMA Corporation and/or its affiliates (collectively, “XMA”), wherever they are located in the world.

The provisions of this Code are in addition to, and not in lieu of, the provisions of any legal agreement or contract between a Supplier and XMA or any of its affiliates. We expect all Suppliers to hold their supply chain, including without limitation, their employees, partners, subcontractors and third-party labor agencies, to the same standards contained in this Code. This Code does not create any third-party beneficiary rights or benefits for any Supplier, their subcontractors, their respective employees or any other party.

1. Compliance with Laws

At a minimum, each Supplier and its facilities must fully comply with all applicable national, state and/or local laws and regulations, including but not limited to those related to: human rights, workplace discrimination, labor relations, wages, immigration, health and safety and the environment.

2. Employment is Voluntary; No Forced Labor or Human Trafficking

All of Suppliers’ employees shall work on a voluntary basis and not be subject to any form of coercion or exploitation. XMA condemns forced labor and human trafficking and will not knowingly work with any Supplier who engages in any such practices. Suppliers shall not use forced labor, including prison labor, indentured labor, bonded labor, or other forms of forced labor. All of Suppliers’ employees shall maintain possession or have control of their personal identity and travel documents. Suppliers shall not restrict or prevent Employees from terminating their employment. Suppliers shall not engage in or support human trafficking, including without limitation, transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.

3. Child Labor

Suppliers shall not employ anyone younger than 16, regardless of the country’s minimum working age. Suppliers shall ensure that any employees under 18: (i) shall not work more than the maximum hours per day/week permitted under applicable laws; (ii) are not employed in hazardous conditions, and (iii) shall not perform hazardous work that is likely to jeopardize their health or safety.

4. No Discrimination

Suppliers shall employ employees (regular and temporary; direct or indirect labor) based solely on their ability to do the job and shall not subject employees to discrimination in recruitment or employment practices, including discrimination on the basis of age, race, color, caste, ethnicity, nationality, religion, gender identity, sexual orientation, marital status, or disability.

5. Harassment and Abuse are not Tolerated

All of Suppliers’ employees shall be treated with fairness, respect and dignity and shall not be subjected to any corporal punishment or any physical, verbal, sexual, or psychological harassment or abuse in connection with his or her recruitment or employment.

6. Women’s Rights

Suppliers shall ensure that all female employees will receive equal remuneration, including benefits, to males in comparable positions as well as equal treatment, equal evaluation of the quality of their work, and equal opportunity to fill all positions open to male employees. Suppliers shall also provide appropriate facilities, services and all reasonable accommodation to female employees in connection with their pregnancies.

7. Wages and Benefits

Suppliers shall provide wages and benefits that comply with all applicable laws and rules. Wage deduction as a disciplinary measure shall be prohibited. Suppliers’ employees shall be provided with overtime pay in accordance with all applicable laws.

8. Labor Hours

Suppliers shall ensure that working hours comply with all applicable national and local laws as well as all applicable collective labor agreements. All of Suppliers' employees shall have at least one day off in a seven-day work week, and all overtime work must be voluntary.

9. Health and Safety; Employee Housing; and Training

Suppliers must provide employees with a safe, clean and healthy work environment, with access to potable drinking water and adequate and clean toilet and handwashing facilities. If a Supplier provides residential facilities for their employees, they must be safe, sanitary and at no cost or at a reasonable rent. Suppliers shall take proactive measures to prevent workplace hazards and provide appropriate personal protective equipment and training to promote workplace safety. Suppliers shall also regularly train their employees on evacuation procedures in the case of emergency.

10. Ethics and Business Integrity; Anti-Corruption

Suppliers shall adhere to the highest standards of natural and local ethical behavior and business integrity, and shall not tolerate, permit, or engage in bribery, corruption, or unethical practices, whether in dealings with employees, suppliers, customers, government agencies, public officials, party officials or individuals in the private sector. Under no circumstances may a Supplier offer, promise or provide anything of value directly or indirectly to a government official or party official for the purpose of exerting improper influence or to obtain or retain an improper benefit or advantage.

11. Environment

Suppliers shall comply with all applicable environmental laws, policies and regulations, including all laws related to waste disposal, air emissions, discharges, chemicals handling, toxic substances, effluent discharges, and hazardous waste disposal. Suppliers shall continuously monitor and manage all production processes to minimize negative impacts on the environment.

12. No Conflict Minerals

Suppliers shall ensure that their products do not incorporate "conflict minerals" (minerals mined in conditions of armed conflict and/or human rights abuses, and which are sold or traded by armed

groups). Suppliers shall perform sufficient due diligence on their own supply chains and subcontractors to ensure that any products (and any materials and components contained in such products) sold to XMA containing tin, tantalum, tungsten or gold are sourced from conflict-free smelters.

13. Intellectual Property Rights; Confidential Information; Security; and Privacy

Suppliers shall respect intellectual property rights and safeguard XMA's and third parties' confidential proprietary and trade secret information. All Suppliers are required to comply with all applicable security and privacy laws, regulations and retention requirements, and to ensure that they have appropriate technical and security controls in place to protect XMA's and third parties' confidential information.

14. Management System; Grievance Mechanism

Suppliers shall take a proactive approach to creating and implementing effective systems to ensure compliance with this Code. Suppliers shall create internal programs for handling reports of workplace grievances, including anonymous reports.

15. Raising Concerns

Suppliers who have a serious concern regarding any issue which may breach this Code should raise the matter with the appropriate XMA senior management. If you believe the matter cannot be handled appropriately in this way, you can also report any matters of concern by submitting a confidential report via email to leadership@xmacorp.com.

16. Audits

XMA reserves the right to audit or authorize a third party to audit any Supplier's facilities that participate in the production, processing or harvesting of products, materials or components for XMA. Such audits may include any of Supplier's subcontractors. Any such audits shall be unrestricted and may occur with or without advance notice.