



INDUSTRIAL ELECTRIC MFG. (IEM) Business Partner Code of Conduct

Introduction

Industrial Electric Mfg. (“IEM”) has a long history of success based on our strong reputation for excellence that reflects the hard work and accomplishments of all our team members and our excellent working relationships with others like you. IEM is committed to conducting business in strict compliance with our CORE VALUES. Doing business with care and integrity mean strictly complying with all applicable laws, rules and regulations as well as observing the highest standards of ethical behavior. We do business the right way!

IEM’s core values are at the heart of everything we do and serve as guiding principles that govern how we conduct ourselves. The core values described below represent IEM’s commitment to its employees, the community, the environment and our customers.

- **People Energize.** Selfless collaboration and supportive partnership, inside and out, is the heart of IEM’s value.
- **Listening Works.** Being flexible and open-minded helps us customize and continuously improve by putting insight and empathy at the center of how we deliver.
- **Solving Never Stops.** The ability to work through problems and solutions, innovate and adapt, is the foundation of the value we bring.
- **Everyone Owns It.** We collaborate with mutual accountability, own our mistakes, and find solutions without pointing fingers. Being honest and transparent is how we work best together.

When IEM works together with contractors, vendors, suppliers, subcontractors, consultants or other people or businesses essential to our work (“Business Partners”), we expect our Business Partners to conduct business activities in a manner that is consistent with IEM’s Code of Conduct and core values.

This Business Partner Code of Conduct (“Business Partner Code”) serves as an overview to provide our Business Partners guidance on expected conduct and behavior.

While the Business Partner Code is meant to provide guidance on important topics you may encounter as a Business Partner of IEM, it is not a comprehensive, full or complete representation of all of the policies, laws, and regulations that may apply to Business Partners.

Our mutual reputations and continued success rely on IEM and its Business Partners doing what is right.

1. Health, Safety, Environment

IEM is committed to protecting the health and safety of all team members, our current or prospective customers, and our Business Partners as well as the general public. IEM expects its employees and

Business Partners to obey safety rules and standards and exercise caution and common sense in all work activities. We are all responsible for following instructions and making safe choices in the workplace and on the jobsite.

IEM expects that its Business Partners will fully comply with all applicable federal, state and local health, safety and environmental laws, ordinances and regulations.

2. Forced & Child Labor

Business Partners will not use forced or involuntary labor whether bonded, prison or indentured, including debt servitude. Business Partners will not employ individuals in violation of the local mandatory school age or under the legal employment age in the country where they operate. Moreover, in no case will Business Partners employ workers under age 15, except for child actors and models employed in advertising or media who are protected by applicable child labor requirements.

3. Anti-Bribery and Anti-Corruption

IEM conducts business in an honest and fair manner at all times. It is IEM's policy that we never offer (or accept) a bribe to anybody under any circumstance, and we expect our employees and Business Partners to act with integrity in all our interactions with our customers and when doing business with each other. We expect our employees and Business Partners to never seek any improper influence and to avoid activities that create even the appearance that we sought, received or gave favorable treatment in exchange for business courtesies.

4. Gifts and Entertainment

IEM is committed to competing in our industry solely on the merit of our services, our people, and our expertise. We must avoid any actions that create a perception that IEM sought, received, or gave favorable treatment in exchange for personal business courtesies. Managing this perception is important on both sides of our business – those who hire us and those who we hire.

While our employees can accept occasional meals, refreshments, entertainment and similar business courtesies, we expect our employees and Business Partners to always proceed with caution and exercise good judgment in giving or receiving certain meals, entertainment or even nominal gifts. Receiving or accepting gifts or entertainment may be inappropriate or illegal in certain circumstances or could create the perception that we sought, received, or gave favorable treatment in exchange for gifts or personal business courtesies. Generally, IEM employees may not accept compensation, honoraria (fees, allowances, grants, scholarships), or money of any amount from Business Partners.

Special laws and regulations apply to public company and federal, state, and local government customers and Business Partners.

4. Antitrust and Fair Competition

IEM is committed to free and open competition in the marketplace. We expect that both IEM and its Business Partners comply with all applicable antitrust and unfair competition laws, as well as those laws related to unfair business practices.

5. Conflicts of Interest

IEM expects all employees and Business Partners to avoid conflicts of interests or the appearance of conflicts of interest. IEM employees may not have any economic involvement or interest with any competitors or customers or Business Partners of IEM and vice-versa. IEM Business Partners should contact IEM's Legal Department immediately in cases involving transactions where a close family member of an IEM employee is involved in making corporate decisions for that Business Partner.

6. Confidential Information

IEM's employees and its Business Partners must protect any confidential or proprietary business information and trade secrets obtained in our professional capacity. We also expect our employees and Business Partners to take reasonable steps to ensure confidential business information is safely handled and secured in a manner that prevents unauthorized access by external parties.

7. Respect, Diversity, Harassment and Discrimination

IEM strives to foster a safe, welcoming and positive workplace environment where we treat our employees, Customers and Business Partners with dignity, fairness and respect. IEM is committed to providing a work environment that is free of discrimination and unlawful harassment. IEM prohibits discrimination and harassment, including sexual harassment, based on individual's race, color, religion, sex, sexual orientation, gender identity, national origin, age, marital status, genetic information, disability or protected veteran status, or any other category protected by law. We expect our Business Partners to demonstrate the same commitment.

8. Trade and Customs Compliance

Business Partners must comply with all applicable laws and regulations related to the exportation and importation of products. In order to protect the integrity of cargo being shipped, Business Partners must strive to comply with supply chain security processes and procedures consistent with U.S. Customs Trade Partnership Against Terrorism (CTPAT) and other relevant programs such as Authorized Economic Operator (AEO).

9. Reporting Violations

We expect our Business Partners to report any concern of illegal or unethical activities or violations of this Business Partner Code to IEM's Legal Department at ***legal@iemfg.com***.

Anonymous reports can also be made through IEM's toll-free hotline, available in English and Spanish, at the following number:

(833) 207-6273

Anonymous reports can also be made online at the following address: ***iemfg.ethicspoint.com***.

Reports (which must include the company name) can also be made by email at the following e-mail address: ***iemfgmobile.ethicspoint.com***.

IEM takes all reports of suspected violations seriously and will conduct investigations into all reports professionally and promptly and respond as appropriate.

10. Compliance with Laws and Regulations

All IEM employees must conduct business in strict compliance with all applicable federal, state and local laws and regulations and we expect our Business Partners to do the same. IEM may refuse to continue doing business with any Business Partner who violates this Business Partner Code or otherwise engages in illegal or unethical business conduct.