

Huntwell Technology Corp. Supplier ESG Code of Conduct

August 1, 2025

Innovation, commitment, and value are the core of Huntwell Technology Corp. (hereinafter referred to as Huntwell). While pursuing growth, we actively promote sustainability to meet the expectations of all stakeholders. In addition to implementing the Responsible Business Alliance (RBA) on sustainability issues, Huntwell also exerts its influence to require its supply chain to adhere to and collaborate on fulfilling corporate social responsibility.

Compliance with these standards will be a crucial basis in Huntwell Technology Corp.'s procurement decisions. Suppliers shall identify, rectify any operational process defects or potential failures that do not meet these standards, establish improvement plans, ensure continuous implementation and monitoring, and provide reports or records of improvement actions and procedures to demonstrate compliance with Huntwell Technology Corp.'s requirements of the standards.

The ESG policy of Huntwell Technology Corp. is based on the [Code of Conduct of Responsible Business Alliance, RBA](#), and is formulated on the basis of the "[UN Universal Declaration of Human Rights](#)," "[The UN Global Compact](#)," "[The UN Guiding Principles on Business and Human Rights](#)," "[Declaration of Fundamental Principles and Rights at Work](#)" of [International Labor Organization, ILO](#) and [OECD Due Diligence Guidance for Responsible Business Conduct](#), **covering all Huntwell Technology Corp., contractors and supply chains.**

The Code is made up of five sections including Sections for A. Labor, B. Health and Safety, C. Environment, D. Business Ethics, and E. outlines the elements of an acceptable system to manage conformity to this Code.

A. Labor

Suppliers shall commit to upholding the human rights of workers, and to treat them with dignity and respect as understood by the International recognized standards. This policy applies to all direct and indirect suppliers, as well as all types of labor, including temporary workers, migrant workers, students, contract workers, directly hired employees, and any other forms of labor.

Labor Standards

(1) **Prohibition of Forced Labor** Forced labor in any form, including but not limited to,

bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company- provided facilities including, if applicable, workers' dormitories or living quarters. As part of the hiring process, all workers must be provided with a written employment agreement in their native language, or in a language the worker can understand, that contains a description of terms and conditions of employment. Foreign migrant workers must receive the employment agreement prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work shall be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given, which shall be clearly stated in workers' contracts. Suppliers shall maintain documentation on all leaving workers. Employers, agents, and sub-agents' may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Notwithstanding the foregoing, employers can only hold documentation if necessary to comply with the local law. In this case, at no time shall workers be denied access to their documents. Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

- (2) **Young Workers** Child labor shall not be used in any stage of manufacturing. The term "child" refers to any person under the age of 16, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. Suppliers shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Suppliers shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labor is identified, assistance/remediation

shall be provided.

- (3) **Working Hours** Working hours shall not exceed the maximum set by local law. Further, a work week shall not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime shall be voluntary. Workers shall be allowed to have at least one day off every seven days.
- (4) **Wages and Benefits** Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. All workers shall receive equal pay for equal work and qualification. Workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor shall be within the limits of the local law.
- (5) **Non-Discrimination / Non-Harassment / Humane Treatment** Suppliers shall commit to maintaining a workplace free of harassment and unlawful discrimination. There shall be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Suppliers shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers. Workers shall be provided with reasonable accommodation for religious practices and disability. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.
- (6) **Freedom of Association and Collective Bargaining** Suppliers encourages workers shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment. In alignment with local law, suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to

elect and join alternate lawful forms of worker representations.

B. Health and Safety

Suppliers shall recognize that, in addition to minimizing the incidence of work-related injuries and illnesses, a safe and healthy work environment enhances product quality, service consistency, production efficiency, worker retention, and morale. Suppliers shall also recognize that continuous worker input and education are essential for identifying and resolving health and safety issues in the workplace. Suppliers shall establish a comprehensive internal Health and Safety management system, either through self-declaration or by obtaining third-party certification in accordance with ISO 45001.

Health and Safety Standards

- (1) **Occupational Health and Safety** Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) shall be identified and assessed, mitigated using the Hierarchy of Controls. Where hazards cannot be adequately controlled by these means, workers shall be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Gender-responsive measures shall be taken, such as not having pregnant women and nursing mothers in working conditions, which could be hazardous to them or their child and to provide reasonable accommodations for nursing mothers.
- (2) **Emergency Preparedness** Potential emergency situations and events shall be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Emergency drills shall be executed at least annually or as required by local law, whichever is more stringent. Emergency plans shall also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.
- (3) **Occupational Injury and Illness** Procedures and systems shall be in place to prevent, manage, track and report occupational injuries and illnesses, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work. Suppliers shall allow workers to remove themselves from imminent harm, and not return until the situation

is mitigated, without fear of retaliation.

- (4) **Industrial Hygiene** Worker exposure to chemical, biological, and physical agents shall be identified, evaluated, and controlled according to the Hierarchy of Controls. When hazards cannot be adequately controlled, workers shall be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Suppliers shall provide workers with safe and healthy working environments, which shall be maintained through ongoing, systematic monitoring of workers' health and working environments. Suppliers shall provide occupational health monitoring to routinely evaluate if workers' health is being harmed from occupational exposures. Protective occupational health programs shall be ongoing and include educational materials about the risks associated with exposure to workplace hazards.
- (5) **Physically Demanding Work** Worker exposure to hazards associated with physically demanding tasks and ergonomic risk factors—including manual material handling, heavy or repetitive lifting, highly repetitive or forceful operations and assembly tasks, as well as musculoskeletal injuries or disorders caused by improper working postures or excessive working hours—shall be identified, evaluated, and controlled.
- (6) **Machine Safeguarding** Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers shall be provided and properly maintained where machinery presents an injury hazard to workers.
- (7) **Sanitation, Food, and Housing** Workers shall be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the facility/factory and/or via a labor agent shall be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, and adequate conditioned ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.
- (8) **Health and Safety Communications** Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Health information and training shall include content on specific risks to relevant demographics, such as gender and age, if applicable. Training shall be provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any

health and safety concerns without retaliation.

C. Environmental Protection

Fulfilling environmental responsibilities is an essential duty for businesses. Suppliers shall identify and assess the environmental impacts, minimize adverse effects on the community, environment, and natural resources within their manufacturing operations, and safeguard public health and safety to promote sustainable development.

Environment Standards

- (1) **Environmental Permits and Reporting** All required environmental permits (e.g. discharge monitoring), approvals, and registrations shall be obtained, maintained, and kept current, and their operational and reporting requirements shall be followed.
- (2) **Pollution Prevention and Resource Conservation** Emissions and discharges of pollutants and generation of waste shall be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, shall be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.
- (3) **Hazardous Substances** Chemicals, waste, and other materials posing a hazard to humans, or the environment shall be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Hazardous waste data shall be tracked and documented.
- (4) **Solid Waste** Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Waste data shall be tracked and documented.
- (5) **Air Emissions** Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations shall be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone- depleting substances shall be effectively managed in accordance with the "Montreal Protocol" and applicable regulations. Suppliers shall conduct routine monitoring of the performance of its air emission control systems.
- (6) **Materials Restrictions** Suppliers shall adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in

products and manufacturing, including labeling for recycling and disposal.

- (7) **Water Management** Suppliers shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater shall be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Suppliers shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.
- (8) **Energy Consumption and Greenhouse Gas Emissions** Suppliers shall establish a comprehensive internal energy management system, either through self-declaration or by obtaining third-party certification in accordance with ISO 50001, to ensure systematic energy management and continuous improvement of energy performance. In addition, suppliers shall conduct organization-level greenhouse gas inventories and regularly review GHG emissions. Suppliers shall comprehensively track, record, and publicly disclose energy consumption, energy performance improvements, and greenhouse gas emissions data from Scope 1, Scope 2, and significant categories within Scope 3. Furthermore, suppliers shall set absolute greenhouse gas reduction targets covering the entire enterprise, establish concrete reduction policies and action plans targeting energy consumption, and progressively integrate the use of renewable energy into corporate strategies and operational planning.
- (9) **Biodiversity and No-Deforestation** Suppliers shall avoid engaging in any type of deforestation activities or operating near nationally critical biodiversity areas. If operational activities are located near such areas, suppliers shall comply with relevant national regulations, conduct environmental impact assessments, and implement appropriate preventive, mitigation, and restoration measures to minimize ecological impacts, thereby collectively protecting biodiversity.

D. Ethics

To conduct social responsibility and achieve success in the market, suppliers and their agents shall adhere to the highest ethical standards, including:

- (1) **Business Integrity** The highest standards of integrity shall be upheld in all business interactions. Suppliers shall adopt a zero-tolerance policy to prohibit all forms of bribery, corruption, extortion, embezzlement.
- (2) **No Improper Advantage** Bribes or other means of obtaining undue or improper

advantage shall not be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

- (3) **Disclosure of Information** All business dealings shall be transparently performed and accurately reflected on company's business records. Information regarding company's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance shall be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.
- (4) **Intellectual Property** Intellectual property rights shall be respected. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information shall be safeguarded.
- (5) **Fair Business, Advertising and Competition** Standards of fair business, advertising, and competition shall be upheld.
- (6) **Protection of Identity and Non-Retaliation** Programs that ensure the confidentiality, anonymity, including any disclosures of improper conduct by company employees, managers, or public officials and government agencies, and protection of supplier and employee whistleblowers shall be maintained, unless prohibited by law. Suppliers shall have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.
- (7) **Responsible Sourcing of Minerals** Suppliers shall commit to fulfilling social and environmental responsibilities and support and adhere to the Responsible Minerals Initiative (RMI), refraining from the use of conflict minerals extracted through human rights abuses or armed coercion, particularly gold (Au), tantalum (Ta), tungsten (W), tin (Sn), cobalt (Co), and their derivatives sourced from the Democratic Republic of Congo and neighboring countries. Suppliers shall agree to notify us and provide evidence to assist in verifying mineral sources and related production and sales monitoring processes to reasonably assure that they are sourced in a way consistent with the Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas or an equivalent and recognized due diligence framework.
- (8) **Privacy** Suppliers shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers,

consumers, and employees. Suppliers shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

E. Management Systems

Suppliers shall adopt or establish a management system whose scope is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement. The management system shall include the following elements:

- (1) **Company Commitment** Suppliers shall establish human rights, health and safety, environmental and ethics policy statements affirming company's commitment to due diligence and continual improvement, endorsed by executive management. Policy statements shall be made public and communicated to workers in a language they understand via accessible channels.
- (2) **Management Accountability and Responsibility** Suppliers shall clearly identify senior executives and company representatives responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis.
- (3) **Legal and Customer Requirements** Suppliers shall adopt or establish a process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.
- (4) **Risk Assessment and Risk Management** Suppliers shall adopt or establish a process to identify the legal compliance, environmental, health and safety, labor practice and ethics risks, including the risks of severe human rights and environmental impacts, associated with company's operations. Suppliers shall determine the relative significance for each risk and implement appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.
- (5) **Improvement Objectives** Suppliers shall establish written performance objectives, targets and implementation plans to improve the company's social, environmental, and health and safety performance, including a periodic assessment of the company's performance in achieving those objectives.

- (6) **Training** Suppliers shall establish programs for training managers and workers to implement the company's policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.
- (7) **Communication** Suppliers shall establish process for communicating clear and accurate information about the company's policies, practices, expectations, and performance to workers, suppliers, and customers.
- (8) **Worker/Stakeholder Engagement and Access To Remedy** Suppliers shall establish processes for ongoing two-way communication with workers, their representatives, and other stakeholders where relevant or necessary. The process shall aim to obtain feedback on operational practices and conditions covered by this Code, and to foster continuous improvement. Workers shall be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.
- (9) **Audits and Assessments** Suppliers shall conduct periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.
- (10) **Corrective Action Process** Suppliers shall establish a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.
- (11) **Documentation and Records** Suppliers shall create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.
- (12) **Supplier Responsibility** Suppliers shall establish a process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code.

Date of Amendments

This code of conduct was established on August 1, 2025.

References

1. [Responsible Business Alliance \(RBA\) Code of Conduct](#)
2. [The UN Global Compact](#)
3. [The ILO Declaration on Fundamental Principles and Rights at Work](#)
4. [The UN Universal Declaration of Human Rights](#)
5. [OECD Due Diligence Guidance for Responsible Business Conduct](#)
6. [The UN Guiding Principles on Business and Human Rights](#)



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