



PFL SUPPLIER MANAGEMENT PROGRAM

SUPPLIER CODE OF CONDUCT

At PFL Tech, Inc. (“PFL”), we are dedicated to exceeding our customers’ expectations. We accomplish this goal, in part, through strong collaborative partnerships with Suppliers who share our commitment to uphold the highest standards of integrity, values, and operating principles.

Our Supplier Code of Conduct (“Supplier Code”) outlines PFL’s expectations and guidelines with respect to responsible sourcing including our commitments to human rights, the environment, health and safety, business ethics and the development of a diverse and sustainable supply chain. The Supplier Code applies to all contracted “Suppliers” that provide goods or services to or on behalf of PFL.

PFL expects its Suppliers to uphold this commitment by adopting, policies, procedures and training to uphold the standards and expectations set forth in this Supplier Code within their own business operations and complying with all applicable national, state, and local laws/regulations in the markets where they operate.

By acceptance of any purchase order from PFL, Suppliers acknowledge acceptance of and intention to comply with this Supplier Code.

RESPONSIBILITIES OF A PFL SUPPLIER

LABOR AND HUMAN RIGHTS

PFL believes that all workers should be treated with dignity and fairness in an ethical manner in the workplace throughout the supply chain. PFL suppliers are expected to uphold this commitment to human rights.

1) Anti – Discrimination

Suppliers must not engage in discriminating against any worker based on race, religion, religious practices, creed, color, national origin, sex, sexual orientation (including gender identity), marital status, age, physical or mental disability, medical condition, genetic information, ancestry, veteran status, or any other characteristic protected by law, in hiring and other employment practices. Suppliers shall not require medical tests including pregnancy tests unless such tests are required by law or regulations for safety reasons.

2) Anti-Harassment

Suppliers must treat all workers humanely and with respect and commit to a workplace free of harassment. Suppliers may not subject workers to corporal punishment, physical, sexual, psychological, or verbal harassment. Suppliers may not threaten workers with monetary fines as a means of discipline.

3) Child Labor

Suppliers must not employ child labor in manufacturing. In the absence of local law, suppliers shall not employ workers under the age of 15 years of age. Further, workers under the age of 18 years of age shall not be required to perform work likely to jeopardize their health, or safety, including night shifts and overtime.

4) Forced Labor and Human Trafficking

Suppliers must not participate in any form of slave, forced, bonded, indentured, or prison labor. Suppliers must not participate in human trafficking, or any form of involuntary labor, including but not limited to the transportation, recruitment, and employment of individuals by means of threat, fraud, abduction, or payments to any individual having control over another individual for the purpose of exploitation or abuse.

5) Third Party Employment Agencies

Suppliers must ensure that third party recruitment agencies are compliant with the provisions of this Supplier Code and all applicable legal requirements and be responsible for any payment for all recruitment-related fees and expenses. If such fees are found to have been paid by the workers, they must be repaid to the workers.

6) Compensation, Benefits, and Working Hours

Suppliers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Suppliers must

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compensate workers for overtime work at pay rates greater than regular hourly rates. All workers must be provided written information about their employment conditions in a language that is understandable to them. Suppliers are not permitted to deduct wages as a disciplinary measure, nor will any deductions from wages not provided for by national or local law be permitted without express, written permission of the worker concerned. All temporary and outsourced labor shall be within the limits of the local law.

A workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers must be allowed at least one day off every seven days. Suppliers must follow all applicable laws and regulations regarding working hours and days off. All overtime must be voluntary.

7) Freedom of Association

Supplier must respect the right of all workers to associate with others, form and join, (or refrain from joining), organizations of their own choosing, and bargain collectively, without fear of interference, discrimination, retaliation, or harassment.

HEALTH AND SAFETY

Suppliers are expected to provide workers with a safe and healthy work environment. Suppliers must take proactive measures to minimize the incidence of work-related injury and illness by integrating prudent health and safety management practices into its business.

8) Occupational Health and Safety

Suppliers must identify, assess, and manage occupational health and safety hazards through proper design, engineering and administrative controls, preventative maintenance, and safety training.

9) Environment, Environmental Permits and Reporting

Suppliers must be committed to sustainability in its operations. Suppliers are expected to comply with all applicable environmental laws and regulations regarding hazardous materials, air emissions, waste, and wastewater discharges, including the manufacture, transportation, storage, disposal, and release to the environment of such materials.

Supplier must obtain, maintain, and keep current all required environmental permit and registrations and follow the operational and reporting requirements of such permits.

10) Working and Living Conditions

Suppliers must provide workers with reasonably accessible clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Supplier or a third-party must be maintained clean and

RESPONSIBILITIES OF A PFL SUPPLIER

safe, and provided with reasonable living space.

11) Health and Safety Communication

Suppliers must provide workers with appropriate workplace health and safety information and training in their primary language. Health and safety related information shall be clearly posted in the facility. Workers must be encouraged to raise safety concerns.

ETHICS

PFL expects Suppliers to conduct all aspects of its business with integrity and in an ethical manner, including sourcing, relationships, and operations.

12) Responsible Sourcing of Materials

Suppliers must exercise due diligence on the materials in their supply chains, to include developing policies and procedures to identify applicable risks and take appropriate steps as necessary to mitigate them. Suppliers are expected to supply conflict-free materials and products. Therefore, Suppliers must conduct due diligence to reasonably ensure that their products do not directly or indirectly finance or benefit armed groups or contribute to serious human rights abuses, or severe health and safety risks and negative environmental impacts.

13) Trade Compliance and Export Controls

Suppliers are expected to comply with all applicable trade laws, as well as, the applicable export, re-export, and import regulations associated with the countries in which they do business. Suppliers should not participate in international boycotts that are not sanctioned by the United States government or applicable laws.

Suppliers must not directly or indirectly provide any goods or services from a country, person or entity that is subject to U.S. and other regional, unilateral, and multilateral regulations that restrict transaction with specific foreign entities, persons, or countries (often referred to as denied, debarred, and/or restricted parties). Suppliers must implement due diligence compliance practices to screen Suppliers' employees, customers, suppliers, vendors, agents and other business associates, including all parties in each transaction such as banks, insurance companies, shipping lines, and freight forwarders to ensure compliance with applicable laws and regulations concerning embargoes and sanctions.

14) Privacy

Suppliers are committed to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

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15) Business Integrity

Suppliers must uphold the highest standards of integrity in all business interactions. They must not engage in bribery, corruption, extortion, or embezzlement to obtain an unfair or improper advantage. Suppliers must abide by all applicable anti-corruption laws and conventions. Further, Suppliers are also responsible for ensuring that any third party they engage agrees to abide by business integrity standards that are no less stringent than this Code.

16) Gifts and Gratuities

Suppliers should avoid giving or receiving gifts to and from PFL employees because even well-intentioned gifts might be considered a bribe under certain circumstances or create conflicts of interest. Gifts and entertainment must not be offered near a major business decision or in an attempt to gain special treatment. Cash is never acceptable. Any such gift must abide by PFL's policies. See the PFL Code of Conduct.

17) Improper Payments

Bribes, kickbacks, and similar payments are strictly forbidden. These payments are prohibited even when local laws may allow such activity.

18) Conflicts of Interest

Suppliers must avoid actual or even the appearance of conflicts of interests with PFL. Suppliers must not conduct business directly with any PFL employee whose spouse, domestic partner, or other family member or relative holds a significant financial interest in the Supplier. In the course of negotiating the Supplier agreement or performing the Supplier's obligations to PFL, dealing directly with a Supplier's spouse, domestic partner or other family member or relative employed by PFL is also prohibited.

19) Insider Trading

Suppliers must avoid the disclosure of any nonpublic information acquired about PFL or another company's securities that could influence an investor's decision to buy or sell the security and should avoid insider trading by not buying or selling such securities when in possession of this information.

20) Business Records

Suppliers must accurately and honestly record and report all business information to appropriate parties regarding labor, health and safety, environmental practices and comply with all applicable laws regarding their completion and accuracy.

21) Protection of Intellectual Property

Supplier shall respect intellectual property rights and safeguard information of PFL and third parties.

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DIVERSITY

Diversity amongst our Suppliers is welcome at PFL as we desire for diversity and inclusion in all areas of our business, not just within our organizational walls. When possible, PFL may be able to work with Suppliers that represent different genders, various nationalities, ethnicities, religions, sexual orientations, as well as all types of disabilities. We believe that it is important to do business with Suppliers who represent the diversity of our employees, communities, and the customers we serve.

MANAGEMENT SYSTEMS

Suppliers must adopt or establish a system to manage the elements of this Supplier Code, and the law, identify and mitigate related operational risks, and facilitate continuous improvement. Suppliers must identify company representatives responsible for ensuring implementation and periodic review of its management systems. Suppliers must maintain appropriate documents and records to ensure regulatory compliance.