

Dear Suppliers,

At SEL, making electric power safer, more reliable, and more economical is at the core of everything we do. But we don't achieve this mission alone. Every day, we partner with hundreds of customers and suppliers who help us keep electric power flowing to people around the world.

Just as we are committed to using the highest quality components in our products and hiring the best people to invent, design, and build them, we also endeavor to partner with others who not only believe in our mission but share our values—which SEL Founder and President Dr. Schweitzer aptly describes as “doing business the way our mothers would want us to.”

The attached Supplier Code of Conduct and Responsible Purchasing Principles offers a more formal and detailed guide to the values and principles that we adhere to and ask our partners to practice, as well.

Thank you.

Sincerely,



David E. Whitehead
Chief Executive Officer

SEL Supplier Code of Conduct and Responsible Purchasing Principles

SEL adheres to the highest standards of ethical, social, and environmental practices. The philosophies and values in SEL's Principles of Operations guide our business activities. SEL expects all suppliers to operate in accordance with the principles and requirements, as applicable, in this SEL Supplier Code of Conduct ("Code") and in compliance with all applicable laws and regulations. This Code applies not only to SEL's suppliers as businesses, but also to our supplier's employees performing work on behalf of SEL. SEL may terminate its business relationship with any supplier that violates the principles set forth in this Code.

Labor and Human Rights

SEL expects its suppliers to support and protect human rights in the workplace, to comply with all applicable labor and immigration laws, and to ensure that all workers are treated with dignity and respect and provided with safe and humane working conditions. Expectations include the following:

- **Freely Chosen Employment:** Suppliers shall ensure that all work is voluntary and that all members of the workforce shall be free to leave the workplace or to terminate their employment at any time. Suppliers shall not use nor contribute to slavery, servitude, forced or compulsory labor, and human trafficking. Workers shall not be required to surrender any original government-issued identification, travel documents or work permits as a condition of employment.
- **Child Labor:** Suppliers shall not employ any workers under the minimum legal age for employment in the country or under the age for completing compulsory education, whichever is greatest. Suppliers may use legitimate workplace apprenticeship programs such as student internships. Workers under the age of 18 shall not perform work that may expose them to hazards, including night shifts and overtime.
- **Working Hours:** Suppliers shall not require workers to work beyond daily and weekly work hours limits set by local law. Workers shall be allowed at least one day off every seven days.
- **Wages and Benefits:** Wage payments and benefits must comply with all applicable laws and regulations. Suppliers shall supply workers in a timely manner with pay stubs or similar documentation informing workers on the basis on which they are paid.
- **Harassment and Discrimination:** Suppliers shall commit to a workplace free of harassment and unlawful discrimination. Suppliers shall not discriminate in screening, hiring, or employment practices based on race, color, age, sex, gender, gender identity and expression, sexual orientation, marital status, ethnicity, national origin, disability, genetic information, medical condition, pregnancy, religion, political affiliation, union membership, or covered veteran status.
- **Freedom of Association:** Suppliers shall allow workers to associate freely with others, form, and join (or refrain from joining) organizations of their choice, and bargain collectively, without interference, discrimination, or retaliation.

Health and Safety

The safety of the public, employees, and suppliers is SEL's highest priority. Suppliers shall provide and maintain a safe work environment including complying with the basic safety and health expectations including the requirements set forth below.

- **Occupational Health and Safety:** Suppliers shall comply with all applicable statutory and international standards regarding occupational health and safety. Suppliers shall identify, evaluate, and manage occupational health and safety hazards through a prioritized process of hazard elimination, substitution, engineering controls, administrative controls, and/or personal protective equipment.
- **Emergency Preparedness:** Suppliers shall identify and assess potential emergency situations and develop emergency plans and response procedures that will minimize harm to life, environment, and property.
- **Occupational Injury and Illness:** Suppliers shall have procedures in place for workers to report occupational injuries or illness and a system in place to track and record them and to ensure that any necessary medical treatment is provided. Suppliers shall implement corrective action plans to mitigate risks and to facilitate workers' return to work.
- **Working and Living Conditions:** Suppliers shall provide workers with reasonably accessible clean toilet facilities and potable water. Any supplier-provided eating facilities, food preparation, or storage facilities must be sanitary, and any work dormitories provide by suppliers to workers must be clean and safe and provide reasonable living space.
- **Health and Safety Communication:** Suppliers shall provide workers with health and safety information and training in their primary language or in a language they can understand and shall post or make the information easily accessible to workers.

Environmental Sustainability

SEL is committed to continuous improvement and the responsible use of environmental resources including water, energy, materials and land and we actively seek suppliers that share this mission. We expect suppliers to comply with all applicable statutory and international standards including the following:

- **Environmental Protection:** Suppliers shall develop, implement, and maintain environmentally responsible business practices and take steps to reduce the impacts of their work to water, air, land, and areas protected for their biological, cultural, and unique or valued scenic features.
- **Regulatory Compliance:** Suppliers must obtain and keep current all required environmental permits, approvals, and registrations and comply with all reporting requirements.

Ethics and Compliance

SEL expects its suppliers to conduct their business with the highest ethical standards and in compliance with all legal requirements, including the following:

- **Anti-corruption and Bribery:** Suppliers shall refrain from all forms of corruption, extortion, embezzlement, fraud, or bribery including ensuring that payments made to customers (including SEL), government officials, and any other party comply with all applicable anti-bribery laws.

- **Fair Business, Advertising and Competition:** Suppliers shall comply with all laws and standards of fair business, advertising, and competition including not participating in price fixing or bid rigging with competitors.
- **Intellectual Property:** Suppliers shall respect intellectual property rights of others.
- **Security and Privacy:** Suppliers shall maintain a comprehensive physical and cyber security program. Suppliers shall perform continuous monitoring, risk assessment, and remediation consistent with all relevant industry and international standards. Suppliers shall protect confidential information and the privacy of personal information of everyone with whom they do business and will comply with all laws regarding collecting, storing, processing, transmitting, or sharing of personal information.
- **Conflicts of Interest:** Suppliers should avoid situations that could affect their ability to act in a fair and unbiased way and must disclose any real or perceived conflicts of interest.
- **Whistleblower Protection:** Suppliers shall provide a complaint mechanism for workers to report workplace grievances. Suppliers shall protect whistleblower confidentiality and prohibit retaliation.
- **Trade Compliance:** Suppliers shall comply with all applicable export control and customs regulations.
- **Responsible Sourcing of Minerals:** Suppliers shall take reasonable efforts to avoid in their products the use of raw materials which originate from Conflict-Affected and High-Risk Areas and that contribute to human rights abuses.
- **Supply Chain Security:** Suppliers shall ensure that they have comprehensive security practices across their supply chain and shall constantly seek to reduce and mitigate supply chain risk.
- **Community Engagement:** Suppliers are encouraged to contribute to the development and sustainability of the communities in which they operate.

Management System

Suppliers are expected to implement or maintain, as applicable, management systems that are designed to ensure compliance with this Code and with all applicable laws and regulations, to identify and mitigate related operational risks, and to facilitate continuous improvement.