



Introduction

Headwall Photonics is committed to conducting business ethically, sustainably, and responsibly. We expect the same from our suppliers, who play a crucial role in ensuring that our products and services meet the high standards of quality and integrity that our customers expect from us.

This Supplier Code of Conduct Policy outlines the standards and expectations that we have of our suppliers with respect to their conduct, including labor practices, environmental management, ethics and compliance, and supply chain responsibility. It applies to all suppliers who provide goods and/or services to Headwall Photonics.

Compliance with Laws and Regulations

Suppliers shall comply with all applicable laws and regulations in the jurisdictions in which they operate, including but not limited to labor laws, health and safety regulations, environmental protection laws, and anti-corruption laws. Suppliers shall also comply with international human rights standards and respect the rights of their employees, including the right to freedom of association, the right to collective bargaining, the prohibition of forced labor, and the prohibition of child labor.

Labor and Human Rights

Suppliers shall respect the human rights of their employees and provide a safe, healthy, and nondiscriminatory work environment. Suppliers shall ensure that their employees work voluntarily and are paid fairly for their work, and that working hours and conditions are in compliance with local laws and industry standards. Suppliers shall not engage in any form of forced labor, including bonded labor, indentured labor, or any other form of involuntary labor. Suppliers shall also prohibit child labor and ensure that no one under the legal age of employment is employed, as defined by applicable laws and regulations.

Environmental Protection

Suppliers shall demonstrate a commitment to environmental sustainability and minimize their environmental impact by implementing and adhering to environmentally responsible practices. Suppliers shall comply with all applicable environmental laws and regulations and strive to minimize the use of natural resources, reduce emissions and waste, and prevent pollution. Suppliers shall also take measures to reduce their carbon footprint and promote sustainable practices in their operations.

Ethics and Anti-Corruption

Suppliers shall conduct their business ethically, transparently, and in compliance with applicable laws and regulations. Suppliers shall not offer, give, or receive any bribes or kickbacks, or engage in any other form of corruption or unethical behavior. Suppliers shall maintain accurate and complete records of all transactions and comply with all applicable laws and regulations related to accounting, reporting, and disclosure.



Data Privacy and Information Security

Suppliers shall protect the confidentiality, integrity, and availability of any data or information they receive from or transmit to Headwall Photonics and shall comply with all applicable data protection and privacy laws. Suppliers shall take appropriate measures to safeguard information against unauthorized access, disclosure, or use, and shall notify Headwall Photonics promptly in the event of any suspected or actual security breach.

Supply Chain Responsibility

Suppliers shall ensure that their own suppliers and subcontractors also adhere to the standards set out in this code of conduct policy. Suppliers shall implement due diligence processes to identify and manage risks in their supply chains, including risks related to labor practices, environmental sustainability, ethics and compliance, and data privacy and security. Suppliers shall ensure their purchasing policies mitigate the risk of the purchase, acceptance, and distribution of counterfeit parts.

Reporting and Remediation

Suppliers shall promptly report any suspected or actual violations of this code of conduct policy to Headwall Photonics and cooperate with any investigations. Suppliers shall also take appropriate corrective action to remedy any violations. Failure to comply with this policy may result in termination of the supplier relationship.

Conclusion

At Headwall Photonics we are committed to working with suppliers who share our values and our commitment to ethical, sustainable, and responsible business practices. We expect our suppliers to comply with this code of conduct policy and to continually strive to improve their environmental and social performance. Together, we can build a sustainable and ethical supply chain.