



# Navitas Supplier Code of Conduct

## Introduction:

This Supplier Code of Conduct sets forth the ethical, social, and environmental standards that suppliers must adhere to when conducting business with Navitas. We expect our suppliers to share our commitment to sustainability, responsible business practices, and respect for human rights. This code establishes a framework for maintaining a responsible supply chain and fostering long-term partnerships with suppliers who uphold the highest standards of integrity.

The Code embodies the principles outlined in the Responsible Business Alliance (formerly the Electronic Industry Citizenship Coalition) (“RBA”) Code of Conduct, Version 7.0. Navitas is committed to support the rights and wellbeing of workers and communities worldwide affected by the global electronics supply chain.

Navitas suppliers shall comply with the requirements in this Code, and require its own suppliers do the same. Navitas may visit (and/or have external monitors visit) Supplier facilities to assess compliance with this Code. Violation of this Code may result in an immediate termination of the relationship with Navitas. Additionally, any such violation may result in legal action.

By complying with this code, suppliers demonstrate their dedication to ethical conduct and contribute to the overall success of Navitas and suppliers.

## Compliance with Laws and Regulations:

Suppliers must comply with all applicable local, national, and international laws and regulations governing their business operations. This includes but is not limited to:

1. **Labor Laws:** Suppliers must adhere to laws regarding minimum wage, working hours, overtime compensation, and employee benefits. They should ensure fair and equal treatment of workers, including provisions for contract labor and temporary workers.
2. **Environmental Regulations:** Suppliers must comply with environmental laws and regulations pertaining to waste management, emissions control, pollution prevention, and natural resource conservation.
3. **Health and Safety Standards:** Suppliers must provide a safe and healthy work environment, including compliance with occupational health and safety laws, hazard identification, risk assessment, and implementation of appropriate controls.
4. **Anti-Corruption Laws:** Suppliers must uphold high ethical standards and comply with anti-corruption laws, including refraining from bribery, extortion, embezzlement, and other corrupt practices.
5. **Human Rights Legislation:** Suppliers must respect and protect human rights as outlined in

international conventions and standards, including the United Nations Universal Declaration of Human Rights.

## **Labor and Human Rights:**

1. **Forced Labor and Human Trafficking:** Suppliers must not use any form of forced, bonded, or involuntary labor. This includes prohibiting human trafficking and engaging in due diligence to ensure that workers are not subjected to coercion or exploitation.
2. **Child Labor:** Suppliers shall not employ workers below the legal working age as defined by applicable laws and international conventions. They should provide age verification mechanisms and maintain appropriate records to ensure compliance.
3. **Non-Discrimination and Equal Opportunities:** Suppliers must treat all workers with dignity and respect, irrespective of their race, color, gender, age, religion, national origin, disability, sexual orientation, or any other protected characteristic. They must provide equal opportunities for employment, promotion, training, and compensation.
4. **Working Conditions:** Suppliers must provide safe and hygienic working conditions, ensuring adequate ventilation, lighting, and sanitation facilities. They should comply with occupational health and safety regulations and promote employee well-being.
5. **Freedom of Association:** Suppliers shall respect the rights of workers to freely associate, join trade unions, and engage in collective bargaining activities as permitted by local laws. Suppliers should not discriminate against workers based on their union membership.

## **Health and Safety:**

Suppliers must provide a safe and healthy work environment for their employees, contractors, and visitors.

This includes:

1. **Risk Assessment and Management:** Suppliers should conduct regular assessments to identify workplace hazards and implement appropriate controls to mitigate risks.
2. **Training and Education:** Suppliers must provide employees with the necessary health and safety training, education, and resources to ensure they can perform their work safely.
3. **Emergency Preparedness:** Suppliers should establish emergency response procedures, including evacuation plans, first aid provisions, and training, to address potential emergencies and ensure the well-being of workers.
4. **Ergonomics:** Suppliers should strive to provide ergonomic working conditions and equipment to prevent occupational injuries and promote employee well-being.

## **Environmental Responsibility:**

Suppliers should minimize their environmental impact and promote sustainability in their operations. This includes:

1. **Resource Conservation:** Suppliers should implement measures to conserve energy, water, and other natural resources, considering efficient production processes, recycling, and waste reduction

practices.

2. **Pollution Prevention:** Suppliers must minimize their environmental impact by adopting pollution prevention techniques, managing hazardous substances responsibly, and ensuring proper disposal of waste.
3. **Sustainable Materials and Supply Chain:** Suppliers should strive to use environmentally friendly materials, promote sustainable sourcing practices, and encourage their own suppliers and subcontractors to adopt responsible environmental practices.
4. **Biodiversity and Ecosystem Protection:** Suppliers should be aware of potential impacts on biodiversity and ecosystems and take measures to protect and preserve them, particularly when operating in environmentally sensitive areas.

## **Ethical Business Practices:**

Suppliers must uphold the highest standards of business ethics and integrity. This includes:

1. **Anti-Corruption:** Suppliers must prohibit bribery, corruption, and any other unethical practices. They should implement measures to prevent conflicts of interest, ensure transparent business transactions, and maintain accurate records.
2. **Fair Competition:** Suppliers must comply with competition laws and regulations, avoiding anti-competitive practices such as price fixing, bid rigging, or market allocation. They should promote fair and open competition in their respective markets.
3. **Intellectual Property Rights:** Suppliers must respect intellectual property rights and refrain from infringing on patents, copyrights, trademarks, or trade secrets of others. They should protect confidential information and use it only for legitimate business purposes.
4. **Supply Chain Transparency:** Suppliers should strive for transparency and traceability within their supply chains by disclosing the origin of products, components, and materials used in their manufacturing processes. They should encourage their own suppliers and subcontractors to uphold similar transparency standards.
5. Suppliers shall have a policy to reasonably assure that the minerals used for the products they manufacture does not directly or indirectly finance or benefit armed groups or contribute to serious human rights abuses in Conflict-Affected or High-Risk Areas. Suppliers shall exercise due-diligence on the source and chain of custody of these minerals in accordance with a recognized due diligence framework, and shall make their due diligence measures available to Navitas upon request.

## **Supply Chain Management and Auditing:**

Suppliers should establish mechanisms to ensure supply chain compliance by:

1. **Supplier Assessment:** Suppliers should conduct due diligence on their own suppliers and subcontractors to verify their compliance with applicable laws, regulations, and this code of conduct.
2. **Auditing and Monitoring:** Suppliers must establish auditing processes to evaluate compliance with this code and identify areas for improvement. They should conduct regular audits of their facilities and operations, making the results available to Navitas upon request.
3. **Continuous Improvement:** Suppliers are expected to take corrective actions promptly to address any

non-compliance issues identified during audits or through other means. They should implement preventive measures to avoid future violations and strive for continuous improvement in their sustainability performance.

### **Reporting and Compliance:**

Suppliers shall establish mechanisms to monitor and enforce compliance with this code of conduct. They should have procedures in place to address any violations or concerns promptly and appropriately. Suppliers are encouraged to report any suspected violations of this code to Navitas.

### **Conclusion:**

This Supplier Code of Conduct represents our commitment to responsible business practices, sustainability, and ethical conduct throughout the supply chain. By adhering to this code, suppliers play a crucial role in maintaining the integrity of our products and services. We expect suppliers to not only comply with these standards but also actively engage in continuous improvement, fostering a culture of transparency, fairness, and respect. We expect suppliers to continuously improve their performance and work collaboratively with us to address any challenges and promote a culture of responsible and sustainable business practices.

## References

The following standards have been used in preparing this Code and may be useful sources of additional information.

- Dodd-Frank Wall Street Reform and Consumer Protection Act  
<http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf>
- Eco Management & Audit System  
[www.quality.co.uk/emas.htm](http://www.quality.co.uk/emas.htm)
- Ethical Trading Initiative  
[www.ethicaltrade.org/](http://www.ethicaltrade.org/)
- ILO Code of Practice in Safety and Health  
[www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf](http://www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf)
- ILO International Labor Standards  
[www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm](http://www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm)
- ISO 14001  
[www.iso.org](http://www.iso.org)
- National Fire Protection Agency  
[www.nfpa.org/catalog/home/AboutNFPA/index.asp](http://www.nfpa.org/catalog/home/AboutNFPA/index.asp)
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High Risk Areas  
[www.oecd.org/corporate/mne/mining.htm](http://www.oecd.org/corporate/mne/mining.htm)
- OECD Guidelines for Multinational Enterprises  
[www.oecd.org/mne/](http://www.oecd.org/mne/)
- OHSAS 18001  
[www.bsigroup.com/en-GB/ohsas-18001-occupational-health-and-safety/](http://www.bsigroup.com/en-GB/ohsas-18001-occupational-health-and-safety/)
- Responsible Business Alliance (Formerly the Electronic Industry Citizenship Coalition)  
<http://www.responsiblebusiness.org/> Code of Conduct
- SA 8000  
[www.cepaa.org](http://www.cepaa.org)
- Social Accountability International (SAI)  
[www.sa-intl.org](http://www.sa-intl.org)
- Universal Declaration of Human Rights  
[www.un.org/Overview/rights.html](http://www.un.org/Overview/rights.html)
- United Nations Convention Against Corruption  
[www.unodc.org/unodc/en/treaties/CAC/](http://www.unodc.org/unodc/en/treaties/CAC/)
- United Nations Global Compact  
[www.unglobalcompact.org](http://www.unglobalcompact.org)
- United States Federal Acquisition Regulation  
[www.acquisition.gov/far/](http://www.acquisition.gov/far/)