Supplier Code of Ethics Policy

OnProcess Technology, Inc. (the Company) is committed to the highest standards of service quality and business integrity, and requires its Suppliers and employees to conduct themselves with the highest standards of honesty, fairness, and integrity, avoiding even the appearance of impropriety.

In performance of services on behalf of the Company, Suppliers shall ensure that it and its employees and subcontractors act in accordance with this Supplier Code of Ethics Policy (Policy) and that they understand and comply with the Company’s Code of Business Conduct and Ethics.

Failure to adhere to this Policy may result in termination of existing business with the Company and/or disqualification from consideration for future business.

This Policy sets out the minimum requirements of acceptable conduct by the Company’s Suppliers. The Company strongly encourage Suppliers to exceed the minimum requirements of this Policy and to promote best practices and continuous improvement throughout their operations.

Compliance with Law

Supplier shall comply with all laws and regulations applicable to it and its dealings with the Company, including employment laws prohibiting discrimination and harassment. In the event of a conflict between this Policy and applicable law, applicable law will govern.

Conflicts of Interest

Supplier shall disclose to the Company all relationships that have a potential to create a conflict of interest or the appearance of a conflict of interest. A conflict of interest arises when a Company employee’s personal interest interferes with the best interests of the Company. It may occur when an employee or a family member or friend receives a personal benefit because of the employee’s position with the Company. Supplier shall take steps to correct any actual or perceived conflict of interest.

Anti-Bribery/Anti-Corruption

The Company is committed to doing business in compliance with the highest anti-bribery/anti-corruption standards. Supplier shall comply with all applicable anti-corruption and bribery laws, including the U.S. Foreign Corrupt Practices Act, as well as the Company’s Anti-Bribery and Corruption Policy. Supplier shall not engage or attempt to engage in bribery, extortion, or embezzlement. Supplier shall conduct itself with honesty, fairness, and high ethical standards, avoiding even the appearance of impropriety in its business practices.

Gifts, Travel, and Entertainment

Supplier shall not provide (directly or indirectly) any gift, travel, entertainment, political contribution, or charitable donation of any value to a Company employee or any third party on behalf of the Company. Supplier may offer a Company employee a gift, travel, or entertainment only if it is: (i) appropriate (no cash or cash equivalents or other excluded gift type), does not create an actual impropriety or a perception of
impropriety, and complies with all laws, regulations, and policies for all parties), (ii) of reasonable value, and (iii) fully transparent with respect to its value.

**Fair Business Practices**

The Company is committed to competing fairly and in compliance with the antitrust and competition laws in every country where it does business. Supplier shall comply with all applicable fair business, advertising, and antitrust competition laws, and shall not fix prices, rig bids, or exchange current, recent, or future pricing information with Supplier’s competitors.

**Health & Safety**

The Company is committed to providing healthy and safe working conditions, promoting and enhancing safety as a work culture, and preventing loss or human injury. Suppliers operations shall comply with all applicable health and safety regulations, providing a work environment that is safe and secure and promotes the highest standards of health and safety.

**Environmental Sustainability**

The Company strives to operate its business in a manner that protects the environment and resources by managing the life cycle of our products, solutions, and services in an environmentally responsible manner and maintaining full compliance with applicable environmental laws, regulations, and other obligations. Suppliers shall conduct their own business in a manner consistent with the Company’s sustainability principles and work in a systematic, goal-oriented, and proactive manner to reduce the impact to the environment.

**Intellectual Property Rights, Privacy, and Data Protection**

Supplier shall comply with all applicable intellectual property rights and shall only use information technology and software that it has legitimately acquired or licensed. Supplier shall respect the reasonable privacy and confidentiality expectations of those with whom it does business and shall protect all data that may come into its possession because of its relationship with the Company, including data relating to the Company and the Company’s employees and customers. Supplier shall comply with the Company’s instructions and with applicable privacy, data protection, and security laws and regulations when personal, confidential, proprietary, or other sensitive information is collected, stored, processed, transmitted, or shared by Supplier or its subcontractors.

**Human Rights**

The Company has a long-standing commitment to human rights for all people. The Company upholds and respects human rights as contained in the United Nations Universal Declaration of Human Rights. Supplier shall conduct business in accordance with all applicable global and local human rights laws. Additionally, Supplier shall follow responsible business practices that do not infringe on human rights and support the Company’s efforts to meet its human rights commitments.

**Notice of Ethical Concerns**

Supplier shall promptly notify the Company regarding any known or suspected illegal or improper behavior relating to dealings with the Company, including behavior by the Company’s employees or agents.