

# Code of Conduct for Suppliers and Third-Party Vendors



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# Preface

Artera Services, LLC, and its subsidiaries (collectively, “Artera”) are committed to upholding high ethical standards at all levels of its operations. We value our reputation and are committed to conducting business safely and with the highest quality and integrity. We know that our reputation is based on not just our own conduct but the conduct of those with whom we do business. We require suppliers, business partners, contractors, and other third parties (collectively, “Suppliers) to share our same commitment to ethical business practices.

The Supplier Code of Conduct outlines Artera’s minimum expectations of suppliers when working on our behalf. It is intended to promote lawful and ethical behavior and act as a guide for supplier decisions and actions when working with Artera. Any failure to comply with the following standards may result in termination for cause of the relationship with Artera. We expect our Suppliers to adopt these standards throughout their supply chains by adopting efficient management policies, procedures, and training to uphold the standards set forth in this Supplier Code of Conduct.

### Our Core Values



Safety. Quality. Commitment. Reputation.

## I. Ethical Compliance

All suppliers must conduct their business operations in an ethical manner. We expect all Suppliers to understand and employ the standards set forth in the Artera Supplier Code of Conduct.

## II. Integrity and Transparency

All Suppliers shall engage in business operations with integrity. We expect Suppliers to engage in business with Artera and with other entities with fairness and ethical conduct.

Suppliers shall avoid conflicts of interest related to financial interests or other arrangements that may be considered inappropriate. Conflicts of interest can undermine business judgment and threaten Artera's reputation, as well as that of our Suppliers. Supplier must report to Artera any instances involving actual or apparent conflicts between Supplier's interests and those of Artera.

Artera neither accepts nor gives entertainment opportunities or gifts that appear excessive or appear to influence a business decision. Sales and purchases of supplies, materials, and services must be accomplished in a manner based solely on quality, performance, and cost. The nature of any gifts or entertainment provided must not, by their quality, quantity, or timing, be used by Supplier to gain improper advantage or preferential treatment. We expect that Suppliers will maintain appropriate detailed records of exchanges of gifts and entertainment with our employees. We expect all suppliers not to engage in such behaviors and to approach all business dealings with honesty and integrity. No Suppliers shall seek to offer gifts or entertainment to government officials on behalf of Artera or one of its subsidiaries.

We expect our Suppliers to be transparent and open about issues concerning their relationship with Artera. Suppliers shall also investigate and report any concerns of violations of our guidelines or unlawful activities in the workplace or supply chain. We expect Suppliers to have controls and policies in place to handle any violations or unlawful activities. Failure to report any such violation will result in termination of contract for cause.

## III. Compliance with the Law

All Suppliers must comply with all applicable United States, international, and local laws and regulations, including domestic, foreign, local, and executive orders, in the conduct of their business activities or in connection with their relationship with Artera.

Compliance with applicable laws includes, but is not limited to, the following:

- **Anti-Bribery and Corruption:** Artera employees and Suppliers are prohibited from offering, soliciting, promising, giving, or accepting a bribe, kickback, or any other improper payment. Artera complies with all laws and regulations that prohibit bribery and corruption, and we require our Suppliers to do the same.

- **Antitrust Practices:** Artera and Suppliers must comply fully with the letter and spirit of laws designed to preserve free and open competition. The antitrust laws apply to a wide range of activities, including marketing, procurement, contracting, mergers and acquisitions, and the location and operation of our facilities. Antitrust laws are complex, and their requirements are not always obvious. Violations can lead to severe penalties and criminal sanctions. Suppliers who have any questions regarding the applicability of antitrust laws to a particular situation are encouraged to consult their own legal counsel.
- **Money Laundering:** Suppliers must comply with all applicable national and international laws and regulations related to anti-money laundering, including but not limited to the United States Bank Secrecy Act, The UK Money Laundering Regulations, and other relevant legislation in the jurisdictions where they operate.
- **Conflict Minerals:** Suppliers shall ensure that all products or materials supplied do not contain metals derived from minerals or other derivatives originating from conflict regions that directly or indirectly finance or benefit armed groups confirmed or accused of human rights abuses. In doing so, Suppliers shall not engage or encourage any organizations who are found to be supplying material from sources known or suspected to support conflict in the Democratic Republic of the Congo or any adjoining country or whose practices may inadvertently allow for sources from these regions or whose sources may be considered supportive of such abuses and to further understand their supply chain and establish an alternative source of materials which do not support such conflict.

## IV. Fair Labor Standards and Human Rights

- **Discrimination and Harassment, Forced or Child Labor, and Working Hours:** All Suppliers must treat their employees and those they conduct business with fairly and equally. Artera is committed to maintaining a workplace that is free of discrimination and harassment of any kind. We do not tolerate physical or mental abuse of any kind, including harassment, retaliation, or intimidation. Any behavior that creates an unfair or unequal environment is encouraged to be reported to management.

Artera requires that all working hours are reasonable and fairly compensated in accordance with applicable laws and regulations. Suppliers shall ensure that all employees are paid wages in compliance with applicable law and/or agreements and operate in humane work conditions. Suppliers must also ensure that all labor is voluntary and that all employment contracts are freely entered into. Artera prohibits and strongly condemns any usage of forced or child labor. Suppliers shall not engage in any action that utilizes forced or child labor in any aspect of their supply chain. Any violation of labor or compensation standards should be reported to management and communicated to Artera.

- **Whistleblowing:** The objectives of Artera’s Whistleblower Policy are to encourage and enable protected persons, without fear of retaliation, to raise concerns regarding suspected unethical and/or illegal conduct or practices on a confidential and, if desired, anonymous basis so that Artera can address and correct inappropriate conduct and actions. We expect our Suppliers to have adequate controls and procedures in place to provide proper whistleblower protections in the areas of confidentiality and retaliation.

## V. Environment, Health, Safety, and Quality

Artera is committed to ensuring a safe work environment for all affiliates, subsidiaries, employees, vendors, and suppliers. Suppliers must comply with all applicable laws and regulations, including internal guidelines, to ensure that all employees are appropriately qualified and equipped to work safely. Suppliers must ensure that all facilities, including company-owned vehicles, are maintained at a standard in accordance with applicable laws.

We expect our Suppliers to engage in sustainable and responsible business practices. Suppliers should engage in efforts to improve their environmental processes and manage the impact of their operations on the environment. Suppliers shall, at a minimum, comply with all environmental rules and regulations in the jurisdictions in which they do business.

## VI. Protection of Information, Assets, and Interests

All Suppliers are responsible for protecting the tangible and intangible property given to them by Artera during the course of the business relationship.

- **Confidentiality of Information:** Confidential information is an Artera asset, and Suppliers must protect it. Confidential information should only be shared with authorized people who “need to know.” Suppliers are expected to take adequate care to ensure that confidential information is not misused and not disclosed except when disclosure is authorized or legally mandated.
- **Cyber Security:** Suppliers shall have and comply with a data security program to include management, operational, and technical controls governing the protection of confidential information. Suppliers must comply with all U.S. state and federal laws, regulations, and other legal or self-regulatory requirements in any jurisdiction relating to data privacy, data protection, data security, communications secrecy, and data breach notification.

## VII. Diversity, Equity, and Inclusion

Artera values diversity in the workplace, one that is inclusive of all employees and Suppliers. We will not tolerate any form of prohibited harassment that is based on race, color, religion, national origin or ancestry, veteran status, disability, gender, age, marital status, sexual orientation, gender identity, genetic information, or any other characteristic protected by law. We expect all Suppliers to avoid inappropriate behavior or conduct directed toward employees, customers, vendors, or contractors that could be interpreted as sexual or other prohibited harassment while on or off Artera premises.

Artera is committed to supporting and respecting all communities across our operating territory. We ensure small, local, diverse businesses have opportunities to partner with us – including women-owned, minority-owned, service-disabled veteran-owned, veteran-owned, LGBT-owned, disability-owned, HUBZone, and small disadvantaged businesses. We expect our Suppliers to share in this commitment to Supplier Diversity by sub-contracting with small and diverse suppliers, conducting and maintaining size and diversity status verifications, and complying with reporting requirements.



# Acknowledgment Form

This document does not serve to create a contract between Artera, its affiliates or subsidiaries, and any Supplier, and no promise of any kind is made by Artera in this Code of Conduct for Suppliers and Third-Party Vendors (“Supplier Code”). Artera is free to change the terms of this Supplier Code without having to consult with or obtain the agreement of any Supplier. Nothing herein shall be interpreted as a commitment of business with any Supplier or Third-Party Vendor.

By signing below, the undersigned acknowledges that it has received a copy of the Supplier Code and the Artera Policy Against Human Trafficking and Slavery for Suppliers. As a Supplier or third-party vendor for Artera, the undersigned and its employees, representatives, suppliers, and third-party providers are responsible for knowing and adhering to the principles and standards set forth in this Supplier Code.

The undersigned further acknowledges and agrees that this Supplier Code is intended to provide a general overview of Artera’s policies and does not necessarily represent all such policies and practices in effect at any particular time. The undersigned and its employees, representatives, suppliers, and third-party providers will comply with all current and/or future versions of this Supplier Code, written policies, practices, rules, regulations, or directives issued by Artera.

The undersigned will contact the Artera Chief Legal Officer (CLO) if there are any questions concerning this Supplier Code or any behavior or situation concerning Artera. The undersigned also understands that it has a responsibility to report any violations to the CLO immediately.

Suppliers who persistently refuse to implement appropriate corrective and preventative actions or who have critical deviations against this Supplier Code will be excluded from current and future business with Artera until such deficiencies have been remediated.

\_\_\_\_\_  
Supplier/Third-Party Provider (Print)

\_\_\_\_\_  
Signature of Owner or Officer of Company

\_\_\_\_\_  
Name (Print)

\_\_\_\_\_  
Date



## **Purpose and Scope**

This Policy applies to Artera (the “Company”), its subsidiaries, and such entities’ respective directors, officers, employees, (including temporary and contract personnel), agents and representatives (as applicable). Application of this Policy to new non-wholly owned entities shall be subject to the completion of the applicable entity’s integration plan.

The International Labor Organization (ILO) and the U.N. Convention on the Rights of the Child guide our policy on child labor.

Our child labor policy is our position on employing minors and aims to ensure that our company, its subsidiaries, and everyone we’re connected with follow the law and cares for children’s interests.

## **Policy Statement**

International, local, and federal child labor laws are stricter today than they were years ago. But millions of children are still forced to work in bad conditions all around the world, even in developed countries.

As an organization, we want to do business in a legal, ethical manner, adding value to society and the environment instead of doing harm. Helping stop child labor is fundamental to us. We want to make sure that our organization doesn’t take part in children’s exploitation and helps end it to the best of our ability.

## **Definitions**

According to the International Labor Organization (ILO), Child Labor represents hazardous forms of work that disrupt the healthy development of a child. Child labor can limit or damage the physical, mental, social or psychological development of children and undermine a child’s right to childhood, development and education. The company recognizes its responsibility to take an effective role in reducing child labor.

## **Child Labor**

- The involvement of a person less than the age of [15], or the minimum age provided by the country’s laws, and who is less than the age for completion of compulsory schooling in any work.
- For light work, in the case of family farms, the involvement of a child of the farmer less than the age of [13], or the minimum age as defined by the country’s laws.
- For hazardous work, the involvement of a person less than the age of 18.

## **Hazardous Work**

- Any work which is likely to jeopardize children’s physical, mental or moral health, safety or morals should not be done by anyone under the age of 18 or (16 under strict conditions)

## **Light Work**

- Work that does not threaten their health and safety or hinder their education or vocational orientation and training.

## **Young Children**

When it comes to young children (younger than [14]), we don’t want to stand in the way of their health, schooling, or free time. That’s why we don’t and won’t employ anyone younger than [15] and require our subsidiaries to do the same.

We’re also committed not to do business with any organization that employs children younger than [15]. We’ll include this condition in every contract we sign and reserve the right to break the contract without penalty if our stakeholder violates this condition and refuses to agree on or follow through with an elimination plan.

## **Legal Exceptions**

### **Education and Vocational Work for Children**

We will promote education for children of school age in accordance with the education policy of free compulsory basic education of G.E.S.

We will accept work of older children that forms part of vocational training framework if:

- Work is carried out as required by the relevant authority (for example, a government department) and after consultation with the employers and workers concerned.
- It is a fundamental part of an approved education or training course or one designed to help in career choice or training.

## **Parental Employment**

We might occasionally do business with family-owned businesses. Those businesses are usually allowed to employ the owner’s young children if the work isn’t too hazardous. We accept this regulation, but we’ll still dissolve our contract if it comes to our attention that these children are exposed to danger or are working consistently during school hours.

## **Occasional Work**

Sometimes, parents give children tasks to complete to teach them skills and introduce them to a work environment. This is an acceptable practice, if it doesn't deprive children of school on a consistent basis or puts them in any danger.

## **Older Children**

When it comes to employing children who are older than [15], we will follow the local and international laws. Generally, older children can have a job involving light work.

Working hours and wages will be determined based on applicable laws. Children will not be employed for more than the maximum weekly or daily hours allowed by law.

These are mandatory conditions when forming partnerships or other business relationships. We will refuse to do business with anyone who employs children of any age in hazardous work or doesn't follow applicable laws on working hours or pay. We also expect them to communicate and enforce this Policy to their own contractors.

## **Actions and Implementation**

To make sure we enforce this policy and help eliminate child labor, we are committed to:

- Working with governments and other organizations to end child labor.
- Keeping and validating documentation verifying our employees' age after they're hired.
- Communicating our no child labor policy to organizations we're connected with and ensuring our contracts have the right stipulations.
- Using strict supervision to ensure that subcontractors or employers do not employ the services of under-aged children.
- Reporting and following-up by the Human Resource Department to keep both management and workers in compliance with this Policy.
- Complying with national law on child labor and minimum age.
- Complying with the Convention on the Rights of the Child. Not using or supporting the use of child labor as defined in ILO Convention 138.
- Prohibiting and seeking to eliminate the worst forms of child labor in accordance with ILO Convention 182.
- Not working with those who use child labor – unless an elimination plan is in place.

- Basing decisions about child labor on expert advice about the options available to children in the local context, and the best interests of the children affected.
- Educating employees and all staff on child labor and its negative impacts on the work environment and on society.

## **Purpose and Scope**

Artera is committed to supporting recognized human rights activities and initiatives. Respect for human rights is a core value of our business. We believe that long-term business success can only be achieved if human rights are acknowledged and protected. Our Human Rights Policy Statement sets out the fundamental principles embedded in our business operations and culture to ensure we do not engage in activities that directly or indirectly violate human rights. It is our corporate responsibility to uphold these principles throughout our entire organization. Additionally, we expect all stakeholders, including business partners, vendors, and suppliers, to be aligned in upholding human rights globally.

Our approach to human rights is based on:

- The United Nations Guiding Principles on Business and Human Rights
- The United Nations Universal Declaration of Human Rights
- The International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work

## **Policy Statement**

Artera's Policy Statement demonstrates our commitment to supporting and promoting human rights that benefit all our stakeholders, including our customers, employees, shareholders, investors, and the communities in which we live and operate. Our commitment is guided by the following seven principles:

## **Ethical Business Conduct**

As detailed in our Code of Conduct, we're committed to the highest standards of business ethics which govern the conduct of our business operations for all employees. We require all business on behalf of Artera to be conducted with honesty and integrity in full compliance with all applicable laws and regulations.

## **Employee Rights and Fair Labor Practices**

We believe all our employees deserve to be treated with integrity and respect. Therefore, we promote a work environment of transparency and trust. We compensate our employees competitively and operate in compliance with applicable wage, work hours, overtime and benefits laws and international labor standards.

## **Diversity and Inclusion**

We support and encourage diversity and inclusion within our business and the organizations with which we do business by maintaining workplaces that are free from discrimination or harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law. We are committed to providing equal opportunities for all employees, eliminating all discriminatory practices, and promoting a work environment that is free from harassment, violence and intimidation. For more information on Artera's diversity initiatives, please review our Diversity and Inclusion Policy.

## **Safe and Healthy Workplace**

Our policy is to provide and maintain a safe, healthy, and productive workplace for all our employees that complies with all applicable laws, regulations, and internal policies. For more information, see Artera's Health and Safety Policy.

## **Forced Labor and Human Trafficking**

We're committed to preventing and prohibiting forced labor of any kind, including all forms of modern-day slavery or human trafficking.

## **Child Labor**

We do not engage in or condone the unlawful employment or exploitation of children. For more information, see Artera's Anti-Child Labor Policy.

## **Freedom of Association and Collective Bargaining**

We respect the principles of freedom of association and collective bargaining. We are aligned with the International Labor Organization and its core conventions: No. 87, the Freedom of Association and Protection of the Right to Organize Convention, and No. 98, the Right to Organize and Collective Bargaining Convention.