

Impact CNC LLC - Supplier Code of Conduct & Sustainability Requirements

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Approved by: Aaron Schoon, VP of Engineering, Impact CNC LLC

1. Purpose

Impact CNC LLC ("Impact CNC," "we," "our") is committed to conducting business responsibly and to working with suppliers who share that commitment. This Supplier Code of Conduct & Sustainability Requirements ("Code") sets out the minimum social, environmental, ethical, and governance standards we expect of every organization that supplies goods or services to Impact CNC. These requirements are consistent with applicable laws and with internationally recognized standards, including the UN Guiding Principles on Business and Human Rights, the core Conventions of the International Labour Organization (ILO), the OECD Guidelines for Multinational Enterprises, and the Paris Agreement.

2. Scope

This Code applies to all suppliers, vendors, contractors, subcontractors, and service providers, and to their employees and representatives ("Suppliers"). It applies at all Supplier locations that provide goods or services to Impact CNC. Suppliers are expected to meet these requirements as a condition of doing business with Impact CNC.

3. Compliance with Laws and Standards

Suppliers shall comply with all applicable laws, regulations, and customer requirements in every jurisdiction in which they operate. Where this Code and applicable law differ, Suppliers shall apply the higher standard.

4. Human Rights and Working Conditions

Suppliers shall respect the human rights of workers and treat them with dignity and respect. At a minimum, Suppliers shall uphold the following:

- **Child labor and young workers** - No use of child labor. Suppliers shall comply with minimum-age laws and protect young workers from hazardous work.
- **Wages and benefits** - Pay at least the legal minimum wage (or prevailing industry wage, whichever is higher), provide legally mandated benefits, and pay on time.
- **Working hours** - Comply with applicable laws on working hours, overtime, and rest periods.
- **Modern slavery** - Prohibit all forms of slavery, servitude, forced or compulsory labor, and human trafficking.
- **Ethical recruiting** - Recruit ethically; workers shall not pay recruitment fees, and shall retain control of their identity documents.
- **Freedom of association and collective bargaining** - Respect workers' rights to associate freely and bargain collectively in accordance with local law.
- **Non-discrimination and harassment** - Provide a workplace free from discrimination and from physical, verbal, sexual, or psychological harassment or abuse.
- **Women's rights** - Promote equal treatment and protect the rights of women in the workplace.

- **Diversity, equity, and inclusion** - Foster a diverse, equitable, and inclusive work environment.
- **Rights of minorities and Indigenous peoples** - Respect the rights of minority and Indigenous communities affected by operations.
- **Land, forest, and water rights and forced eviction** - Respect legitimate land, forest, and water rights and avoid forced eviction.
- **Use of private or public security forces** - Ensure that any security arrangements respect human rights and do not subject workers or communities to abuse.

5. Health and Safety

Suppliers shall provide a safe and healthy working environment that complies with applicable law and recognized standards, including controls for personal protective equipment, machine safety, emergency preparedness, incident and accident management, workplace ergonomics, the handling of chemical and biological substances, and fire protection. Suppliers shall provide appropriate health and safety training to workers.

6. Business Ethics

Suppliers shall conduct business ethically and with integrity, including:

- **Anti-corruption and anti-money laundering** - Prohibit bribery, corruption, extortion, embezzlement, and money laundering in all forms.
- **Data protection and data security** - Protect personal and confidential information and maintain appropriate information-security controls.
- **Financial responsibility (accurate records)** - Maintain accurate and complete business and financial records.
- **Disclosure of information** - Disclose information truthfully and in accordance with applicable law and contractual obligations.
- **Fair competition and anti-trust** - Compete fairly and comply with competition and anti-trust laws.
- **Conflicts of interest** - Avoid and disclose conflicts of interest in dealings with Impact CNC.
- **Counterfeit parts** - Implement controls to prevent the introduction of counterfeit parts or materials.
- **Intellectual property** - Respect intellectual property rights and protect confidential information.
- **Export controls and economic sanctions** - Comply with applicable export-control and sanctions laws.
- **Whistleblowing and protection against retaliation** - Provide a means for workers to raise concerns confidentially and without fear of retaliation.

7. Environment

Suppliers shall operate in an environmentally responsible manner, comply with applicable environmental laws and permits, and work toward continuous improvement, including in the following areas:

- Greenhouse gas (GHG) emissions, energy efficiency, renewable energy, and decarbonization
- Water quality, consumption, and management
- Air quality and responsible chemical management
- Sustainable resource management, waste reduction, reuse, and recycling
- Animal welfare; biodiversity, land use, and deforestation; soil quality; and noise emissions

8. Responsible Sourcing of Raw Materials

Suppliers shall exercise due diligence over the sources and chain of custody of raw materials used in products supplied to Impact CNC. Suppliers shall, upon request, identify the smelters and refiners in their supply chain and complete and provide a current Conflict Minerals Reporting Template (CMRT) and any other reasonable due-diligence information for conflict minerals (tin, tantalum, tungsten, and gold) and other materials of concern.

9. Cascade Requirement (Sub-tier Suppliers)

Suppliers shall define and implement standards equivalent to this Code toward their own direct (tier-1) suppliers, and shall pass these requirements along their supply chain so that the standards are applied at each tier. This is a binding requirement of doing business with Impact CNC.

10. Monitoring, Verification, and Continuous Improvement

To confirm conformance with this Code, Impact CNC may:

- Require Suppliers to complete a self-assessment questionnaire (SAQ);
- Conduct or commission audits or assessments of Supplier sites and records; and
- Require Suppliers to implement corrective and preventive actions within agreed timeframes.

Impact CNC may reduce business with, or discontinue, Suppliers that are unwilling or unable to meet these requirements.

11. Raising Concerns

Workers, Suppliers, and other stakeholders may report suspected violations of this Code to Impact CNC at himpact@impactcnc.net. Reports may be made confidentially. Impact CNC prohibits retaliation against anyone who raises a concern in good faith.

12. Acknowledgment and Acceptance

By accepting purchase orders or contracts from Impact CNC, the Supplier acknowledges that it has read, understood, and will comply with this Supplier Code of Conduct & Sustainability Requirements.

Supplier name: _____

Authorized signatory: _____ **Title:** _____

Date: _____

Approved for Impact CNC LLC

Aaron Schoon

Aaron Schoon
VP of Engineering
Impact CNC LLC

Date: June 10, 2026

Signed electronically by Aaron Schoon on June 10, 2026.