



Aesbus Company

Supply Chain—Responsible Sourcing

Supplier Code of Conduct

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Supplier Code of Conduct

Aesbus (the "Company") has an excellent reputation for conducting business in an ethical and responsible manner. We have worked hard to develop this reputation and are committed to maintaining it by conducting our business activities honestly and in full compliance with the regulations, laws, and ethical business practices applicable to each location where we do business.

The Aesbus **Supplier Code of Conduct** outlines business conduct expectations for our vendors, partners, contractors, subcontractors ("Suppliers") and provides guidelines with respect to responsible sourcing including our commitments to human rights, the environment, health and safety, business ethics, data Privacy and data security, and the development of a diverse and sustainable supply chain.

1 PURPOSE OF THE SUPPLIER CODE OF CONDUCT

All Suppliers and business partners must comply with the Aesbus **Supplier Code of Conduct**. We refer to “Suppliers” as any third-party that provides goods or services to Aesbus for compensation.

Subcontractors of Suppliers are also expected to comply with our Supplier Code of Conduct.

All Suppliers and business partners must communicate these expectations throughout their supply chain. They must comply with applicable national, state and local laws/regulations in the markets where they operate. However, where local laws or standards differ from this Supplier Code of Conduct, we expect our Suppliers to comply with the more stringent standards and principles.

In the spirit of continuous improvement, Aesbus is committed to working with and supporting our Suppliers to meet and exceed the requirements in this Supplier Code of Conduct.

2 SUSTAINABLE PROCUREMENT AT AESBUS

The principles of **Sustainable Procurement** are integral to our business strategy:

- Value creation
- Sustainable environmental performance
- Corporate social responsibility

At Aesbus we are committed to our 6 core values: **Integrity, Responsibility, Teamwork, Simplicity, Sustainability, and Ingenuity**. These values are not only appropriate but create a strong foundation to underline our approach to Sustainable Procurement.

Aesbus’ approach to Sustainable Procurement with our Suppliers includes:

- Integration of our core values into our procurement strategy.
- Our day-to-day business operations.
- Our business relationship and interaction with Suppliers.

Aesbus is committed to risk management best-practices pertaining to **Personally Identifiable Information (PII)** security, social responsibility, and environment in our supply chain and we expect the same from our Suppliers.

3 AESBUS COMMITMENT TO SUPPLIERS

Aesbus seeks to engage in relationships with Suppliers that abide by **Personally Identifiable Information (PII)** legislation, are socially responsible, and behave with integrity. Our goal is to partner with Suppliers to deliver value-for-cost procurement for Aesbus and our clients.

Aesbus has established methodologies to implement strategic procurement strategies and to guide relationships with Suppliers. These guidelines ensure a fair, competitive, and transparent negotiation process, according to our policies and values.

We act with integrity and demonstrate good citizenship in our business dealings — we demand the highest standards of conduct from our own employees.

4 AESBUS EXPECTATIONS OF SUPPLIERS

Aesbus expects our Suppliers to meet high security, social, environmental, and Health and Safety standards. Suppliers must adhere to the following standards.

Our Suppliers are selected and evaluated beyond the basis of economic criteria. We also look closely at environmental protection, compliance with human rights, labor and social standards, as well as anti-discrimination and anti-corruption policies.

Aesbus has committed to the principles of “**We source responsibly**” and wants to partner with Suppliers to further develop our sustainability performance in our supply chain.

We expect our Suppliers to fully comply with applicable laws and to adhere to internationally recognized environmental, social and corporate governance standards. We also expect our Suppliers to use their best efforts to implement these standards with their Subcontractors.

4.1 BUSINESS INTEGRITY STANDARDS

We expect our Suppliers to comply with applicable laws, regulations, and industry standards.

4.1.1 Laws, Regulations, and Trade Control

Our Suppliers must comply with trade sanctions and similar restrictions issued by recognized authorities, including the United Nations, the European Union, and the United States.

IMPORTANT

Aesbus prohibits any Supplier service arrangement or provision that involves work performed from an international geo-location that is considered an **embargoed country** (such as **Cuba, Iran, Russia, China, Syria**, etc.).

4.1.2 Competition and Anti-Trust Laws

Suppliers must comply with competition and anti-trust laws in the countries where they operate or sell product. Suppliers must *not* coordinate market conduct with competitors or their own Suppliers in a way that improperly restricts competition.

4.1.3 Bribery and Corruption

Suppliers shall comply with all applicable anti-corruption laws and regulations and, to this effect have a zero-tolerance policy towards any form of bribery, corruption, extortion, and embezzlement. Suppliers shall not pay bribes or make any other inducement (including kickbacks, facilitating payments, excessive gifts and hospitality, grants or donations) in relation to their business dealings with customers and public officials.

Suppliers are expected to perform all business dealings transparently and these dealings shall be accurately reflected in their business books and records.

As a minimum, we expect our Suppliers to:

- Never offer or accept anything of value where there is an intention of improperly influencing a business decision, or where the person may not be permitted by their employer or local law to receive it.
- Disclose to Aesbus where they or their associates may have connections with government officials and never bribe government officials of any kind.
- Report immediately concerns regarding bribery or corruption to Aesbus management.
- Where applicable, comply with the Foreign Corrupt Practices Act, the UK Bribery Act, and locally applicable laws and regulations.

4.1.4 Conflicts of Interest

Our Suppliers should *not* cause any conflicts of interest for Aesbus employees, and should avoid situations where a conflict of interest may occur. We expect Suppliers to disclose in full any potential conflicts of interest they may have as soon as they have been identified, so that they can be properly considered, and the right action taken.

4.1.5 Gifts and Entertainment

We expect our Suppliers to respect that Aesbus employees must *not* provide or accept excessive or inappropriate entertainment and may only offer or accept non-cash gifts of modest value occasionally. Gifts and entertainment should never create a feeling of obligation or the impression of an obligation because this could be perceived as a bribe. We expect Suppliers to ensure they have appropriate controls in place so that gifts, sponsorship, or entertainment are not bribes or perceived as such especially if the recipient is a government official.

4.2 DATA SECURITY STANDARDS

We expect Suppliers to keep accurate and up-to-date records of matters related to their business with Aesbus, and to demonstrate compliance with applicable laws and regulations.

4.2.1 Business Records and Confidential Information

We expect our Suppliers to ensure appropriate technical and organizational security measures to safeguard Aesbus', as well as its clients and employees, confidential and sensitive PII data, and to meet the requirements of applicable data Privacy laws and regulations to ensure there is no disclosure of our confidential information to third-parties without our prior knowledge and/or consent.

4.2.2 Cybersecurity and Privacy Risk

We expect our Suppliers to assess and track cybersecurity and data Privacy risk associated with its Subcontractors or Service Providers with access to Aesbus' data assets and to take reasonable actions to promptly remediate these risks. Suppliers shall contractually obligate its Subcontractors or Service Providers to protect Aesbus' data, when accessed, processed, or stored by a Subcontractor or Service Provider, to the same level required of Suppliers under this Policy.

4.2.3 Network Security

Suppliers shall subject all network traffic to electronic review and monitoring. Suppliers shall use Intrusion Detection Systems (IDS)/Intrusion Prevention Systems (IPS) systems that generate alerts containing sufficient information to detect and evaluate a potential incident.

Suppliers shall segregate its connected networks and electronic systems to ensure systems and applications are protected from outside threats. This shall include utilizing industry standard firewalls to segment and protect the organization's internal network from the Internet, and also to segregate systems that access, use, or store Aesbus' data from other less restricted internal networks and systems.

4.2.4 Anti-Malware

Suppliers shall use anti-malware software on networks, servers, workstations and portable devices that may be used to access , use, or store, Aesbus data. Anti-malware software shall be regularly updated.

4.2.5 Data Breach

We also expect our Suppliers to inform Aesbus immediately in the event of a potential or actual data-security breach, or if our information is released to any third-party without authorization.

4.2.6 Offshoring

Suppliers are responsible for understanding and complying with the applicable cybersecurity and data Privacy laws and regulations of the foreign jurisdictions when conducting business within them. As part of any offshoring service request, Suppliers shall inform Aesbus of any applicable foreign laws or regulations that may impact the confidentiality, availability or integrity of Aesbus' data assets.

4.3 HUMAN RIGHTS AND LABOR STANDARDS

Aesbus wants to make a positive contribution to human rights and society. We are committed to promoting and respecting human rights throughout our supply chain and expect the same from our Suppliers.

We expect our Suppliers to act in accordance with these principles and commitments, and we have minimum standards in the following areas.

4.3.1 Child labor

Aesbus will *not* accept the use of child labor in our operations under any circumstances and will not purchase product(s) from any Supplier that uses child labor. Suppliers shall *not* use child labor. For example, individuals under the age of 15 or below the local legal minimum working age or mandatory schooling age, whichever is the higher.

Although Aesbus strictly prohibits the use of child labor, we support the development of legitimate workplace apprenticeship programs for the educational benefit of younger people (high school, community college, trade school, university programs).

4.3.2 Forced Labor

Suppliers shall *not* use work that is performed involuntarily under the threat of penalty, dismissal, or denunciation to authorities or as a disciplinary measure or for failure to meet production quotas.

Aesbus will *not* support trafficking in human beings or accept the use of forced, compulsory, bonded, indentured or prison labor in its operations under any circumstances and will not purchase product(s) from any Contract Manufacturer or utilize any supply chain partner that supports trafficking in human beings or utilizes forced, compulsory, bonded, indentured or prison labor.

Suppliers must ensure that every employee is a voluntary worker with the freedom to leave the workplace outside of work hours and terminate employment at any time without penalty after notice of reasonable length. Forced prison labor, or work against the will of an employee, including work required as a means of political coercion or punishment for expression of political views is strictly forbidden.

No employee shall be subject to any form of harsh or inhumane treatment, corporal punishment, threats of physical or sexual violence, or other forms of psychological or physical harassment, intimidation, abuse, coercion or sanctions that result in wage deductions, reductions in benefits or compulsory labor.

No part of an employee's salary, benefits, property, or documents shall be withheld in order to force such personnel to continue working.

4.3.3 Freedom of Association and Collective Bargaining

Suppliers shall *not* interfere with employees' freedom of association and collective bargaining that are in accordance with applicable laws and regulations. Non-discrimination Employment-related decisions shall be based on relevant and objective criteria.

Suppliers shall make no distinctions on grounds including, but not limited to: age, race, religion, color, ethnicity, national origin, disability, sexual orientation, gender, gender identity, gender expression or marital status and any other characteristic of which legal protection is afforded by local law.

Employment related decisions include, but are not limited to: hiring, promotion, lay-off and relocation of workers, training and skills development, health and safety, any policy related to working conditions like working hours and remuneration.

4.3.4 Abuse and Harassment of Labor

Suppliers must strictly prohibit any kind of harassment, intimidation, bullying or abuse of any employee, including through the threat of physical punishment or disciplinary action, or physically, sexually, racially, psychologically, or verbally.

4.3.5 Wages and Benefits

Suppliers shall ensure employees are paid a fair wage according to at least the legal minimum standards or appropriate industry standards, whichever is higher.

4.3.6 Working Hours

We expect our Suppliers to ensure employees do *not* work excessive hours, in accordance with national laws, collective agreements and the provisions of the relevant local standards on working time.

4.4 HEALTH AND SAFETY STANDARDS

Aesbus is committed to maintaining safe and secure working conditions for employees and contract workers. We expect our Suppliers to have the same approach. For our Suppliers, we have minimum standards in the following areas.

4.4.1 Laws and Regulations

Suppliers shall meet applicable local and national health and safety laws and regulations, including those related to the construction and maintenance of facilities for employees and contract workers.

4.4.2 Safe Working Environment

Suppliers shall maintain a safe, healthy, clean, and well-lit work environment including appropriate and adequate facilities and protection from hazardous materials or conditions. We expect our Suppliers to maintain the same standards in their factories and operations. If housing is provided for employees, all housing must be maintained in a clean, safe fashion.

Aesbus strictly forbids the use of cruel and unusual disciplinary practices in the workplace.

4.4.3 Risk Assessment

Suppliers shall conduct routine risk assessments, reflecting existing and emerging issues and good practice. These risk assessments are crucial to understanding health and safety issues both generally and specifically for their sector. Suppliers are expected to take appropriate action to mitigate identified risks.

4.5 ENVIRONMENTAL IMPACT

Aesbus is committed to promoting environmental management and initiatives in our business operations.

Aesbus periodically reviews Company business strategies and Supplier services to ensure adaptability and applicability to environmental management trends at local, state, and national levels. We seek to build a network of partnerships with public and private organizations to encourage greater community awareness of and involvement in environmental management initiatives.

We expect our Suppliers to support basic environmental considerations, such as.

- Where appropriate, incorporate environmental priorities, such as flexible remote work and recycling options as pollution prevention practices.
- Improve resource consumption efficiency and waste prevention in business operations and through the lifecycle of business operations hardware.
- Ensure the responsible use of energy and water throughout the organization.
- Develop a strong sense of environmental awareness to act in an environmentally responsible manner.

It is Aesbus' expectation that our Suppliers shall:

- Promote an environmental planning framework that addresses key environmental impacts from their operations and that also commits to continual improvement.
- Manage their environmental impact responsibly in line with applicable laws and regulations.

5 RAISING A CONCERN

Aesbus leadership provides oversight of business conduct expectations for our vendors, partners, contractors, subcontractors.

Aesbus believes knowing about potential data-security breaches early means we can deal with them quickly and appropriately.

We take every report seriously and we will not tolerate any reprisal by an Aesbus employee against a Supplier who has reported a concern in good faith or assisted us with an investigation.



We expect our Suppliers to raise any concerns about our business conduct, or a potential breach of this Supplier Code of Conduct, directly with their Aesbus contact.

If a Supplier prefers, a concern can also be raised directly with Aesbus management.

- Coni Fox, VP of Human Resources, coni.fox@aesbus.com *or*
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