SUPPLIER CODE OF CONDUCT

This Code of Business Conduct for Suppliers sets forth basic principles for supplier conduct when working with Epsilyte®. Epsilyte is committed to these principles and expects its suppliers to be as well.

HUMAN RIGHTS & LABOR: Respect for People is a core Epsilyte Value. We expect our suppliers to respect the human rights of their employees and treat them fairly, in accordance with all applicable laws.

Respect Freedom of Association and Collective Bargaining: Suppliers will respect employees' lawful right of free association, as well as their lawful right to join, form or not to join a labor union or otherwise engage in collective bargaining.

No Forced and Compulsory Labor: Suppliers will not use forced or involuntary labor, including prison labor, indentured labor, bonded labor, or slave labor.

No Harassment and Abuse of Labor: Suppliers will ensure that their employees are not subjected to psychological, verbal, sexual or physical harassment or any other form of abuse and will comply with all applicable laws on harassment and abuse of employees.

No Child Labor: Suppliers will comply with all applicable child labor laws.

No Discrimination: Suppliers will not discriminate in any condition of employment on the basis of race, color, national origin, sex, religion, age, disability, HIV/AIDS status, trade union membership, sexual orientation or any other personal characteristic unrelated to job performance and will comply with all applicable employment discrimination laws.

Supplier Diversity: Suppliers are encouraged to have an active Supplier Diversity Program and support the businesses and communities where Epsilyte operates by engaging with small businesses, minority- and woman-owned businesses and other diverse categories.

Appropriate Work Hours and Wages: Suppliers will comply with all applicable laws on work hours and overtime, as well as all applicable laws on wages and benefits.

Conflict Minerals Sourcing: Supplier will not source tin, tantalum, tungsten, or gold (the "Conflict Minerals") from the Democratic Republic of the Congo or the adjoining countries (the "Covered Countries") in a manner which directly or indirectly finances or benefits armed groups in the Covered Countries. Supplier will source Conflict Minerals from smelters that have been verified as compliant with the CFSP (Conflict-Free Smelter Program) assessment protocols of the CFSI (Conflict-Free Sourcing Initiative). Supplier commits to abide by all applicable laws and regulations related to Conflict Minerals and agrees to provide all necessary information requested by Epsilyte concerning products supplied by Supplier to enable Epsilyte to complete its reasonable country of origin inquiries and due diligence with respect to Conflict Minerals.

ENVIRONMENT, HEALTH & SAFETY: Epsilyte's commitment to sustainability includes efficient use of resources, respect for the environment and safe and healthy workplaces. Epsilyte is committed to Responsible Care® and expects its suppliers to make similar commitments to continuously improve their environmental, health and safety performance. Respect the Environment: Suppliers will comply with all applicable environmental laws. Suppliers will have systems in place to ensure safe management of waste, air emission and wastewater discharges. Epsilyte will favor suppliers who seek ways to minimize the use of nonrenewable resources, use all resources more efficiently and minimize the environmental impact of their operations.

Protect Health and Safety: Suppliers will comply with all applicable workplace health and safety laws. Suppliers will provide a safe and healthy workplace for their employees, including appropriate controls, training, work procedures and personal protective equipment.

Protect Communities during Transportation: Suppliers will comply with all applicable transportation laws. Suppliers will have systems in place to ensure safe and secure transportation of materials. This includes consideration for selection of logistics service providers (including warehouses and terminals), selection and inspection of transport containers, loading and unloading of transport containers, securing and sealing of transport containers, and responding to emergencies.

ETHICS & LEGAL REQUIREMENTS: Epsilyte expects its suppliers to conduct their business as Epsilyte strives to conduct its business: ethically and in compliance with the law.

Avoid Conflicts of Interest: Suppliers will avoid any interaction with a Epsilyte employee that may conflict, or appear to conflict, with that employee acting in the best interests of Epsilyte. This includes offering payments or employment opportunities to Epsilyte employees.

No Bribery: Suppliers will not engage in any form of commercial bribery or otherwise offer any incentive to any Epsilyte employee or Epsilyte employee's family or friends to obtain or retain Epsilyte business. Suppliers will comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and all other local or otherwise applicable laws dealing with the bribery of government officials.

Fair Competition: Suppliers will comply with all applicable laws regarding fair competition and antitrust.

Accurate Accounting and Business Records, Money Laundering, and Insider Trading: Suppliers will keep - and provide to Epsilyte upon request – accurate records of all matters related to the supplier's business with Epsilyte and shall not engage in any form of money laundering and shall never knowingly accept funds acquired through illicit means. No confidential information in the supplier's possession regarding Epsilyte shall be used to engage in or support insider trading.

Protect Information: Suppliers will protect Epsilyte's confidential information, including personal information, and act to prevent its misuse, theft, fraud, or improper disclosure and will comply with all applicable data privacy laws. Suppliers must take all due care in handling, discussing, or transmitting sensitive or confidential information that could affect Epsilyte, its employees, its customers, the business community or the general public.

International Trade: Suppliers will comply with all applicable laws governing international trade. Suppliers will provide Epsilyte with documentation necessary for Epsilyte to comply with import/export laws and will implement practices and procedures to ensure security of their supply chain under applicable regulations. If applicable, Suppliers will provide documentation to support the eligibility of their product under a Free Trade Agreement.

Sanctioned Parties: Shipper may not use any supplier of services or equipment which (a) is in any country subject to United Nations, U.S. or EU economic sanctions (or acting on behalf of persons or entities located in such countries) or (b) appears on lists of restricted or prohibited persons maintained by the United Nations, U.S., EU or the country of manufacture, origin/destination of the cargo. Shipper shall screen all vessels, containers and other equipment and their owners to ensure compliance with this requirement.

COMPLIANCE: In addition to the legal standards mentioned in this Code, suppliers will comply with all other applicable laws in the provision of products or services to Epsilyte. Epsilyte expects suppliers to implement systems and controls to promote compliance with applicable laws and the principles set forth in this Code, including policies, training, monitoring, and auditing mechanisms. Suppliers should also apply these or similar principles to the subcontractors and suppliers they work with in providing goods and services to Epsilyte.

ALL RIGHTS RESERVED: Epsilyte reserves the right to assess and monitor suppliers' compliance with this Code. Suppliers who are not in compliance with this Code may be terminated and/or precluded from consideration of future business. Suppliers must promptly implement corrective actions.

REPORTING MISCONDUCT: Suppliers who believe that a Epsilyte employee or anyone acting on behalf of Epsilyte has engaged in illegal or otherwise improper conduct with respect to their business with the supplier should report the matter to Epsilyte. Suppliers should also report any potential violation of this Code. Reports may be made through the Epsilyte ethics Line at EthicsPoint. A supplier's relationship with Epsilyte will not be affected by an honest report of potential misconduct.