



Supplier Code of Conduct

1. INTRODUCTION AND PURPOSE

East Penn was founded more than 75 years ago with a mission to deliver energy solutions through an innovative process of rebuilding used batteries with minimal waste. Today, we are proud to be the world's largest single-site lead battery manufacturer. Guided by circular economy principles, we design and produce more than 515 battery types for cars, boats, motorcycles, forklifts, and other vehicles. Our stationary backup systems provide reliable auxiliary battery power for businesses and communities, and we continue to expand our lithium-ion battery expertise and technology for industrial, military, and government applications.

Even as our company grows, we remain true to our original passion: **providing power to our customers responsibly, ethically, and sustainably**. We are committed to responsibly sourcing the commodities that advance this mission. Responsible sourcing means taking into account social, ethical, and environmental considerations throughout our supply chains and product lifecycle, as well as in the way we manage relationships with our suppliers.

To fulfill our mission, we rely on our network of valued suppliers to uphold our values, standards, and expectations. This Supplier Code of Conduct ("Code") outlines the minimum requirements we expect our suppliers to meet to demonstrate their commitment to ethical, safe, and responsible business practices.

2. BASIC SUPPLIER RESPONSIBILITIES

2.1 Compliance with this Code

This Code applies to all East Penn suppliers of materials, products, and services. Suppliers must also ensure that their workforce understands these standards and responsibilities when working with East Penn. In addition, suppliers must require their own suppliers, subcontractors, and other third parties that provide materials or services to East Penn to comply with this Code or equivalent principles. Suppliers may be held responsible for misconduct by any lower-tier supplier working for them on East Penn's behalf.

2.2 Compliance with the Law

Suppliers must operate in full compliance with all applicable laws and regulations, whether local, state, federal, or international. Custom or local practice must never take precedence over legal requirements. Where applicable laws conflict with the standards in this Code, suppliers are expected to follow the higher legal or ethical standard. Suppliers are also expected to uphold the highest standards of honesty, integrity, and fairness, and conduct their business in a socially responsible manner.

2.3 Reporting

Suppliers must promptly report any actual or potential violations of this Code or applicable law. East Penn also expects suppliers to report any conduct by our own employees that does not align with East Penn’s policies.

Reports may be made to your East Penn representative, to East Penn’s Legal Department at legal@dekabatteries.com, or anonymously by contacting our 24/7 helpline, run by an independent third-party:

Call or Text: 1-844-610-1336

Mobile QR Code:



Reports should include as much detail as possible to allow East Penn to investigate the matter appropriately. We will investigate all reports promptly, thoroughly, and in line with applicable law. Suppliers may be asked to participate in an investigation, and full cooperation is expected. Investigations and the identities of those involved will be kept confidential to the extent possible. East Penn will take appropriate action based on the findings.

2.4 Anti-Retaliation

Suppliers must not retaliate, or permit retaliation, against anyone who, in good faith, reports potential misconduct, raises a concern, seeks guidance, or cooperates in an investigation. “Good faith” does not mean you have absolute proof or that the conduct reported has to be substantiated; rather, it means you have a reasonable basis to believe your report may be true and requires further investigation. Suppliers must also foster a workplace environment where employees feel safe speaking up. A formal process should be in place to allow employees to report concerns without fear of retaliation. Where permitted by law, anonymous reporting should also be available.

2.5 Cooperation in Due Diligence, Audits, Investigations, and Reviews

East Penn reserves the right to conduct onboarding due diligence on any supplier before initiating a business relationship. We may also perform ongoing due diligence, monitoring, or audits at any time during the relationship to assess a supplier’s compliance with this Code and the agreement they enter in with East Penn. Suppliers must cooperate in good faith with any due diligence, audit, investigation, or review by East Penn.

Suppliers must also evaluate and monitor their own supply chain to ensure compliance with this Code or equivalent principles. Any non-compliance must be promptly disclosed to East Penn and addressed in a timely and effective manner, at no cost to East Penn.



In addition, to the extent permitted by law, suppliers must promptly forward to East Penn any subpoenas, regulatory requests, media inquiries, or other third-party communications concerning our company, our business relationship, or the materials suppliers provide.

East Penn will consider compliance with this Code when making sourcing decisions. Violations of this Code or applicable law may be deemed a breach of contract and result in immediate termination of the business relationship or other actions. East Penn also reserves the right to refuse to do business with non-compliant suppliers in the future and may pursue any other remedies available under contract or law.

3. PRINCIPLES

3.1 Human Rights and Working Conditions

Forced Labor, Child Labor, and Human Rights

East Penn is committed to upholding the highest standards of human rights and labor practices throughout our operations and supply chain. Under our Policy Against Human Trafficking & Slavery, we strictly prohibit the use of child labor, forced or compulsory labor, and any form of human trafficking. Our relationships with our employees are voluntary. Our employees are never required to lodge identification papers with the company, and we ensure that no employment fees, deposits, or other costs are borne by workers. We expressly prohibit any degrading treatment of individuals and any unsafe working conditions.

We expect suppliers to share these values and to hold their own suppliers and subcontractors to the same principles. Suppliers must:

- Ensure that all employment is voluntary and that no forced or compulsory labor is used in the supply of our materials.
- Neither engage in nor support human trafficking, exploitation, or the procurement of goods or services produced through such practices.
- Guarantee that workers have unrestricted access to their passports, work permits, and other identity or immigration documents at all times.
- Not charge recruitment fees or require deposits as a condition of employment.
- Ensure that child labor is not used in the supply of our materials. For the purposes of this Code, a “child” is defined as any person under the age of 15, or under the legal minimum age for employment in the country of operation, whichever is greater.
- Maintain effective age verification, recruitment, and monitoring systems to prevent forced labor and child labor.

Wages, Benefits, and Working Hours

East Penn is committed to providing fair and competitive compensation and benefits to employees. We ensure that wages and benefits comply with all applicable laws and regulations, and that working hours are humane, reasonable, and within legal limits. Our goal is to promote dignity, respect, and overall well-being in the workplace.



Suppliers must also comply with all applicable wage, benefit, and working hour laws and regulations in the jurisdictions where they operate. Suppliers must provide wages at least equal to the legal minimum and all required statutory benefits, including overtime pay where applicable, and refrain from using wage deductions as a disciplinary measure. Suppliers must ensure that working hours are reasonable, humane, and do not exceed the maximum allowed by law or industry standards.

Anti-Discrimination and Anti-Harassment

East Penn is firmly committed to complying with all applicable laws regarding discrimination, equal employment opportunity, and fair treatment. We do not tolerate discrimination on the basis of race, color, national or social origin, birth, religion, disability, gender, sexual orientation, marital status, age, or any other characteristic protected under applicable laws governing the communities in which we operate. We believe that an inclusive workforce strengthens our business and enhances our competitiveness, which is why we seek to attract, develop, and empower professionals of all backgrounds. We also do not tolerate harassment of any kind.

Suppliers must uphold the same commitments to respect, dignity, and fairness in their workplaces. All suppliers are expected to comply with applicable laws and regulations regarding equal employment opportunity and to maintain a work environment free from discrimination, harassment, and abuse on the basis of the same protected characteristics recognized by East Penn.

Rights of Minorities, Indigenous Peoples, and Women

We comply with the applicable provisions of Section 503 of the Rehabilitation Act of 1973, as amended, Title I of the Americans with Disabilities Act, as amended, 42 U.S.C. § 12111 et. seq., and the Vietnam Era Veteran's Readjustment Assistance Act of 1974, 38 U.S.C. § 2012(4212), and all related regulations. For operations outside the U.S., suppliers must comply with all comparable applicable laws and regulations.

Freedom of Association

East Penn is committed to fostering a workplace that promotes positive employee relations and respects the rights of workers to freely associate. We maintain policies and practices that encourage open and direct communication between employees and management at all levels of the organization, including procedures for reporting and addressing worker concerns without fear of retaliation.

We comply with all applicable laws governing the rights of workers to form, join, or organize unions of their choice, and refrain from any or all such activities.

Suppliers must respect and uphold these same principles and allow workers to freely associate and engage in collective bargaining in accordance with local laws and international standards (and likewise respect the rights of workers to refrain from these activities). Suppliers must also



maintain a process that enables workers to raise concerns about working conditions and other workplace issues openly and without fear of reprisal.

3.2 Health, Safety, and Quality

East Penn prioritizes the health, safety, and overall well-being of our employees. We provide a safe and healthy workplace environment and take effective steps to prevent potential accidents and workplace illness and injuries. We maintain a Health and Safety Performance Standards Policy that makes employees responsible for performing their job safely and for minimizing the risk of injury to themselves and fellow employees, contractors, and visitors. Our commitment extends beyond physical health—we strive to continually improve our occupational health and safety performance to include mental, emotional, and financial well-being.

We expect suppliers to provide a safe and healthy work environment for all workers in compliance with applicable laws, regulations, and recognized industry standards. Suppliers must assess workplace hazards and take proactive steps to minimize workplace accidents and health risk exposure. Suppliers must also maintain all required environmental, health, and safety permits, approvals, and registrations and comply with all reporting obligations.

Additionally, suppliers are required to meet all regulatory and quality requirements, as well as East Penn's internal quality standards, for all products and materials they provide.

3.3 Conflicts Minerals and Responsible Sourcing of Materials

East Penn is committed to responsible sourcing practices and to eliminating conflict minerals from our supply chain. Certain products we manufacture require tin for functionality or production.

To ensure ethical and lawful sourcing, we require all suppliers of tin and other applicable materials to provide assurances that their materials are sourced responsibly and do not originate from conflict-affected or high-risk areas. Suppliers must conduct due diligence in alignment with regulatory requirements and internationally recognized standards for the sourcing, extraction, and handling of such materials, and must maintain full visibility and traceability throughout their supply chains. If any supplier is unable or unwilling to provide such assurances, we will take appropriate action, which may include suspension of business or transitioning to alternative suppliers that meet these standards.

We also encourage suppliers and smelters, refiners, and other facilities in their supply chains to participate in and actively engage with recognized third-party audit programs (e.g., Lead Battery 360 or equivalent).

3.4 Environmental Responsibility

East Penn's Environmental Policy reinforces our commitment to designing, developing, and sourcing products and materials in ways that maximize resource efficiency and minimize environmental impact throughout the entire product lifecycle. Our approach includes reducing



waste, soil, air, and noise pollution, conserving energy and water, managing chemicals responsibly, and promoting the responsible use of raw materials.

We expect our suppliers to uphold these principles and conduct their operations in a manner that protects the environment, their workforce, and customers, and complies with all applicable environmental laws and regulations. Suppliers are expected to minimize greenhouse gas and other harmful emissions, reduce energy consumption and shift towards renewable energy sources, reduce waste, manage water use responsibly, avoid noise, air, soil, and water pollution, manage chemicals and hazardous substances safely and responsibly, and use raw materials in ways that minimizes their environmental impact, Suppliers must also obtain and maintain all required environmental permits, approvals, and registrations and comply with all associated reporting requirements.

East Penn encourages its suppliers to be mindful of the importance of biodiversity and healthy ecosystems to environmental sustainability and community well-being. Where practicable, suppliers are encouraged to consider opportunities to avoid or minimize potential adverse impacts to natural habitats and ecosystems, including through thoughtful land use decisions and sourcing practices that may help support habitat protection and reduce deforestation and land-conversion risks.

3.5 Business Ethics

Antitrust and Fair Competition

East Penn's Antitrust Policy requires the company to compete fairly and comply with all applicable antitrust and fair competition laws.

We expect the same from our suppliers. Suppliers must conduct business in a manner that promotes fair and open competition, and comply with all applicable antitrust laws and regulations. This includes avoiding anti-competitive practices such as price fixing or collusion, market or customer allocation, bid rigging or manipulation of tender processes, boycotts, and any agreements, understandings, or discussions that restrict competition at any level of the production or distribution chain. Suppliers must compete fairly and independently in every market in which they operate.

Conflicts of Interest

East Penn's employees are expected to act with integrity and avoid situations where personal interests could conflict with their duties to East Penn. Under East Penn's Conflicts of Interest Policy, employees must not allow personal, financial, or other interests to compromise—or appear to compromise—their ability to act objectively and in the best interests of the company.

We expect our suppliers to uphold this same standard. Suppliers must conduct business in a manner that avoids actual or perceived conflicts between their personal, financial, or other interests and their responsibilities as an East Penn supplier. Suppliers must promptly disclose to their East Penn representative any actual or potential conflicts of interest related to their business activities with East Penn.



Anti-Corruption and Bribery

East Penn conducts business in an honest, ethical, and transparent manner. Our Anti-Bribery & Corruption Policy strictly prohibits any form of corruption and bribery. This includes offering, paying, authorizing, soliciting, or receiving any payment or other thing of value—directly or indirectly, including through third parties—for the purpose of (i.e., in exchange for) causing a person to act or fail to act in violation of a legal or professional duty; causing the person to abuse or misuse their position; or securing any improper advantage, contract, or concession for our company or any other party.

Our suppliers must similarly maintain a zero-tolerance approach toward corruption, bribery, and any form of improper advantage. Suppliers must comply with all applicable anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), and implement reasonable controls to prevent bribery and corruption.

Financial Integrity and Disclosure

Suppliers must maintain accurate financial records, disclose relevant business information truthfully, and never falsify records or misrepresent facts.

Export Controls / Economic Sanctions

Suppliers must comply with all applicable export control laws, economic and trade sanctions, customs regulations, tariffs, and anti-boycott laws in connection with their work for East Penn. Suppliers are also expected to screen business partners and transactions to prevent violations of these requirements and to understand how such rules apply to their products, services, and activities across all relevant jurisdictions.

Anti-Money Laundering

Money laundering involves using legitimate businesses or transactions to conceal the origins of illicit proceeds. Suppliers must comply with all applicable anti-money laundering laws and take steps to ensure that their products, services, or operations are not used to facilitate unlawful activity. Suppliers are expected to maintain appropriate financial controls, conduct due diligence on high-risk transactions or business partners, and report any suspicious activity as required by law.

Confidentiality and Protection of Intellectual Property

Suppliers must respect and protect East Penn's confidential and proprietary information, including intellectual property, and must safeguard that information against misuse, mishandling, theft, fraud, or unauthorized disclosure. Confidential information may be used only for legitimate and authorized business purposes. This obligation applies at all times and includes compliance with applicable laws and the contractual terms agreed upon with East Penn.



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Data Privacy and Information Security

Suppliers must comply with all applicable data protection, privacy, and information security laws when handling information received from East Penn—both during and after their relationship with the company. Suppliers are expected to maintain robust administrative, technical, and physical safeguards in accordance with applicable data protection laws and East Penn’s standards to ensure the secure collection, processing, storage, transmission, and disposal of information.

Rev. April 2026