



Supplier Code of Conduct

Revision Date:

January 16th, 2025

SUPPLIER CODE OF CONDUCT

At Bearing Tech we have a strong commitment to conducting business not only in accordance with law but also in an ethical and honest manner. This commitment extends to our suppliers and their workers. We strive to ensure that our suppliers treat workers ethically, that supplier facilities minimize harmful community impacts, and that all of the stakeholders in our supply chain uphold these values. Upholding these values and complying with our supplier code of conduct is a condition of doing business with Bearing Tech.

This Supplier Code also applies to any subcontractors or subsuppliers. Suppliers are fully responsible for ensuring compliance by any such subcontractor or subsupplier. The Company reserves the right to audit suppliers' subcontractors/subsuppliers for compliance with the Supplier Code.

OUR VALUES

We expect our suppliers to act in accordance with Bearing Tech's core values of:

- Respect
- Integrity
- [Sustainability]
- Communication
- Excellence

RESPECT

Underage Labor – Suppliers shall not employ any underage labor and will comply with the legal minimum working age in the countries in which they operate and all age-related working restrictions as required by local laws. Suppliers must refrain from asking their employees or sub-suppliers to engage in illegitimate workplace practices, apprenticeships and internships that do not provide appropriate safety requirements or benefits to the employee, intern, or student apprentice.

Forced Labor and Human Trafficking – Suppliers shall not engage in or support the use of any form of involuntary labor including slavery, forced labor, bonded work, indenture, trafficked, or prison labor. All employees must have the right to engage in work willingly, without surrendering identification and without the payment of fees. Employees must be free to resign from their employment without violence or retaliation.

Conflict Minerals – To support our commitment to responsible sourcing, Suppliers must ensure that any tin, tantalum, tungsten or gold that is contained in the products we purchase is not sourced from the conflict region of the Democratic Republic of the Congo or any of its nine adjoining countries. This means Suppliers must: (a) identify whether any goods provided to Company contain tantalum, tin, tungsten or gold; (b) conduct a reasonable country of origin inquiry regarding the origin of such minerals in such goods to determine whether such minerals originated in the Democratic Republic of Congo or other covered countries, as defined in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act; (c) if such minerals originated in covered countries, conduct due diligence on the chain of custody of the source of such minerals for the purpose of identifying the smelter of said materials; and (d) conduct reasonable due diligence concerning the smelters of such minerals.

Freedom to Associate – Supplier shall not retaliate against or intimidate employees who engage in workplace organizing activities. Suppliers shall respect the freedom of their employees to associate.

Hours and Wages – Workers shall not work more than the regular and overtime hours allowed by local law, and all overtime shall be voluntary by the worker. Wages and benefits shall be paid on time and not unfairly withheld. Other than in extraordinary circumstances, total hours per week will not exceed 60 hours.

Non-Discrimination – Suppliers shall treat all employees fairly and shall not discriminate on the basis of gender, race, religion, age, disability, sexual orientation, pregnancy, marital status, nationality, political opinion, trade union affiliation, social or ethnic origin, or other status protected by local law.

Health and Safety – Suppliers shall ensure that they provide a safe workplace for their workers. Suppliers shall take steps to mitigate accidents and control health and hygiene hazards. Suppliers shall ensure that buildings comply with structural, fire, and safety codes as well as other local laws.

INTEGRITY

Accurate and Transparent Records – Suppliers must maintain accurate and transparent books and records in reasonable detail to verify compliance with this Supplier Code, other applicable policies and guidelines and contractual agreements with Bearing Tech. Suppliers must promptly supply those records for inspection upon Bearing Tech's request in the form requested by Bearing Tech. Suppliers must retain, dispose or destroy business records in compliance with applicable laws and requirements and in such a manner to protect confidential and proprietary information.

Conflicts of Interest – Suppliers must disclose to Bearing Tech all actual or potential conflicts of interest, whether business or personal related to Bearing Tech.

Anti-corruption – Bearing Tech is committed to obtaining business the right way. Suppliers shall not accept, solicit, offer or pay any improper payments in order to obtain a business advantage or special treatment. Suppliers shall report any potential instances of Bearing Tech representatives soliciting bribes or kick-backs to Bearing Tech management or through Bearing Tech's anonymous reporting channel.

Gifts & Hospitality - Suppliers must avoid activities that may create a conflict of interest or appearance of impropriety, such as, for example, offering, providing or reimbursing personal gifts, favors, personal travel expenses, excessive meals or entertainment, or any other thing of value to a Bearing Tech employee with the intent to influence business decisions. In addition, suppliers shall not provide excessive gifts and hospitality to third parties, including government officials.

Confidential Information – Bearing Tech trusts its vendors with confidential information, and we require vendors to safeguard our confidential and proprietary information plus require others in their supply chain to do the same. Bearing Tech's confidential or proprietary information may only be used in the manner authorized in writing by Bearing Tech pursuant to the vendor agreement and may only be disclosed to persons and entities (i) with a need to know such information for the performance of services authorized in writing by Bearing Tech and (ii) who are bound to maintain it in strict confidence. Suppliers must comply with their respective vendor agreement terms and conditions as well as applicable cyber security and privacy laws about retention requirements and must protect Bearing Tech's confidential and proprietary information in perpetuity even after the conclusion of their relationships

with Bearing Tech.

Counterfeiting – Suppliers must establish processes and programs to detect and prevent the use or creation of counterfeit goods.

Global Trade Compliance – Suppliers must comply with all applicable trade laws and regulations, including customs and import laws, export controls, country of origin, and economic and trade sanctions.

Security – Suppliers must ensure the integrity of their security practices and communicate such security protocols across their supply chains.

SUSTAINABILITY

[INSERT SECTION and ADD AS VALUE?]

COMMUNICATION

At Bearing Tech, we take the time to talk with one another and to listen. We believe that information is meant to move and that information moves people. We expect our suppliers to incorporate key communication principles.

Training – Suppliers shall maintain a robust training program that ensures that their employees know applicable legal and other requirements. The training program should also ensure that employees understand how to report concerns.

Whistleblower Protections – Suppliers must provide their employees with a reporting mechanism to safely and confidentially report workplace grievances or potential violations of law. Applicable laws may require an anonymous reporting mechanism and prohibit retaliation against employees who report workplace grievances in good faith.

Reporting – Suppliers shall notify Bearing Tech promptly of any violations of this Supplier Code or of contracts and agreements with Bearing Tech.

EXCELLENCE

At Bearing Tech we strive for the best in everything we do. We continue to raise the bar for our employees, partners, contractors, suppliers, vendors, and customers. We expect the same of our suppliers.

Quality – All items supplied to Bearing Tech shall adhere to quality standards that are provided by Bearing Tech as well as the applicable regulatory and industry requirements. Suppliers shall promptly notify Bearing Tech of any quality concerns.

Supplier Code Implementation – Suppliers shall actively implement the requirements in this Supplier Code of Conduct. Bearing Tech should be able to readily verify that Supplier has implemented this Supplier Code through a review of Supplier's practices.

Responsibility and Leadership – Suppliers must designate personnel with the responsibility for ensuring compliance with the elements of this Supplier Code. While responsible personnel need to be one person, the people who are designated should be of sufficient authority and experience to implement these

requirements.