

## **SUPPLIER CODE OF CONDUCT**

Methode Electronics Inc. and our subsidiaries, collectively "Methode Electronics" or "Methode" are committed to high standards of legal and ethical business practices, and we expect the same of our suppliers and those who conduct business on behalf of Methode. To ensure that our suppliers conduct business with a high degree of integrity and in a responsible manner, each of Methode Electronics' supplier and their representatives, employees, agents, suppliers, and subcontractors, collectively each a "Supplier," are expected to, at a minimum adhere to the requirements within this *Supplier Code of Conduct*, the "Code". Suppliers are to conduct all necessary inquiries to confirm compliance with this Code and remediate any issues in a prompt and responsible manner. Our suppliers are an important part of Methode and we strive to develop and maintain positive working relationships with all of our suppliers, and as such we expect our suppliers to always be open and communicative with Methode Electronics about the subjects covered by this Code.

### **1. RESPONSIBLE BUSINESS PRACTICES**

#### **1.1 Compliance with Law**

Supplier shall comply with all applicable national, state, provincial and local laws, ordinances, rules, and regulations, including those relating to the manufacture, labeling, transportation, customs, import/export, licensing, approval or certification of goods or services, foreign trade, environmental matters, data protection and privacy, intellectual property, wages, hours and conditions of employment, subcontractor selection, anti-discrimination, occupational health/safety and motor vehicle safety.

#### **1.2 Fair Dealing**

Supplier must act in accordance with national and international competition laws and shall not take any unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other illegal trade practice. Supplier shall not engage in price fixing, bid rigging, allocation of markets or customers, or similar illegal anti-competitive activities. Respect the intellectual property rights of others and avoid conflicts of interest and/or disclose internally and to Methode all conflicts of interest that may influence business relationships and avoid the appearance thereof.

#### **1.3 Anti-Corruption/Anti-Bribery**

Supplier shall conduct business with integrity and will tolerate no form of and will not engage directly or indirectly in any form of corruption or bribery and do not grant, offer or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage. This includes renouncing from giving or accepting improper facilitation payments. Supplier shall maintain transparency and accuracy in all recordkeeping.

#### **1.4 Disclosure of Information**

Suppliers shall accurately disclose information regarding their labor, health and safety, environmental practices, business activities, structure, financial situation, and performance in accordance with applicable regulations. All of supplier business dealings will be transparently performed and accurately reflected on the supplier's business books and records. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

#### **1.5 Confidential Information, Data Privacy, and Company Assets**

Suppliers are to maintain the confidentiality of all proprietary and nonpublic information entrusted to it by or on behalf of Methode. Supplier shall protect our confidential information against misuse or unauthorized disclosure with at least the same degree of care it uses to protect its own confidential information, and in any event a reasonable degree of care. Supplier shall not use any of our confidential, proprietary or nonpublic information for its own benefit or to our detriment. Supplier is to respect everyone's privacy and ensure that personal data is processed confidentially and responsibly, effectively protected, and only used for legitimate purposes. Any Methode assets provided are to be used for legitimate purposes for Methode and should not be used for non-Methode business.

#### **1.6 Anti-Money Laundering, Terrorism Financing**

Supplier will not directly or indirectly facilitate money laundering or terrorism financing and will comply with all applicable sanctions and trade laws.

### **2. SOCIAL RESPONSIBILITIES**

Supplier must respect all internationally proclaimed human rights by avoiding causation of and complicity in any human rights violations. Heightened attention shall be paid to ensuring respect of human rights of rights holders or groups of rights holders which are specifically vulnerable, such as women, children, pregnant or nursing mothers, migrant workers or of (indigenous) communities. Suppliers must provide access to a protected mechanism for their employees to report possible violations of the principles of this Code of Conduct and ensure the protection of whistleblowers or complainants against retaliation.

## **2.1 Right to Freely Chosen Employment**

Suppliers and their employment agencies shall not use or contribute to slavery, forced prisoner, bonded, indentured, or any other form of forced or compulsory labor. Suppliers will also not engage, directly or indirectly, in suppression, exploitation, and human trafficking. Employees must be free to terminate their employment without penalty.

Suppliers shall not require workers to pay Suppliers' agents' or sub-agents' recruitment fees or other related fees for their employment. Suppliers will provide full reimbursement to job seekers and workers if they have been required to pay any such fees or related costs. If necessary for a Supplier to use a labor broker, the Supplier will only use brokers that employ ethical recruitment practices, comply with applicable laws, and do not withhold identity documents.

## **2.2 Prohibition on Child Labor**

Suppliers and their employment agencies shall not use child labor. Suppliers must have or implement an appropriate mechanism to verify that the age of workers and workers recruited comply with the ILO Minimum Age Convention (No. 138) and be able to provide substantiation of this verification promptly upon request. If child labor is discovered in its supply chain, suppliers will cease employment of the child(ren) and take reasonable measures to enroll the child(ren) in a remediation/education program. Suppliers shall not use workers under the age of 18 ("young workers") to perform work that is likely to jeopardize or harm their health, safety, or morals. If young workers are found to be involved in work that is likely to jeopardize or harm their health, safety, or morals suppliers will take reasonable measures to immediately remove the young workers from the situation and provide alternative work that is age appropriate.

## **2.3 Wages and Benefits**

Suppliers and their employment agencies shall pay wages and provide benefits and compensation to workers that comply with all applicable wage laws and regulations, including those relating to minimum wages, maximum working hours, overtime hours, medical leave, and legally mandated benefits, and in line with Article 7 of the International Covenant on Economic, Social and Cultural Rights. Suppliers shall refrain from making any deductions from wages as a disciplinary measure or imposing any financial burdens on workers related to recruitment costs unless these are in accordance with the local law. For each pay period, Suppliers will provide workers with a timely and understandable written wage statement that includes sufficient information to verify accurate compensation for work performed. Workers must be paid directly, in a timely fashion, and in recognized currency. Suppliers will keep records of worker hours and wage documentation in accordance with local law.

## **2.4 Right to Freedom of Movement**

Suppliers and their employment agencies shall not impose restrictions on entering or exiting company-provided facilities including, if applicable, workers' dormitories or living quarters, except when lawful and necessary for safety or security purposes. Suppliers will refrain from restricting workers' movement through the retention of bank payment cards or similar arrangements for accessing wages. Suppliers will also refrain from requiring workers to use company-provided accommodation. Suppliers and their employment agencies will not destroy, withhold, or conceal identity or immigration documents, such as government-issued identification, passports, or work permits.

## **2.5 Right to Freedom of Association**

Suppliers shall comply with and respect all applicable laws and ILO core conventions related to the rights of workers to form and join trade unions of their own choosing, to bargain collectively, to engage in peaceful assembly, as well as respect the right of workers to refrain from such activities. Supplier will neither disadvantage nor make preference of members of employee organizations or trade unions. Suppliers shall avoid any form of threats, intimidation, physical or legal attacks against stakeholders, including union members and union representatives, exercising their legal rights to freedom of expression, association, and peaceful assembly. The supplier shall not use security forces, whether public or private, to interfere with freedom of association.

## **2.6 Non-Discrimination and Respect for Employees**

Supplier must ensure the equal treatment of employees, regardless of skin color, race, nationality, ethnicity, social background, intellect, disabilities, gender, sexual identity and orientation, marital status, political or religious conviction, military service status, or age and promote equal opportunities amongst them. Supplier must refuse to tolerate any unacceptable treatment of individuals such as mental cruelty, sexual harassment or discrimination including gestures, language, and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

## **2.7 Occupational Health, Safety, & Security**

Suppliers shall at all times maintain safe and healthy work environments for their employees and representatives that are routinely monitored and evaluated for changes to the work environment (e.g. machinery, chemicals, physiological process demand). Violence and threatening behavior are not to be tolerated. Suppliers are expected to provide working environments that support accident prevention and minimize exposure to risks, as well as provide appropriate, well-maintained, personal protective equipment. Suppliers are expected to comply with all applicable safety and health laws and regulations in the countries in which they operate.

Suppliers shall have procedures and systems to prevent, investigate, identify the root cause, manage, track, and report occupational injury and illness, including provisions to encourage worker reporting, provide necessary medical treatment, and facilitate the return of workers to work. Suppliers must provide training to ensure all employees are educated in health and safety issues. Suppliers shall identify potential emergency situations and events and minimize their impact by implementing emergency plans and response procedures,

including emergency reporting, employee notification and evacuation procedures, worker training, and drills. In the event of use of private or public security forces ensure that human rights of employees and other rights holders are respected (no use of unlawful physical or mental violence).

### **3. ENVIRONMENTAL RESPONSIBILITY**

Suppliers will follow applicable local, national, and international environmental laws. Suppliers will obtain and keep current all required environmental permits, approvals, and registrations, and follow their operational and reporting requirements.

Methode expects the supplier to refrain from harmful changes to the soil, water and air pollution, harmful noise emissions, and excessive water consumption, prevent people from accessing safe drinking water, impair or inhibit access to sanitary facilities, or be harmful to health. Methode also requires that the supplier make continuous efforts to reduce or mitigate their environmental pollution and risks and improve environmental protection within their own sphere of influence on an ongoing basis. The use of resources (energy, water, raw materials and/or (primary) materials) and the environmental impacts (emissions, pollutants, waste) are to be consistently minimized.

#### **3.1 Decarbonization & GHG Emissions**

The supplier shall implement measures to reduce its direct and indirect CO<sup>2</sup> emissions (including in its upstream value chain). This includes, for example, the use of green electricity and the use of secondary materials or biomaterials. Suppliers shall continually strive to reduce greenhouse gas emissions and should track Scope 1, 2, and 3 greenhouse gas emissions. Upon request, suppliers will share Scope 1, 2, and 3 greenhouse gas emissions data with Methode, and/or publish that data through a mutually agreed upon third-party. Suppliers should establish time-bound emission reduction goals and strive to use science-based target methodology.

#### **3.2 Resource Conservation**

Methode expects its suppliers to minimize waste generation and to ensure responsible handling of resources such as water, energy, resources, and materials. Methode also expects suppliers to qualify their own n-tier supply chains with regard to the provision of secured secondary raw material sources, and to evaluate that secondary raw materials are used to the greatest extent possible.

Methode expects our suppliers to be proactive in promoting energy and water conservation, eliminating or reducing waste and hazardous air emissions, and recycling or reusing materials as appropriate. All packaging and shipping materials and methods shall be environmentally responsible.

As part of their resource conservation efforts, suppliers should effectively reuse and recycle water and prevent unpermitted discharges and mitigate the potential impacts of such discharges.

#### **3.3 Biodiversity/Land Rights**

Suppliers shall respect the communities in which they are based and serve. Suppliers shall respect the land rights of individuals, indigenous people, and local communities in accordance with local laws, the ILO Indigenous and Tribal Peoples Convention (No. 169), and the United Nations Declaration on the Rights of Indigenous People.

As part of their land right responsibilities, we expect our suppliers to protect natural ecosystems and key biodiversity areas and to not contribute to the changing, deforestation, or damage of natural woodland and other natural ecosystems in accordance with international biodiversity regulations, including the IUCN Resolutions and Recommendations on biodiversity.

#### **3.4 Hazardous Materials**

Supplier shall manage, handle, store and transport all hazardous chemicals and substances in a safe and legal manner. Suppliers will look for ways to reduce the use of hazardous materials and substances of concern within products and their manufacturing processes. Furthermore, all other laws and specifications concerning hazardous materials, chemicals, and substances that apply to the business location and/or the market in question (e.g. European Regulation (EC) No. 1907/2006 (REACH)) are to be complied with.

Upon request, the supplier shall provide Methode with information on the use of materials in production and operations that are subject to restrictions arising from national and international law, as well as providing written procedures on how these substances are handled.

### **4. RESPONSIBLE SOURCING:**

#### **4.1 Conflict Minerals**

Supplier shall take reasonable efforts to avoid in its products the use of raw materials which originate from Conflict-Affected and High-Risk Areas and contribute to human rights abuses, corruption, the financing of armed groups or similar negative effects. To support compliance, Supplier shall exercise due diligence on its supply chain and as appropriate, mitigate the use of conflict minerals. Supplier shall make available to Methode at regular intervals, upon request, the results of Supplier's supply chain evaluations, and shall have in place appropriate policies to monitor its supply chain and support Methode in meeting its obligations.

Suppliers shall implement a policy committing to the responsible sourcing of all minerals and materials in line with Methode's Conflict Minerals Policy and Human Trafficking and Forced Labor Policy, as amended. Suppliers shall disclose to Methode, as necessary, updated

smelter/refinery information for any conflict mineral used in the production of its parts, materials, components, and products. Suppliers shall also engage with sub-tier suppliers to conduct due diligence by providing reporting templates or other information upon request.

#### **4.2 Animal Welfare**

Methode expects relevant suppliers that process animal products to implement standards and best practice methods to comply with animal welfare along the entire supply chain. We also expect our suppliers to give preference to alternative methods that do not involve animal testing, except where required by law. In any case, the supplier shall follow the national and international rules regarding animal protection and animal testing (e.g., EU Directive 2010/63).

#### **4.3 Use of Original Parts**

The supplier shall have processes and systems in place to prevent delivery of non-conforming products to Methode, including assurances that counterfeit parts are not used.

### **5. IMPLEMENTING THIS CODE OF CONDUCT**

Suppliers shall align their business and procurement activities with the principles stated herein and address them appropriately using a risk-based approach in their own supply chain. We expect that the supplier has established or is implementing a due diligence process with appropriate measures to ensure that its suppliers and subcontractors, in turn, also comply with the principles set out in this Code.

#### **5.1 Grievance Mechanism and Non-Retaliation**

Suppliers are to alert Methode to any violations of this Supplier Code of Conduct. Methode has contracted with an independent third party that specializes in Help Line Reporting to manage the reporting via a toll-free number and web reporting tool. This Help Line has multi-lingual representatives, and is available 24 hours a day, seven days a week. The toll-free U.S. number is: 1-800-461-9330, the International collect call / reverse charges number is: 1-720-514-4400, and the secure web portal is: [www.convercent.com/report](http://www.convercent.com/report). All incident reports are directed to the Corporate Office for investigation and corrective action if needed. We encourage Suppliers to provide their name with any report, but reports can also be filed anonymously if desired. If a Supplier reports a concern or violation, it is encouraged to provide accurate and complete information to permit a thorough investigation or response.

#### **5.2 Addressing Impacts**

Suppliers are to be expected to audit and confirm their compliance with this Code and promptly remediate any noncompliance. We reserve the right to independently audit or investigate Supplier from time to time in appropriate circumstances to verify compliance, and Supplier shall cooperate in all reasonable respects with respect to any such audits or investigations. Further, upon reasonable request, Supplier shall certify to us whether it is in compliance with the terms and conditions of this Code, and if not, describe the actions it is taking to remediate any issues. We always reserve the right and in appropriate circumstances to terminate any Supplier that does not operate in a legal, ethical or responsible manner.

#### **5.3 Contact Information**

Send any questions or comments concerning this Supplier Code of Conduct to [coc@methode.com](mailto:coc@methode.com).