



# Supplier Code of Conduct

Adopted on July 14, 2023

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## Overview

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FreeWire Technologies, Inc. ("FreeWire") is committed to conducting business with the highest level of professionalism and integrity. We recognize that our business activities can have upstream and downstream impacts on our employees, communities, commercial partners, and the environment. Accordingly, we strive to set standards that align with internationally recognized principles and guidelines related to labor and human rights, health and safety, the environment, and ethical conduct.

This supplier code of conduct (this "Code") applies to suppliers and their subsidiaries and affiliates, as well as any subcontractors and any other entity that provides goods and services to FreeWire or for use in or with FreeWire's products (each, a "Supplier"). In addition to the responsibilities outlined in this Code, our Suppliers must comply with all applicable local, federal, and international laws, regulations, directives, and guidelines, as well as all obligations in any contract a Supplier may have with us. Each Supplier must communicate the requirements of this Code with its own employees, suppliers, and subcontractors.

We appreciate that we engage with a global supply base, and accordingly, there may be cultural differences among our Suppliers. However, this Code includes universal principles and is key to supporting our values, and we count on our business partners to embrace our values to support our mutual success. Our core values span the areas of ingenuity, resourcefulness, perseverance, and conviction. These values represent how we work together, what we expect of our customers and Suppliers, and what our customers, Suppliers, and the marketplace should expect of us.

## Labor and Human Rights

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Suppliers must promote the dignity, respect, and human rights of all workers, including direct employees, contractors, and temporary, migrant, student, contract, and all other types of workers. This includes the following commitments:

- **No Forced or Child Labor:** Suppliers shall not use child, forced, indentured, bonded, or involuntary prison labor. Further, Suppliers shall not engage, directly or indirectly, in slavery or human trafficking of any kind. Suppliers must provide all workers with a written work document describing terms of employment and providing any required disclosures in a language understood by the worker. Workers must be able to terminate their engagement with Suppliers at any time.
- **Hours, Wages, and Benefits:** Suppliers must comply with all applicable laws related to work hours, overtime, wages, and benefits. Suppliers shall provide workers with documentation related to wages, and shall pay any agency recruitment or employment fees and expenses.
- **No Abuse:** Suppliers shall comply with all applicable laws regarding abuse of employees. Suppliers will not engage in sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, verbal abuse, or any other harsh or inhumane treatment.
- **Community Engagement:** Suppliers should engage in socially responsible conduct by respecting the rights, cultures, and traditions of indigenous people in the regions where they operate. Suppliers shall also work with their local communities to implement projects and strategies that improve the community and benefit those who live there.
- **Non-Discrimination / Non-Harassment:** Suppliers must treat employees fairly and not discriminate, harass, or take other adverse actions on the basis of differences such as race, color, creed, religion, age, gender, national origin, citizenship, union membership, marital status, sexual orientation, gender identity, disability, pregnancy, veteran status, or any other legally



protected status. Suppliers shall promote a culture of equality, diversity, and inclusion.

- **Freedom of Association:** Suppliers shall comply with all applicable laws related to the rights of workers to form or participate in work-related organizations, as well as engage in collective bargaining and seek representation, without fear of discrimination, violence, or harassment of any kind.
- **Worker Grievances:** Suppliers must establish and maintain a grievance mechanism that is known to workers, enabling them to raise complaints or concerns without retaliation. Suppliers must also track and act upon any complaints while protecting worker anonymity.

## Health and Safety

Suppliers shall abide by all applicable laws, directives, and regulations and enact procedures to promote a safe and healthy work environment. Specifically, such efforts must focus on the following:

- **Occupational Safety and Health:** Suppliers shall implement procedures to prevent, manage, track, and report occupational injury, illness, and exposure to safety and health hazards. Suppliers must enact proper design, engineering, and administrative controls. Suppliers must also provide workers with appropriate personal protective equipment as well as information and ongoing training about potential safety and health hazards.
- **Emergency Preparedness:** Suppliers must develop and maintain emergency plans and protocols, including those related to emergency reporting, worker notification and evacuation, worker training and drills, exit routes, emergency equipment, and recovery plans.
- **Sanitation, Food, and Housing:** Suppliers are required to provide workers with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage, and eating facilities. If Suppliers provide workers with housing, any facilities must be clean and safe, with reasonable personal space, entry and exit privileges, emergency egresses, adequate heat and ventilation, and hot water for bathing and showering.
- **Physically Demanding Tasks:** Suppliers shall identify, evaluate, and control worker exposure to the hazards of physically demanding tasks, such as manual material handling, heavy or repetitive lifting, prolonged standing, and highly repetitive or demanding assembly tasks.

## The Environment

At FreeWire, we believe that making responsible decisions that further sustainability initiatives and advance environmental principles is an investment in building a successful and resilient company while developing a high quality product for our customers and investors. Supplier shall take the following steps to help us advance such initiatives and principles:

- **Environmental Permits and Reporting:** Suppliers must obtain and keep current all required environmental permits, approvals, and registrations and follow their operational and reporting requirements.
- **Resource Efficiency and Clean Energy:** Suppliers shall aim to reduce consumption of resources, including raw materials, energy, and water, throughout their operations, and shall work to reduce their impacts on biodiversity. Suppliers shall seek to minimize or eliminate emissions and discharges of pollutants. Suppliers must track, document, and seek to minimize energy consumption and greenhouse gas emissions, and look for ways to improve energy efficiency and use cleaner sources of energy.
- **Hazardous and Restricted Substances:** Suppliers must identify and manage chemicals and other materials that may be hazardous to the environment, and must also ensure their safe handling, use, storage, and disposal. Suppliers will assess ways to reduce the use of hazardous materials and substances within their products and manufacturing processes.
- **Materials:** Suppliers must follow all applicable laws, regulations, and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including those related to labeling for recycling and disposal.
- **Waste Management:** Suppliers shall strive to reduce or eliminate waste of all types. For waste that cannot be eliminated, Suppliers shall store, handle, transport, and dispose of waste in a way that protects the health and safety of workers and the environment.

## Ethical Conduct

Suppliers are required to conduct their business honestly, responsibly, and ethically in their dealings with workers, their commercial partners, and other third parties. Suppliers shall commit to the following: initiatives and principles:

- **Business Integrity:** Suppliers must comply with all



applicable anti-corruption laws and regulations, and shall refrain from engaging in extortion, embezzlement, bribery, kickbacks, anti-competitive behavior, and any other prohibited business practices. Suppliers shall operate transparently, which includes accurately recording and disclosing information regarding their business activities, structure, financials, and performance in accordance with applicable laws and regulations and prevailing industry practices.

- **Conflicts of Interest:** Suppliers, their employees, and their family members cannot receive improper benefits through their relationship with FreeWire, and shall not allow other activities to conflict with acting in FreeWire's best interests. Suppliers must avoid conduct that could create a conflict of interest and/or other impropriety, including giving gifts, meals, entertainment, fees, favors, loans, or other compensation or business courtesies to any FreeWire employee, contractors, or agents representing FreeWire in order to improve or gain any business transactions with FreeWire.
- **FreeWire Resources:** Suppliers shall only use FreeWire resources, including assets, intellectual property, and confidential information, for legitimate business purposes and shall safeguard such resources that may be used in the course of performing contracted work.
- **Intellectual Property:** Suppliers must respect and protect intellectual property rights when transferring technology and know-how.
- **Privacy and Information Security:** Suppliers must protect the privacy of personal information of all parties with whom they do business, including their commercial partners and workers.
- **Export Controls and Economic Sanctions:** Suppliers shall adhere to all applicable restrictions on the export, release, or other transfer of goods, services, and technology. Suppliers must also comply with all applicable economic sanctions restrictions involving applicable territories, entities, and individuals, and shall conduct appropriate due diligence on third parties.

communications and documentation practices, and improvement objectives.

FreeWire may, at our discretion, assess Suppliers' compliance with this Code, and any violations may jeopardize a Supplier's business relationship with FreeWire, up to and including termination. Suppliers should conduct regular internal audits to assess compliance with this Code, and to cooperate with any information requests from FreeWire regarding Code compliance. Suppliers should also promptly notify FreeWire if any such internal audits identify breaches of the Code. FreeWire may consider Suppliers' conformance with this Code when making future sourcing and procurement decisions. As permitted by law, Suppliers shall promptly inform FreeWire of any concern related to issues governed by this Code and collaborate with FreeWire in subsequent investigations.

## Management Systems and Assessment

Suppliers must establish internal management systems to comply with this Code. Such systems should include executive level commitment and accountability, stakeholder engagement, risk assessment and management, training,

