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# Avtron's Human Rights Policy

Avtron is committed to maintaining a corporate culture that respects the principles aimed at promoting, protecting and supporting all internationally recognized human rights. We recognize our responsibility to respect human rights and avoid complicity in human rights abuses.

## Purpose

Respect for human rights is a fundamental value of the Company. Avtron strives to respect and promote human rights in our relationships with our employees, customers, communities, and other business stakeholders.

## Our Employees

Avtron believes that employees should be treated with respect and dignity and work in an environment that is free from harassment and unlawful discrimination. The Company's commitment to respect human rights in the workplace is stated in our Employee Handbook, policies, standards and practices. These policies state, among other things, that we value and promote workforce diversity and do not tolerate unlawful discrimination or harassment. We maintain an ethical work environment that reflects the core values of our Company, and we provide a safe and secure workplace.

Our employees have access to Avtron's Ethics Point Hotline by contacting them at 1-833-970-9633 (US) or by accessing Avtron's online reporting portal at [avtronpowersolutions.ethicspoint.com](http://avtronpowersolutions.ethicspoint.com) and selecting "Make a Report".

Employees are strongly encouraged to raise ethics, discrimination, or harassment matters, and to report suspected violations of applicable laws, policies and/or our Employee Handbook. Retaliation for raising concerns in good faith is prohibited per our Internal Reporting and Non-Retaliation Policy per our Employee Handbook.

## Our Suppliers

Avtron strives to respect human rights through its supply chain by encouraging actions that are consistent with and further the objectives of our code of Business Conduct, and by using suppliers whose corporate values are consistent with ours. Specifically, the Company encourages suppliers to follow best practices in the areas of freely chosen employment; working hours; respect in the workplace; wages and benefits; and health and safety.

## Our Customers

Avtron seeks to do business with customers who share our values with respect to human rights. We strive to conduct appropriate due diligence and encourage our customers to maintain high ethical standards and practices. Through our customer relationships we have an ability to share best practices, which we believe will help further the respect of human rights around the world.

## Communities and Stakeholders

Avtron recognizes and accepts our responsibility to the communities we serve, through acting as a good neighbor and through involvement and support for community activities. We respect the rights of people in the communities in which we operate. The Company will seek to identify adverse human rights impacts and take appropriate steps to avoid, minimize and/or mitigate them. Avtron will strive to ensure that our communications with governments, regulatory bodies and public authorities are consistent with our human rights commitments, as stated herein.

## Corporate Citizenship

We recognize and accept our responsibility to the communities we serve, through acting as a good neighbor and through involvement and support for community activities.

## Workplace Security and Healthy Workplace

Avtron is fully committed to the health and safety of our work force and to the protection of our neighbors, the environment, and our assets. Avtron will exercise reasonable care in providing each employee a workplace free of recognized hazards, including violent acts or threats of violent acts against employees or third parties within Company workplaces. The Company will not tolerate violence or threats of violence and will take reasonable measures to provide a safe workplace. The Company will make reasonable efforts to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements.

## Diversity and Inclusion

Avtron values and advances diversity and inclusion in the workplace. The Company is committed to equal opportunity and is intolerant of discrimination and harassment. We work to maintain workplaces that are free from discrimination or harassment on the basis of race, sex, color, national origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, or any other status protected by applicable law. Qualifications, performance, skills and experience are the basis for recruitment, hiring, placement, development, training, compensation and advancement at the Company.

## Labor Relations

Avtron is dedicated to creating a workplace that respects and values all employees and maintains an environment of open and direct communication. The Company strives to develop mutually rewarding relationships with employees through fairness, trust and integrity. Due to the direct partnership with employees, the Company does not believe in the need for an outside group to speak on behalf of employees. However, the Company respects freedom of association without fear of reprisal, intimidation or harassment.

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## Anti-Corruption Policy

Avtron does not tolerate corruption of any kind. While impossible to list all forms of corrupt behavior, the following list are examples of infractions that will result in disciplinary action

- Bribery
- Inappropriate gifts
- Falsifying documents
- Double dealing
- Under-the-table transactions
- Embezzlement, theft and fraud
- Diverting funds
- Laundering money
- Defrauding investors

Avtron strictly prohibits its officers, employees, agents, or anyone acting on behalf of Avtron, from offering, paying, soliciting or receiving kickbacks, bribes, rebates or any other improper payments in any of its business operations. This prohibition applies to all business activities, whether involving government officials, commercial enterprises, or any other individual or entity. A kickback, bribe, rebate or other improper payment to secure a business advantage is strictly prohibited and can expose individuals and the Company to possible criminal prosecution, civil and administrative fines, reputational harm or other serious consequences. Each officer and employee of the Company has a personal responsibility and obligation to conduct the Company's business activities ethically and in compliance with all applicable laws.

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Improper payments prohibited by this policy include bribes, kickbacks, rebates, excessive gifts or entertainment, or any other payment (or anything of value) offered or received to obtain an undue business advantage. Under applicable law, Avtron and its individual officers or employees may be held liable for improper payments offered, paid or received by an agent or other intermediary on behalf of the Company if there is actual knowledge or reason to know that an improper payment will be offered, paid or accepted.

Customers or suppliers who engage the aforementioned actions or unfair business practices will be prohibited from doing business with Avtron.

## Environmental Policy

Avtron is committed to environmentally friendly practices that promote sustainability and responsible corporate stewardship. From materials sourcing to our manufacturing processes, we strive to minimize our impact on the environment and lead by example in working toward a brighter, greener and cleaner future for everyone.

### Our approach to sustainability

Our dedicated environmental health and safety employees work diligently to make sure all of our facilities meet both local and federal regulations for sustainability in the US and comply with all international standards in the United Kingdom and Mexico.

Avtron's waste management philosophy is simple: If we don't create any waste, it can't negatively impact the environment. That's why we aim to produce as little waste as possible through efficient manufacturing processes. Our lean manufacturing approach helps us eliminate re-work and waste. What waste we do create is often recycled back into our production process to limit the amount of

material going to landfill. We also have a robust recycling program to give new life to packaging and other materials that can't be reused in our products. In our offices, we are paper-less as much as possible.

We believe that by doing our part, we can create a better future for our employees, our customers, our children and the planet.

## Consequences/Penalty for Non-Compliance

Adherence to aforementioned policies is mandatory. Non-compliance may result in disciplinary action, up to and including termination. A violation, or suspected violation, of this policy or standard should be reported to your manager, your Vice President of Human Resources or Avtron Reporting Hotline.

## Reservation of Rights

The Company reserves the right to interpret, modify, terminate, or revise this policy or standard, in whole or in part, without notice. Statements within this policy or standard regarding conduct that may result in discipline do not limit, in any way, the Company's right to discipline employees for conduct not specifically described above. In addition, this policy or standard shall not be construed as an employment contract or to alter any employee's at-will status. Employees and the Company remain free to terminate the employment relationship at any time, with or without cause or notice. Similarly, the Company reserves the right to terminate an employee with or without the use of progressive discipline.