

New Eagle Supplier Code of Conduct

ISO 9001:2015 / IATF 16949:2016

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Purpose and Scope

New Eagle (the “Company”) is committed to conducting business ethically, responsibly, and in accordance with all applicable laws and international standards. This Supplier Code of Conduct (the “Code”) outlines our expectations for all suppliers, contractors, and business partners (“Suppliers”) regarding labor practices, human rights, and ethical conduct. All Suppliers are required to communicate these standards throughout their own supply chains and ensure compliance at all levels.

As a supplier to New Eagle, it is important that you read, understand and fully comply with our Code. The Code sets out basic principles expected by New Eagle for conduct to avoid even the appearance of improper behavior.

If a law conflicts with a policy in this Code, you must comply with the local law. If you have any questions about these conflicts, you should ask your supervisor or Human Resources on how to handle the situation. Regardless, you should always seek to act in accordance with the ethical standards described in this Code.

Social Responsibility and Environmental Stewardship

New Eagle, LLC prides itself on being a company that operates with integrity by doing the right thing in every aspect of our business, including being a socially responsible company. We seek to align our social and environmental efforts with our business goals while continuing to develop both qualitative and quantitative metrics to assess our progress.

We are committed to conducting business in an environmentally responsible manner and strive to improve our performance to benefit our employees, customers, communities, ownership and the environment. We use energy wisely and efficiently and employ technology to minimize environmental impact, including emissions reduction of greenhouse gases. Suppliers whose work affects environmental compliance must be familiar with the permits, laws and regulations and environmental policies that apply to their work. All suppliers are responsible for making sure that business is conducted in compliance with all applicable laws and in a way that is protective of the environment.

General Compliance Policies

Compliance with Laws, Rules and Regulations

Obeying the law, both in letter and in spirit, is the foundation on which the Company's ethical standards are built. All suppliers must respect and obey the laws of the cities, states and countries in which we operate.

Conflicts of Interest

A "conflict of interest" exists when a person's private interest interferes in any way with the interests of the Company.

Wages and Benefits

Suppliers must provide fair wages, benefits, and working conditions in compliance with applicable laws and industry standards. Compensation should meet or exceed the legal minimum wage and provide for the basic needs of employees and their families.

Working Hours

Working hours must comply with applicable laws and industry standards. Overtime must be voluntary, compensated fairly, and not excessive.

Modern Slavery

Suppliers must ensure that all forms of slavery, servitude, forced or compulsory labor, and human trafficking are strictly prohibited. Workers must be free to leave employment and not be coerced into work under threat or penalty.

Ethical Recruiting

Suppliers must engage in transparent and ethical recruitment practices. No recruitment fees should be charged to workers, and all employment terms should be clearly communicated before hiring.

Freedom of Association and Collective Bargaining

Suppliers must respect the rights of employees to freely associate, join labor unions, and engage in collective bargaining in accordance with local laws.

Non-Discrimination and Harassment

Suppliers must provide a workplace free from discrimination, harassment, or abuse. Employment decisions must be based on merit and not on race, gender, religion, age, disability, sexual orientation, or any other protected status.

Women's Rights

Suppliers must ensure equal treatment, opportunities, and compensation for women. Discrimination, harassment, or exploitation of women is strictly prohibited.

Diversity, Equity, and Inclusion

Suppliers must promote an inclusive workplace that values diversity and provides equitable opportunities for all employees, regardless of background or identity.

Rights of Minorities and Indigenous Peoples

Suppliers must respect the rights, traditions, and cultures of minorities and Indigenous Peoples, ensuring their free, prior, and informed consent in matters that affect their lands or resources.

Land, Forest and Water Rights and Forced Eviction

Suppliers must avoid participation in land grabbing or activities that result in forced evictions. Operations must respect local land, forest, and water rights and engage with communities transparently.

Use of Private or Public Security Forces

Suppliers must ensure that any security personnel engaged act ethically and lawfully, avoiding excessive force or abuse, and always respecting human rights.

Health and Safety

Suppliers must provide a safe and healthy working environment, identifying, evaluating, and mitigating risks related to physical, chemical, biological, and ergonomic hazards.

Anti-Corruption and Anti-Money Laundering

Suppliers must prohibit bribery, corruption, extortion, and embezzlement in any form. They must implement policies and controls to prevent money laundering.

Data Protection and Data Security

Suppliers must protect confidential information and personal data against unauthorized access, use, or disclosure in compliance with applicable data protection laws.

Financial Responsibility (Accurate Records)

All business dealings must be transparently performed and accurately recorded in accordance with applicable laws and industry standards.

Disclosure of Information

Suppliers must disclose information truthfully and not misrepresent facts in their operations, financial reporting, or communications.

Fair Competition and Anti-Trust

Suppliers must compete fairly and in compliance with antitrust and competition laws, avoiding collusion, price-fixing, or market manipulation.

Conflicts of Interest

Suppliers must avoid situations that create or appear to create conflicts of interest in their business relationships.

Counterfeit Parts

Suppliers must develop and maintain processes to prevent the use or supply of counterfeit or fraudulent parts and materials.

Intellectual Property

Suppliers must respect intellectual property rights and protect confidential and proprietary information shared during business dealings.

Export Controls and Economic Sanctions

Suppliers must comply with all applicable export control laws, trade restrictions, and economic sanctions regulations.

Whistleblowing and Protection Against Retaliation

Suppliers must provide mechanisms for employees to report concerns or unethical conduct without fear of retaliation.

GHG Emissions

Suppliers must monitor and reduce greenhouse gas emissions in alignment with international climate goals.

Energy Efficiency

Suppliers must seek to improve energy efficiency in their operations through technology, process optimization, and continuous improvement.

Renewable Energy

Suppliers are encouraged to increase the use of renewable energy sources in their operations.

Decarbonization

Suppliers should set targets and implement strategies to decarbonize their operations and supply chains.

Water Quality, Consumption and Management

Suppliers must manage water resources responsibly, minimizing consumption, preventing pollution, and protecting water quality.

Air Quality

Suppliers must monitor and minimize air emissions that contribute to pollution and health hazards.

Responsible Chemical Management

Suppliers must identify and manage chemicals to prevent harm to human health or the environment, and comply with all chemical regulations.

Sustainable Resources Management

Suppliers must use resources efficiently, sourcing raw materials responsibly and avoiding practices that lead to resource depletion.

Waste Reduction

Suppliers must implement measures to reduce waste generation and promote waste prevention at the source.

Reuse and Recycling

Suppliers must maximize reuse and recycling of materials to minimize environmental impact.

Animal Welfare

Suppliers must ensure humane treatment of animals and prohibit animal testing unless required by law.

Biodiversity, Land Use and Deforestation

Suppliers must avoid activities contributing to deforestation, biodiversity loss, or unsustainable land use.

Soil Quality

Suppliers must take measures to prevent soil contamination and degradation.

Noise Emissions

Suppliers must monitor and minimize noise emissions to protect workers and surrounding communities.

Material Compliance & Conflict Minerals

- New Eagle requires our suppliers to comply with existing legal requirements concerning the mining of raw materials in conflict and high-risk territories – so called “conflict minerals” defined in the Dodd-Frank Act and respective EU-regulations. The classification “conflict minerals” includes, independently of their geographical origin, the minerals cassiterite, coltan, wolframite, and their derivatives tin, tantalum, tungsten, as well as gold (together known as 3TG). These raw materials are often mined with the risk of human rights abuses, as well as the risk that armed conflicts will be financed by the sale of these minerals.
- New Eagle does not directly source any of these minerals from mines in the high-risk territories or elsewhere; in fact, the supply chain of these materials consists of many tiers. Before any product reaches our factories, the supply chain includes many stages including mines, smelters, traders, exporters, refiners, alloy producers and component manufacturers. Thus, New Eagle supports the approach of validating smelters and refiners for 3TG, as they play a key role in the supply chain from the mining site to the final product. Within this approach, New Eagle respects the OECD’s “Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.” Considering these OECD principles, we ask our respective suppliers to report the origin and the certification status of the smelters and refiners involved. We regularly report the outcome of our data collection and analysis of the certification status. Relevant suppliers and sub-suppliers are asked to collaborate with smelters and refiners that are conformant with the Responsible Minerals Assurance Process (RMAP) by RMI. The RMAP identifies smelters and refiners that can verify that their raw materials do not originate from suppliers contributing to conflicts in the high-risk areas. We also highly encourage our suppliers to participate in the RMI or similar relevant industry initiatives with the intention to improve the conditions in the extractive industry.
- Our suppliers shall confirm compliance with the UN Global Compact Initiative and with the principles of our New Eagle “Supplier Code of Conduct” as well with their suppliers, or sub-suppliers. New Eagle requests full transparency of critical supply chains and reserves the right to conduct assessments or audits of suppliers at risk. The New Eagle Supplier Survey contains the Conflict Minerals Reporting Template (CMRT) that is required for the supplier onboarding process.
- With respect to further raw materials containing the potential for negative environmental and social impact, we are regularly monitoring related risks and counteract them accordingly, under consideration of the OECD guidelines and existing legal frameworks.

Definition and Implementation of Similar Standards Towards Own Tier-1 Suppliers

Suppliers must define and implement standards consistent with this Code for their own tier-1 suppliers.

Binding Requirements Towards Tier-1 Suppliers to Pass On Standards Along the Supply Chain

Suppliers must ensure that tier-1 suppliers and sub-suppliers are contractually obligated to uphold equivalent sustainability and ethical standards.

Continuous Improvement

All suppliers must commit to continuous improvement and allow audits or assessments to verify compliance with this Code. Failure to comply may result in corrective action, up to and including termination of the business relationship.

Compliance with the Code of Conduct – Compliance Checks

New Eagle reserves the right to take reasonable steps to check for compliance with the Code of Conduct. Suppliers shall actively support any required compliance checks. New Eagle will contact the Supplier beforehand to agree on the scope, time, and place of such checks. The Supplier shall respond to inquiries and requests for information within a reasonable timeframe and in compliance with the formalities specified by applicable data protection laws.

Remedial Actions

Violations are to be ceased immediately, particularly breaches of human rights-related and environmental obligations. Should this not be possible within the foreseeable future, the Supplier shall immediately prepare and execute a plan to stop or minimize such breaches. This plan is to include a specific time schedule. Actions taken shall be documented and reviewed for effectiveness. In the event of a suspected breach, the Supplier is to immediately investigate the potential violations and inform New Eagle of the measures taken to resolve the matter.

Consequences of Breaches

Any dereliction of the obligations described in this Code of Conduct constitutes a breach of contract with New Eagle and a material impairment of the business relationship between New Eagle and the Supplier. The Supplier shall, within a reasonable timeframe, inform New Eagle of the internal corporate measures taken to prevent future derelictions. In the event that the Supplier should fail to comply with these obligations or take appropriate corrective action within a reasonable timeframe, or if the breach of the Code of Conduct is so severe that New Eagle cannot be reasonably expected to continue the business relationship, New Eagle reserves the right – without prejudice to any other rights – to terminate the relationship without prior notice and rescind any associated contracts or agreements.