



OTR Supplier Code of Conduct

OTR International, Inc. and its affiliates (“OTR”) commitment to **SOLUTIONS, VALUE, INNOVATION and PARTNERSHIP** – our brand pillars – not only drives our business, but it also complements what our customers need and expect, and ensures mutual benefit and collaboration long term. To achieve this, we work closely with our supply chain business partners – you - to maintain a relationship based on trust. We are guided by the principles of integrity, ethics, sustainability, and lawful conduct. This Supplier Code of Conduct reflects what OTR expects from its Suppliers, including the requirement that all Suppliers act lawfully and maintain integrity in business transactions.

LEGAL COMPLIANCE

Suppliers shall comply with all applicable governmental regulations. These regulations relate to health and safety of the workers, environment protection, toxic and hazardous materials, and free trade. Suppliers should recognize that the applicable government regulations might include those in the country of manufacture, as well as the country of sale.

CORPORATE SOCIAL RESPONSIBILITY

Suppliers are expected to fulfill their social responsibility towards employees and the company in a broad sense.

TREAT PEOPLE WITH DIGNITY AND RESPECT

Suppliers undertake not to practice any form of forced, child labor or human trafficking and defined by the International Labour Organization (ILO). They must not engage any workers who are younger than the legal minimum age for employment in the relevant jurisdiction. Our Suppliers must be able to certify that they do not engage in any form of forced, involuntary or slave labor. When engaging workers, we expect our Suppliers to verify their legal right to work and to ensure that all necessary legal documentation is in place.

DIVERSITY AND EQUALITY

We expect our Suppliers to adhere to all laws regarding diversity and equal opportunity in their workplaces, and to oppose and to take steps to prevent discrimination based on personal characteristics protected by applicable laws and regulations, such as race, ethnicity, national origin, religion, age, gender, sexual orientation, disability, etc.

HARASSMENT

Our Suppliers must treat their workers with respect and prohibit all forms of harassment and abuse in the workplace. Our Suppliers are expected to implement policies and procedures to prevent harassment and ensure that workers may report instances of harassment without fear of reprisal or intimidation.

QUALITY AND ENVIRONMENTAL

OTR encourages our Suppliers to fulfill the requirements of ISO 14001 and OHSAS 45001.



CONFLICT MINERALS

Supplier must comply with the applicable laws and regulations regarding conflict minerals. If products manufactured and/or delivered by Supplier contains any of the defined conflict minerals of tin, tantalum, tungsten or ores thereof, or gold, OTR must be notified immediately.

OCCUPATIONAL SAFETY

Supplier will comply with the applicable occupational health and safety regulations and will ensure a safe and healthy working environment to maintain the safety and health of employees, to protect third parties, and to prevent accidents, injuries, and work-related illnesses. Supplier undertakes to train their employees appropriately on all occupational health and safety topics.

CONDUCT BUSINESS WITH INTEGRITY

Supplier undertakes to conduct themselves fairly in competition and to comply with the applicable competition regulations, in particular antitrust laws, and to ensure that neither their services nor their goods violate the proprietary rights of OTR and/or third parties. We expect our Suppliers to compete fairly and ethically for OTR's business. Price agreements with competitors, market sharing with competitors, and the abuse of a dominant market position through price discrimination and other conduct are not tolerated. Supplier should avoid any conflict of interest relating to financial interests or other arrangements with our employees that may be considered inappropriate.

SAFEGUARDING TRADE SECRETS

Supplier undertakes to ensure that business information, namely technical, financial or competition related information, is always handled in confidence and in accordance with any non-disclosure and confidentiality agreements. Supplier is required to take appropriate precautions to protect such information to which they have access, including its intellectual property, trade secrets, or financial information.

IMPORT AND EXPORT CONTROLS

Supplier agrees to comply with all applicable export controls, sanctions, customs laws, and regulations, including applicable trade restrictions, embargoes and other constraints on the import and export of goods, services and information. Suppliers undertake to ensure, in particular, that they themselves, their economic beneficiaries, all their representatives and other subcontractors employed by them are not listed as a sanctioned company and/or person on one of the applicable sanctions lists.

ENVIRONMENTAL OBLIGATIONS

OTR is committed to reduce the impact of its products on the environment, and so requires that all Suppliers provide regular updates on the chemicals and substances used in the manufacture of supplied goods, either directly or through sub-suppliers. Supplier complies with the applicable environmental laws, environmental regulations, and environmental standards. As these laws, regulations and standards contain reporting or other cooperation obligations for Suppliers, Supplier will comply with these reporting or other cooperation obligations under their own initiative, in full and within prescribed deadlines.



CONTINGENCY PLAN

The value of a disaster recovery plan is the ability to react to a threat or event swiftly and efficiently. OTR expects its Suppliers to develop and maintain a disaster recovery plan that demonstrate reasonable preparedness for environment disasters, organized and/or deliberate disruption and/or loss of utilities and services.

GENERAL REGULATIONS

It is our goal to build trust-based relationships with our Suppliers who follow our Supplier Code of Conduct. We expect our Suppliers to cooperate with our reasonable requests for information, certification, and/or audit access. When there is a concern, our practice is to work with our Supplier. In the event of suspected violations of the standards and regulations related in the OTR Supplier Code of Conduct and to secure the supply chain, Supplier agrees to OTR conducting audits to check compliance with the OTR Supplier Code of Conduct. This audit may include the Supplier's factory premises, business premises and in their commercial buildings during normal business hours with advance notice of ten (10) working days. OTR is authorized to perform an audit of the Supplier's premises at least once per year.

Supplier is obligated at the request of OTR to provide information and grant access to documents required by OTR to exercise the rights provided to them by way of this OTR Supplier Code of Conduct. The obligation also extends to information about affiliated companies, as well as sub-contractors, insofar as the company obligated to provide information has the information available or can obtain the requested information due to existing legal connections.

Any violation of the provisions of this OTR Supplier Code of Conduct by a Supplier is deemed a breach of essential contractual obligations and gives OTR the right, but not the obligation, to take appropriate measures (e.g. audit with cost implications, termination of the business relationship, contract termination, etc.)

Supplier undertakes to ensure that its employees comply with the requirements of this OTR Supplier Code of Conduct and takes all necessary precautions for the implementation of the requirements.

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