

# SUPPLIER CODE OF CONDUCT

SPX Technologies, Inc. (“SPX”) stands by its core values of **Integrity, Accountability, Excellence, Teamwork and Results**. These values are the foundation of everything we do and are the guiding principles of the [SPX Code of Ethics and Business Conduct](#) (“SPX Code of Conduct”) and this Supplier Code of Conduct (the “Supplier Code”).

SPX is committed to conducting business in accordance with all applicable laws and regulations and with the highest standards of ethics and business conduct. This commitment extends to each of our business relationships, including our relationships with our vendors and suppliers (collectively, “Supplier(s)”). SPX expects its Suppliers to share in this commitment and requires its Suppliers to comply with this Supplier Code while conducting business with or on behalf of SPX. This Supplier Code is in addition to any specific obligations under the Supplier’s written agreement with SPX.

Further, Supplier has the obligation to ensure that its employees, agents and subcontractors who provide products and/or services for the benefit of SPX (collectively, “Representatives”) also comply with this Supplier Code and to educate its Representatives to ensure they understand their obligations and are in compliance with the Supplier Code.

## COMMITMENT TO ETHICS AND COMPLIANCE

This Supplier Code is:

- intended to ensure that SPX’s Suppliers and their Representatives are aligned to the interests and values of SPX in upholding fair, sustainable, responsible, and ethical principles of conduct;
- comprised of minimum standards;
- intended to prevent situations that may call into question the integrity of SPX, its representatives and business partners; and
- not intended to be an exhaustive list of all ethical and business conduct requirements, as SPX understands and expects its Suppliers to have their own internal codes of ethics and conduct.

SPX strongly encourages Suppliers to exceed the requirements of this Supplier Code and promote best practices and continuous improvement throughout their operations, in accordance with SPX’s values.

### Our Values...



#### Integrity

Do what's right, the right way. Both the “what” and the “how” matter.



#### Accountability

Take ownership. Create understanding and develop solutions by communicating with data and transparency.



#### Excellence

Exceed customer expectations through active engagement, relentless focus, and a passion for innovative solutions. Drive constant improvement in everything we do.



#### Teamwork

Engage. Have fun. Make others successful. Our strongest asset is the power of “we.”



#### Results

Make an impact. Focus on what matters. Deliver on commitments.

## INTEGRITY

**Anti-Bribery and Anti-Corruption:** Supplier must have a policy prohibiting any and all forms of bribery, corruption, extortion and embezzlement. Supplier will comply with all applicable anti-bribery laws while conducting business with or on behalf of SPX, which laws include the anti-bribery and anti-corruption laws of the United States, United Kingdom and all other countries in which the Supplier does business, including the United States Foreign Corrupt Practices Act, the UK Bribery Act, and any similar local regulation. Compliance includes (a) not participating in bribes or kickbacks of any kind whether in dealings with government officials or individuals in the private sector, (b) complying with laws governing lobbying, gifts and payments to public officials, political campaign contribution laws and other related regulations, (c) not directly or indirectly offering or paying anything of value (including travel, gifts, hospitality expenses, and charitable donations) to any individual including government officials or employees, government agencies, political parties, public international organizations, or any candidates for political office for the purpose of inducing the individual to misuse his/her position to obtain or retain business or otherwise improperly promote the business interests of SPX. See page 7 of the [SPX Code of Conduct](#) for additional information.

**Gifts and Entertainment:** Supplier will comply with the [SPX Code of Conduct](#) regarding Gifts and Entertainment (see page 8).

**Trade and Customs Compliance:** Supplier must comply with all applicable laws and regulations related to the exportation and importation of products and services. To protect the integrity of cargo being shipped, Suppliers must strive to comply with supply chain security processes and procedures consistent with global and local security procedures as they may apply.

## ACCOUNTABILITY

**Competing Fairly:** Supplier will conduct its business in a fair manner, including in full compliance with all applicable antitrust and fair competition laws. Prohibited activities include collusion and other activities with competitors aimed at influencing prices or conditions, dividing sales territories or customers with competitors, using improper means to obstruct free and open competition, and agreements between customers and suppliers restricting customers' freedom to determine their terms and conditions when reselling goods.

**Conflicts Of Interest:** Supplier must not enter into any transaction with SPX employees that could create an actual or perceived conflict of interest. A conflict of interest is any situation where an individual's interests or relationships could inappropriately influence, or appear to inappropriately influence, decisions an individual makes on SPX's behalf. Even the perception of a conflict of interest between a SPX employee and a supplier could be detrimental to SPX's business interests and reputation. Suppliers must immediately disclose to SPX any conflicts of interest situations that arise. See page 13 of the [SPX Code of Conduct](#) and the [Gifts and Entertainment](#) section of this Supplier Code for additional information.

**Insider Trading:** In working with SPX, Supplier or its Representatives may become aware of Material Non-public information. Supplier will not engage in insider trading by buying or selling SPX's or another company's stock when in possession of Material Non-public Information about SPX or another company.



“Material Non-public information” is information that is not available to the investing public and that could influence an investor's decision to buy or sell stock. See page 14 of the [SPX Code of Conduct](#) for additional information.

**Confidential Information & Data Protection:** While working with or on behalf of SPX, Supplier and its Representatives may be exposed to and/or have access to information relating to SPX, its business and/or its business partners which is proprietary and confidential to SPX or certain third parties and may include personal information (“Confidential Information”). Supplier and its Representatives will properly handle Confidential Information, only use Confidential Information as authorized by SPX or the owner of the Confidential Information and comply with SPX’s Information Security Policy as it relates to Confidential Information. Supplier and its Representatives will take all reasonable steps and actions necessary to prevent and limit the use or disclosure of any Confidential Information. Supplier and its Representatives will comply with all applicable data protection laws and regulations. The obligation to protect SPX’s Confidential Information will continue after the conclusion of Supplier’s or Representative’s work with or on behalf of SPX. See page 15 of the [SPX Code of Conduct](#) and SPX’s Information Security Policy for additional information.

**Intellectual Property:** Supplier will respect the intellectual property ownership rights of SPX and third parties, including but not limited to copyrights, patents, trademarks and trade secrets, and use only information technology and software that has been legitimately acquired and only in accordance with the applicable license terms of use.

**Non-Retaliation:** Supplier shall have adequate programs to address employee and stakeholder concerns and grievances. Those programs must be communicated, protect confidentiality, allow anonymity of raising concerns or reporting unless prohibited by law, and protect employees against retaliation.

## EXCELLENCE

**Protecting Health & Safety:** Supplier and its Representatives will provide all of their employees and independent contractors with a safe and healthy work environment, including by complying with all applicable laws and regulations. Supplier and its Representatives will have safety programs in place to reduce the potential for work-related injuries and will appropriately train their personnel on such programs. Supplier further commits to continuous improvement of working conditions, including safety protocols. Supplier and its Representatives will maintain a workplace that is free of illegal drugs and of alcohol. Supplier will foster a culture where everyone has a role to play in ensuring the safety of themselves, their colleagues, the business operations and our products and services.

**Preventing Workplace Violence:** Supplier and its Representative will cooperate with SPX’s commitment to a workplace free of violence and commit to providing workplaces free of violence for their employees.

**Upholding Human Rights and Sourcing Responsibly:** Supplier and its Representatives will comply with all applicable wage & hour laws and regulations, including those relating to minimum wages, working hours, maximum hours of daily labor, overtime pay, holidays and paid time off. Any use of temporary or outsourced labor must also comply with local and national laws and regulations.

**Slavery, Human Trafficking, Forced Labor and Child Labor.** Suppliers and their Representatives must, and must procure that any other entity involved, directly or indirectly, in their supply chain (a) comply with all



applicable international anti-slavery, human trafficking, forced labor and child labor laws, statutes, regulations and codes, from time to time in force (including without limitation the UK Modern Slavery Act 2015), (b) not support or engage with, and prohibit the use of, slavery, human trafficking, forced labor and child labor (collectively, “Forced Labor”). SPX expects Suppliers and any entity involved in the Supplier’s supply chain to (i) conduct due diligence processes to identify any risks relating Forced Labor, (ii) assess and manage the risk of Forced Labor within their business activities, and (iii) make training about Forced Labor available to their employees. Supplier and its Representatives have a responsibility to report violations to [SPX’s Ethics Hotline](#), or to the Global Human Trafficking Hotline at 1-844-888-FREE or [help@befree.org](mailto:help@befree.org).

**Conflict Minerals:** SPX maintains due diligence processes regarding the potential for Conflict Minerals in its supply chain to ensure its compliance with applicable Securities and Exchange Commission disclosure requirements. Supplier and its Representatives will comply with SPX’s expectations as set forth on its [Conflict Minerals webpage](#).

**Committing to Environmental Responsibility:** Supplier and its Representatives will comply with all applicable environmental laws and regulations. Supplier and its Representatives will be committed to operating in an environmentally responsible manner and implementing sustainable practices, including the reduction of emissions, waste and energy consumption. Supplier and its Representatives will strive to continually improve to reduce potential environmental risks and the impact of its products and operations on the environment.

## TEAMWORK

**Diversity & Inclusion:** Equal employment opportunity practices are integral to SPX’s success and culture. SPX expects its Suppliers to share its commitment to providing equal employment opportunities to employees and prospective employees without regard to race, color, religion, gender, national origin, disability, age, sexual orientation, gender identity and expression, marital status, genetic information, veteran status or any other characteristic protected by law. SPX expects its Suppliers and their Representatives to value different backgrounds, experiences and opinions and to strive to the same or comparable Diversity & Inclusion objectives as set forth in SPX’s [Diversity and Inclusion Statement](#). This commitment includes standing up to discrimination and respecting and valuing our similarities and differences.

**Respectful Workplace:** SPX, its Suppliers and their Representatives are committed to ensuring everyone has the right to work in an environment that is free from intimidation, harassment and abuse. Supplier and its Representatives will not condone or permit an offensive or intimidating work environment caused by remarks or actions based on race, color, religion, national origin, citizenship, sex (including pregnancy), sexual orientation, gender identity, protected veteran status, marital status, age, genetic information, disability or any other reason protected by law.

## RESULTS

**Product Safety & Quality:** Supplier must take due care to ensure its work product meets SPX’s quality standards. SPX expects its Suppliers to have controls and processes in place that ensure (a) the delivery



of a product whose quality meets or exceeds the contract requirements, (b) Supplier can identify any defects prior to shipment, and (c) Supplier can implement any needed corrective actions to address any quality or safety issues. Supplier and its Representatives are also expected to ensure that the products Supplier provides to SPX are high quality. Supplier will notify SPX of (i) any defective products, (ii) any information that may impact SPX's reputation, or (iii) any material issues that might disrupt Supplier or Supplier's ability to produce products, provide services or meet timelines.

**Business Records:** Supplier will honestly and accurately complete, record, report, retain and dispose of business information and records in full compliance with applicable legal and regulatory requirements. Suppliers must never make any entry in their books and records or alter, conceal, or destroy any document to misrepresent any fact, circumstance or transaction related to SPX business.

## **SUPPLIER COMPLIANCE, EXPECTATIONS & VIOLATIONS**

### **SUPPLIER RESPONSIBILITIES**

Each Supplier is expected to take active steps, including performing audits and inspections, to ensure its compliance with this Supplier Code, including all applicable legal and regulatory requirements. Each Supplier is responsible for the actions of its Representatives, including ensuring that its Representatives understand and comply with this Supplier Code and promptly informing SPX if Supplier or any Representative is in violation of this Supplier Code. Upon SPX's request, Supplier and Supplier's Representatives will sign a certification acknowledging that Supplier (or Supplier's Representative, as applicable) agrees to, and will comply with, the terms of this Code.

SPX expects our Suppliers to take action to prevent, detect, and correct any retaliatory actions. Commensurate with the size and nature of their business, we expect our Suppliers to have management systems in place to support compliance with applicable laws and this Supplier Code. Supplier will provide its Representatives with avenues for raising legal or ethical issues or concerns without fear of retaliation, and Supplier must have a process to investigate and resolve such issues and concerns.

### **MONITORING**

SPX or its representatives may engage in monitoring activities to confirm Supplier's compliance with this Supplier Code, including on-site inspections of facilities, required certifications, use of questionnaires, surveys or report cards, review of publicly available information, or other measures necessary to assess Supplier's performance. Upon SPX's request and subject to applicable laws, Supplier will permit SPX and its authorized representatives to, during normal business hours, inspect and audit Supplier's and its Representatives' facilities (including subcontractor facilities), books and records to assess Supplier's compliance with this Supplier Code. All documentation must be accurate, free from any attempt to falsify or mislead and made available promptly upon request to any SPX person conducting an audit. In addition to any other rights SPX may have under its written agreement with Supplier, SPX may require Supplier to immediately remove any Representative from working with or on behalf of SPX if the Representative exhibits behavior that is unlawful or inconsistent with this Supplier Code or any other applicable SPX policy.

### **VIOLATIONS**

SPX is committed to a "speak up" environment where open, honest communications are the expectation, not the exception. If Supplier identifies an area of non-compliance, Supplier will notify SPX of the non-compliance as well as its proposed corrective actions, including a timeline.



SPX will not tolerate (a) violation or circumvention of (i) any applicable laws or regulations, (ii) this Supplier Code, or (iii) other contractual obligations or (b) the engagement in unethical dealings in connection with SPX's business, in each case, by a Supplier or its Representatives.

Reporting. Supplier and its Representatives should report potential violations of the Supplier Code, policies or laws and regulations to SPX's Ethics Hotline at [www.ethicspoint.com](http://www.ethicspoint.com) or 1-866-ETHICSP (384-4277). The Ethics Hotline is operated by an independent third-party and allows individuals to anonymously submit a report (where permitted by law). The Ethics Hotline supports multiple languages and is available 24 hours a day, 7 days a week. SPX reviews and investigates all reports made to the Ethics Hotline.

Consequences for Violating the Supplier Code. In the event of a violation of the Supplier Code, SPX may pursue corrective action to remedy the situation. In the case of a violation of law or regulation, SPX may be required to report those violations to proper authorities. SPX reserves the right to terminate its relationship with any Supplier who fails to comply with this Supplier Code or fails to cooperate with any related investigation.

SPX thanks its Suppliers and their Representatives for their cooperation with this important Supplier Code of Conduct and looks forward to a mutually beneficial relationship based on the highest levels of ethical behavior.



## Supplier Code of Conduct – On-Site/Access Addendum

While working with or on behalf of SPX, Supplier and its Representatives may have access to or use of certain SPX assets (including Confidential Information and/or IT systems) and facilities. In such cases, Supplier and its Representatives will:

**Health & Safety:** Support SPX's policy of compliance with applicable laws and regulations regarding health and safety. Supplier and its Representatives will abide by all SPX safety rules and practices, assume responsibility for taking the necessary precautions to protect themselves and co-workers, and promptly report any unsafe practices or conditions to SPX. SPX is committed to providing a safe and healthy work environment for colleagues and visitors to our facilities.

**Acceptable Use:** Use the physical and intellectual assets of SPX, including property, supplies, consumables and equipment, and other SPX-provided information technology and systems (including e-mail, Internet and voicemail) only for SPX business and only when use is authorized by SPX. Supplier and its Representatives will not use SPX-provided technology and systems to (i) create, access, store, print, solicit or send any material that is intimidating, harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate, or (ii) send any false, derogatory, or malicious communications.

**Ownership:** Not remove assets (including intellectual property or other intangible assets) or systems from SPX facilities. These assets and systems, and all communications, information and data stored, transmitted or received on SPX-owned or leased equipment is and will remain SPX's property.

**Information Security:** Comply with SPX's Information Security Policy, which includes SPX requirements for passwords, confidentiality, security, and privacy procedures, including without limitation, those related to SPX's internal corporate network, systems and buildings. SPX may monitor all use of its corporate networks and systems and access all communications, information and data stored, transmitted or received using SPX's networks and systems.