

INNIO Supplier Code of Conduct

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A Message from INNIO

INNIO Group is committed to unyielding integrity and high standards of business conduct in everything we do, especially in our dealings with our suppliers, contractors, joint venture partners, and consultants (collectively “Suppliers”).

The objective of this INNIO Supplier Code of Conduct (hereinafter referred to as “Code”) is to establish a basis for positive development of sustainable procurement practices through regular dialogues and ongoing working relationships with our Suppliers.

INNIO bases our Supplier relationships on lawful, efficient, and fair practices, and Suppliers must adhere to the principles detailed in this Code and all applicable laws and regulations.

This Code reflects our commitment to the 10 principles of the United Nations Global Compact and our respect for universally recognized normative standards such as the United Nations Universal Declaration of Human Rights, ISO standards on HSE, and the core labor conventions of the International Labour Organization (ILO).

Suppliers are responsible for ensuring that they and their representatives such as directors, officers, and employees comply with the standards of conduct set out in this Code and in other contractual obligations to INNIO. Our Suppliers also are required to implement

the principles and standards of this Code or similar internationally recognized standards to their own business partners, including suppliers, contractors, joint venture partners, and consultants.

Please contact the INNIO manager you work with or any INNIO Compliance Resource (e.g., INNIO’s Procurement Compliance Lead) if you have any questions about this Code or the standards of business conduct that all INNIO Suppliers must meet. In the event that standards in this Code conflict with local and national laws as well as international standards, we encourage our Suppliers to address such conflicts with us to jointly establish the most appropriate course of action.

INNIO shall have the right, upon prior written notice, to conduct audits to verify the Supplier’s compliance with its obligations under this Code, either itself and/or through third-party auditors. In case of severe violations of the Code, INNIO reserves the right to take actions including and up to termination of contracts.

Responsibilities of INNIO Suppliers

You, as a Supplier to INNIO, agree to:

Environmental, Social, and Governance (ESG):

- Comply with the applicable environmental and social protection laws and regulations
- Take note and support the Sustainable Development Goals as published by the United Nations
- Use natural resources, raw materials, and energy responsibly
- Provide periodically and on request ESG data to INNIO
- Set goals concerning the ESG standards and continuously address climate challenges, including limiting the temperature increase to no more than 1.5 degrees Celsius compared to pre-industrial levels by mid-century

Fair Employment Practices:

- Observe applicable laws and regulations governing wages and hours, recruitment, and employment contracts
- Allow workers to choose freely whether to organize or join associations of their own choosing for the purpose of collective bargaining, as provided by local law or regulation
- Prohibit discrimination, harassment, and retaliation
- Upon end of employment, reimburse return transportation costs for workers recruited from outside the country
- Not charge workers recruitment fees or utilize firms charging workers such fees
- Not use fraudulent or misleading recruitment practices
- Not hold or destroy a worker’s identity or immigration documents
- Provide workers with terms and conditions of employment in a language the worker understands

Environment, Health, & Safety:

- Comply with applicable environmental, health, and safety (EHS) laws and regulations
- Provide workers a safe and healthy workplace
- Not adversely affect the local community
- If housing is provided or arranged, it must meet host country safety standards

Human Rights:

- Respect human rights of your employees and others in your business operations and your activities for INNIO
- Not employ workers younger than 16 (sixteen) years of age or below the applicable minimum age, whichever is higher
- Not use forced, imprisoned, or indentured labor, or workers subject to any form of physical, sexual, or psychological compulsion, exploitation, or coercion, or engage in or abet trafficking in persons
- Adopt policies and establish systems to procure tantalum, tin, tungsten, and gold from sources that have been verified as conflict free
- Provide supporting data on your supply chain for tantalum, tin, tungsten, and gold to INNIO when requested, as detailed in INNIO's [Conflict Minerals policy](#)

Working with Governments Regarding Anti-Bribery and Anti-Corruption and Dealings with INNIO Employees and Representatives:

- Maintain and enforce a policy requiring adherence to lawful business practices, including a prohibition against bribery of government officials
- Not offer or provide, directly or indirectly, anything of value, including cash, bribes, gifts, entertainment, or kickbacks, including offers of employment, or participation in a contest, game, or promotion, to any INNIO employee, representative, or INNIO customer or to any government official in connection with any INNIO procurement, transaction, or business dealing
- Provide supporting data to INNIO when requested

Competition Law:

Not share or exchange any price, cost, or other competitive information or engage in any collusive conduct with any third party with respect to any proposed, pending, or current INNIO procurement.

Intellectual Property:

Respect the intellectual and other property rights of INNIO and of third parties, including all patents, trademarks, and copyrights.

Security and Privacy:

- Respect privacy rights and secure the data of INNIO employees, customers, and suppliers (collectively, "INNIO data")
- Implement and maintain physical, organizational, and technical measures to ensure the security and confidentiality of INNIO data to prevent accidental, unauthorized, or unlawful destruction, alteration, modification or loss of INNIO data, misuse of INNIO data, or unlawful processing of INNIO data
- Protect Supplier operations and facilities against exploitation by criminal or terrorist individuals and organizations

Trade Controls, Customs Matters, and Tax Law:

- Not transfer INNIO technical information to any third party without the express, written permission of INNIO
- Comply with all applicable trade control laws and regulations in the import, export, re-export, or transfer of goods, services, software, technology, or technical data, including any restrictions on access or use by unauthorized persons or entities
- Not take or participate in any actions that may be viewed as tax evasion or the facilitation of tax evasion

Business Process Controls:

Ensure that all invoices and any customs or similar documentation submitted to INNIO or governmental authorities or audited by third parties in connection with transactions involving INNIO accurately describe the goods and services provided or delivered and the price thereof to safeguard that all documents, communications, and accounting are accurate and honest.

How to Raise a Question or Concern

Subject to local laws and any legal restrictions applicable to such reporting, each INNIO Supplier is expected to inform INNIO promptly of any concern related to this Code affecting INNIO, whether or not the concern involves the Supplier, as soon as the Supplier has knowledge of such an occurrence. INNIO Suppliers also must take such steps as INNIO may reasonably request to assist INNIO in the investigation of any such occurrence involving INNIO and the Supplier. If the Supplier's work is related to a U.S. government contract, the Supplier must notify INNIO of any alleged non-conformance with this Code.

Define your question/concern:

- Who or what is the concern?
- When did it arise?
- What are the relevant facts?

Prompt reporting is crucial:

A question or concern may be raised by an INNIO Supplier as follows:

- By discussing with a cognizant INNIO Manager
- By emailing compliance@innio.com
- By contacting INNIO's "SPEAK UP!" Infoline +43 5244 600 1010 or +1 289 309 3777
- By contacting any Compliance Resource (e.g., INNIO's Group Head of Compliance)

INNIO Policy forbids retaliation against any person reporting such a concern in good faith.

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Authorized by: VP Procurement and Group Head of Compliance

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