

# Vendor Code Of Ethics



Alto is committed to maintaining the highest legal, social, and ethical standards in its relationships with employees, shareholders, customers, vendors, competitors, governments, communities and the environment. At Alto our values are personal responsibility, honesty, sustainability, and entrepreneurship. These values are embedded in what we do and the foundation of our business. Our values guide us when choosing our partners. We expect our vendors to share our values; to recognize and uphold legal, social, and ethical standards of production and to care for the environment. Alto will work collaboratively with our vendors to achieve a resilient and truly sustainable supply chain.

**Environment:** The Vendor must protect environmental health by adhering to all applicable regulatory requirements, including but not limited to air, water, ground, and waste management. The Vendor must continuously work towards mitigating negative environmental impacts in daily operations.

**Health and Safety:** The Vendor must provide a safe and healthy workplace which meets the applicable laws and regulations. The Vendor must take adequate steps to prevent accidents and injuries.

**Human Rights and Non-Discrimination:** The Vendor must respect the rights and dignity of all persons they deal with. This includes prohibition and elimination of child and forced labor, slave labor, freedom of employment and association, compensation and benefits in accordance with applicable laws and promotion of equal opportunity and treatments in employment. Vendors must ensure employees are not subject to any discrimination or harassment in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of sex, gender identity, race, religion, age, disability, illness, marital status, pregnancy, sexual orientation, nationality, political opinion, social or ethnic origin, or other protected status.

**Materials Compliance:** At Alto, we are determined to comply with regulatory and customer requirements regarding the prohibition and restriction of substances, including hazardous substances and conflict minerals. Therefore, vendors must ensure that the goods provided to Alto are in compliance with requirements covered under the scope of all relevant regulations including but not limited to conflict-free mineral supply, ROHS and REACH compliance.

**Protection of Assets and Confidentiality:** Vendors must keep Alto's business, financial and technical data as well as business correspondence including but not limited to pricings, costs, customers, and designs confidential and not misappropriate Alto's tangible or intellectual property.

**Gifts and Entertainment:** Whenever a gift or entertainment is offered in the context of a business relationship, there is a risk that it may influence, or appear to influence, a business decision. In order to build and maintain the trust of our stakeholders, Alto discourages gifts or entertainment exceeding nominal value, such as an item bearing the logo of the vendor, to or from any of Alto's vendors.

**Trade Control:** Vendors must adhere to applicable export control regulations. Vendors must indicate correct and itemized foreign trade data in all trade documents including but not limited to origin country and customs tariff number.

**Application to Vendors and their Suppliers and Subcontractors:** This Code is intended to apply also to the vendors' subcontractors and suppliers providing goods or services. Therefore, vendor must use reasonable efforts to ensure their subcontractors' compliance with this Code.