



Vertiv Supplier Code of Conduct

Vertiv expects our suppliers to project our values and principles, to stay current with technology, to act with integrity, and to treat people and the environment with respect. These actions reflect Vertiv's priorities. In this way, we partner with only the highest caliber suppliers that demonstrate social responsibility and a commitment to fairness and honesty.

Vertiv has modeled its Supplier Code of Conduct on the [Responsible Business Alliance \(RBA\) code of conduct](#). We encourage all our suppliers to familiarize themselves with this Supplier Code of Conduct, as we expect each supplier, including supplier parties, to adhere to these principles not only within its own operations but also throughout its entire supply chain. Vertiv may discontinue its relationship with suppliers who fail to comply with this Supplier Code of Conduct. As used herein, "supplier parties" means supplier and its employees, agents, consultants, subcontractors, and independent contractors.

A. Human Rights and Labor

Suppliers shall uphold the highest standards of human rights and treat employees with respect and dignity as recognized by international standards. This applies to all types of employees including temporary, migrant, contract, student, direct and indirect employees. Following sections describe further details of principles related to Human Rights and Labor which suppliers shall uphold.

1. Freely chosen employment - Prohibition of Forced Labor – Forced Labor is understood to be defined by the set of definitions established by the ILO Forced Labor Convention (No. 29) and the Abolition of Forced Labor Convention (No. 105). All suppliers must ensure that no forced labor, including bonded, indentured, and involuntary or exploitative prison- or slave-labor is used, and suppliers shall not participate in human trafficking. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction, or fraud for labor or services and commercial exploitation, including the sexual exploitation of men, women, or children. Suppliers shall not impose any unreasonable restrictions on a worker's freedom of movement in company's facilities including entering and exiting, and if applicable, housing facilities, e.g., employees dormitories or living quarters. All employees must be provided with the written employment agreement in the employees native language which includes a description of terms and conditions of employment as a part of the hiring process. All work must be voluntary, and employees shall be free to leave work at any time or terminate their employment without penalty, discipline, or retaliation or threat thereof, if reasonable notice is given as per employees contract. Suppliers can only hold employees documentation if such holdings are required by law. In this case, at no time should employees be denied access to their documents. Supplier's employees are not required to pay employers' agents or sub-agents' recruitment fees or other related fees for the employment. If any such fees are found to have been paid by employees all such fees shall be repaid to the employee.

2. Migrant Workers – If supplier uses a migrant worker labor force and brings migrant workers into the country for the purpose of working for supplier, supplier shall pay or provide for return transportation of these workers at the end of their working period. Suppliers shall not charge migrant workers, directly or indirectly, any recruitment or other fees and migrant workers' identity documents or work permits should not be destroyed, concealed, withheld or otherwise abducted from workers by the supplier. All migrant workers shall be provided a written employment agreement in a language which is understood by the workers prior to the departure from their country of origin. No substitutions or changes are allowed in this employment agreement upon arrival in the country of work unless the changes are made to meet local law or to provide equal or better terms for the worker.
3. Prohibition of Child Labor – Child Labor is understood to be defined by the set of definitions established by the ILO Minimum Age Convention. Vertiv's policies oppose child labor, and we forbid our suppliers to use child labor in any facility or business. Suppliers shall not employ any persons under the age of 15 or the applicable minimum legal age for employment, whichever is greatest. They shall comply with all local child labor laws and applicable international standards. Suppliers shall implement an appropriate process to verify worker's age. Employees under age 18 shall not conduct work which can possibly jeopardize their health and safety and shall not work on night shifts and overtime. If suppliers employ student employees, suppliers shall ensure proper support, training, and management of student employees to ensure protection of students' rights in accordance with all applicable laws and regulations. If the local law does not regulate wage rate for student employees, the wage rate for student employees, interns and apprentices shall be based on the same wage rate as other entry-level employees performing equal tasks.
4. Working Time – We stress to our suppliers the importance of operating with reasonable working hours and maintaining a positive and productive work environment consistent with commonly accepted practices in each locale. Vertiv expects its suppliers to operate in full compliance with all applicable laws regarding work hours, vacation time, overtime, and holidays. Supplier employees should have the right to work no more than a maximum of 60 hours per week (48 regular hours of work and maximum of 12 hours of voluntary overtime) and be provided a rest period of at least 24 hours every 7 days, except in emergency situations or unless otherwise stated and clearly defined and allowed by national laws and employees agreements.
5. Wages and Benefits – We expect our suppliers to operate in full compliance with all applicable legal requirements regarding wages and benefits. All supplier employees must be compensated with wages that meet applicable legal requirements or, if there is no legal minimum wage, wages that align with the prevailing sector wage in an amount sufficient to cover basic living requirements. Employees should not face deductions from earned pay as a disciplinary measure and should be entitled for the payment of overtime work at a higher/premium rate. Suppliers shall provide its employees written documentation for each pay period covering all information related to the wage in the language which is understandable to them. The use of temporary, dispatch and outsourced labor must be in accordance with the limits of the local law.
6. Humane Treatment – Vertiv objects to any form of harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, verbal abuse, violence, gender-based violence, bullying, public shaming, and threat of any above-mentioned treatment. Disciplinary policies and procedures about human treatment shall be clearly defined and communicated to all employees.

7. Non-Discrimination – Our company expects suppliers to prohibit discrimination against or harassment of any employee or applicant on the basis of age, race, color, religion, creed (employees shall be provided with reasonable accommodation for religious practices), sex, pregnancy status (including childbirth, breastfeeding, or related medical conditions), marital status, gender, sexual orientation, gender identity / expression (including transgender status or sexual stereotypes), genetic information, citizenship status, national origin, protected veteran status, political affiliation, union membership, disability, ethnic group, or any other factor deemed unlawful. It is expected that the discrimination in terms of employment type, promotion and remuneration, rewards and access to training is also prohibited. Suppliers should promote equal opportunities and shall not discriminate against any worker. In addition, employees as well as potential employees should not be subjected to medical tests or physical exams which could be used in a discriminatory way.
8. Freedom to Associate – Suppliers should respect the rights of employees to associate freely and seek representation in accordance with local laws and respect the right for collective bargaining. Suppliers should further respect employees' right to engage in peaceful assembly and right to join, form, or not to join a labor union without fear of reprisal, intimidation, or harassment. Employees shall be allowed to openly communicate and share ideas and concerns regarding to working conditions and management practices with management without fear of reprisal, intimidation, harassment, and discrimination in any form. Supplier should allow employees to establish other means how to facilitate freedom of association and collective bargaining when these are restricted under the law.
9. Regular Employment – Suppliers shall operate in a way which ensures the regular employment (permanent and direct) and commit to limit the non-regular employment (fixed-term contracts, contracted labor) if it is allowed by the nature of their business.
10. Use of Recruiters and Upstream Suppliers – If suppliers use third party recruitment agencies, they shall ensure that these are compliant with Vertiv Supplier Code of Conduct and all applicable laws. All costs related to the use of recruiters must be covered by suppliers. Suppliers shall ensure that their upstream suppliers are compliant with all the above-described provisions of Vertiv Supplier Code of Conduct.

B. Health and Safety

We expect our suppliers to have a healthy and safe working environment in accordance with all applicable laws and regulations and to protect employees from short, immediate, and long-term harm. Suppliers should recognize the importance of ongoing worker education and inputs in proactively identifying and solving health and safety related issues in the workplace.

1. Occupational Safety – Suppliers shall identify and assess worker's potential exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) and mitigate risks using the Hierarchy of Controls which includes hazard elimination, materials or processes substitution, controlling through proper design, administrative and engineering controls implementation, preventative maintenance and safe work procedures (including lockout/tagout), and providing constant occupational health and safety training. In cases when hazards cannot be eliminated or adequately controlled, supplier shall provide employees with appropriate, well-maintained, personal protective equipment and educate

employees about risks associated to these hazards. Additionally, suppliers shall implement reasonable actions to ensure that pregnant women and nursing mothers are removed from working conditions with high hazards and remove or reduce possible workplace health and safety risks which pregnant women or nursing mothers may be exposed in their workplace, including those associated with their regular work tasks and provide safe reasonable accommodations.

2. Emergency Preparedness – Vertiv expects its suppliers to identify and assess potential emergency situations and events and implement emergency plans and response procedures which include emergency reporting, employee notification and evacuation procedures, regular training and drills in order to minimize impact of such situations and events. Emergency drills must be executed at least once a year or more often if required by local law. Suppliers shall ensure that emergency plans include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. All emergency plans and procedures shall aim to minimize harm to life, the environment, and property.
3. Occupational Injury and Illness – Vertiv’s suppliers shall maintain procedures and systems to prevent, manage, track and report occupational injuries and illness. These should include provisions to encourage worker reporting, classification and recording of injury and illness cases, providing information about necessary medical treatment, investigation of the occupational injury and illness cases and implementation of corrective actions to eliminate their cause and ensure their prevention, as well as facilitate worker’s return to work.
4. Industrial Hygiene – Vertiv expects suppliers to identify, assess and control worker’s potential exposure to chemical, biological, and physical agents and mitigate potential risks through Hierarchy of Controls. If supplier identifies any potential hazard, supplier should try to eliminate and/or reduce the potential hazard to the lowest possible level. If it is not feasible to eliminate or reduce the potential hazard, the hazard needs to be thoroughly controlled through proper design, engineering, and administrative controls. If such means of control cannot be applied, employees must be provided with appropriate, well-maintained, personal protective equipment free of charge and use the PPE in appropriate way. Employees shall be entitled to ongoing protective programs which include educational materials about potential risks associated with potential hazards.
5. Physically Demanding Work – Suppliers shall implement policy towards safe standards for physically demanding work. Worker exposure to hazards connected to physically demanding assignment such as manual material handling, heavy or repetitive lifting, prolong standing, or highly repetitive or forceful assembly task should be identified, evaluated, and controlled. Employee exposure to above mentioned physically demanding tasks shall be in accordance with safe levels identifying employees maximum exposure to physically demanding tasks set by local regulations and/ or international standards protecting employees health and safety.
6. Machine Safeguarding – Vertiv expects its suppliers to ensure the safety of machines used in their operations. Production and other machinery shall be monitored and evaluated for any potential safety hazards. If machinery presents potential injury hazard to employees, physical guards, interlocks, barriers,

and other necessary means must be provided and maintained properly to protect employees and all people manipulating with the machinery.

7. Sanitation, Food, and Housing – In order to ensure acceptable working and living conditions to employees, supplier must provide its employees barrier-free access to clean toilet facilities, potable water and sanitary food preparation, storage and eating facilities. If the supplier provides housing facilities to its employees directly or through labor agent, these facilities must be maintained to be safe and clean, and equipped with barrier-free emergency exits, hot water, adequate lightning, heat and ventilation, individually secured accommodation for storing personal items and to provide reasonable personal space along with barrier-free entry and exit privileges.
8. Health and Safety Communication – Supplier shall provide its employees with appropriate workplace health and safety information and training in the language which is understood by the employees for all identified workplace hazards that employees may be exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. All information and training shall be provided to employees prior to the beginning of work and regularly thereafter. Supplier should ensure that health and safety information are clearly posted in the operations facility or placed in location identifiable and accessible by all employees. Employees should be encouraged to raise any health and safety concern without fear of retaliation.

C. Environment

Suppliers should operate their facilities in a manner that protects the environment and meets or exceeds applicable laws and regulations. Suppliers shall be aware of their environmental impacts and minimize negative effects on the environment, community and natural resources within their manufacturing operations as well as safeguarding the health and safety of the public. We further stress the need to our suppliers to foster programs that reduce energy consumption and waste in facilities, importance of creating innovative products and services that improve energy efficiency and reduce environmental impacts. Suppliers are expected to cooperate with upstream suppliers which have the proactive approach towards environmentally friendly policies, and which are focusing on the reduction of the negative environmental impact.

1. Environmental Permits and Reporting – Vertiv suppliers shall obtain, maintain, and keep current all required environmental permits (e.g., discharge monitoring), approvals and registrations, and their operational and reporting requirements are to be followed.
2. Pollution Prevention and Resource Reduction – Vertiv expects its suppliers to tightly control their emissions and discharge of pollutants as well as generation of waste. These should be minimized at the source or by practices such as addition of pollution control equipment, production modification, good maintenance, facility processes or by other adequate means. Suppliers shall ensure the responsible use of natural resources, including protection of water, fossil fuels, minerals, and virgin forest by practices such as materials reusing or substitution, conservation, recycling or other environmentally friendly means.
3. Substances of Concern – Suppliers shall identify, label, and manage hazardous substances such as chemicals and waste and other materials posing risks to humans and environment in order to ensure safe

handling, movement, storage, use, recycling, reuse and disposal of these materials. Importantly, suppliers shall reduce the use of the substances of concern and persistent bio-accumulative toxins in their operations as much as feasible and meet or exceed any relevant registration, labeling, or notification requirements. Suppliers shall handle and dispose of any hazardous material in the most environmentally friendly way, minimizing human exposure and pollution in accordance with applicable law.

4. Solid Waste – Vertiv expects its suppliers to implement a systematic approach and procedures to effectively identify, manage, reduce and responsibly dispose of or recycle solid non-hazardous waste.
5. Air Emissions – Suppliers shall manage their air emissions in favor of environment as much as feasible. Suppliers shall implement a process in which air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are characterized, monitored, controlled, and treated as required prior to discharge. Ozone-depleting substances shall be effectively managed in accordance with the Montreal Protocol and applicable regulations. Suppliers shall conduct routine monitoring of the performance of their air emission control systems.
6. Material Restrictions – Vertiv requests its suppliers to adhere to all relevant applicable laws, regulations and specific customer requirements regarding the prohibition or restriction of use of specific substances in products and manufacturing, including labelling for recycling and disposal in all products concerning supply to Vertiv. Suppliers must ensure that all products supplied to Vertiv meet all related material and chemical content requirements in the markets into which they are sold and shipped. This includes REACH, RoHS, WEEE, TSCA, California Proposition 65, POPs and similar regional or local regulations.
7. Water Management – Suppliers shall have a water management program which documents and characterizes the use and discharge of water; and seeks opportunities for water conservation; and controls channels of contamination. All wastewaters must be monitored, controlled, and treated in accordance with applicable regulations prior to its discharge or disposal. Suppliers shall conduct regular monitoring of the performance of the wastewater treatment and containment system to ensure optimal performance and regulatory compliance.
8. Energy Consumption and Greenhouse Gas Emissions – Suppliers shall track and document their levels of greenhouse gas emissions, set reduction targets, and aim to minimize their greenhouse gas emissions with the use of feasible technologies which are environmentally friendly, and which minimize harmful emissions. Suppliers shall report on its greenhouse gas emissions, as needed, to show progress against greenhouse gas emissions reduction goals. Suppliers shall seek methods how to improve energy efficiency and how to minimize the energy consumption through the responsible use of energy with the use of renewable energy sources and energy conservation.

D. Ethics

Vertiv seeks to do business in accordance with the highest ethical standards and expects the same commitment from its suppliers, therefore suppliers are expected to uphold the following standards.

1. Business Integrity and Highest Ethical Behavior – Our policies and practices direct Vertiv employees to

conduct business lawfully and ethically wherever we operate. We adhere to firm, uncompromising standards for Vertiv's leadership and employees with respect to interactions with customers; and we expect that our suppliers comply with these same ethical standards as they work on Vertiv business.

2. Anti-corruption – We expect our suppliers to comply with all laws and regulations forbidding payment of money, giving, or accepting anything of value, promising, offering, authorizing, products, gifts or services, directly or indirectly, to any individuals or entities as an attempt to improperly induce favorable business treatment or to improperly affect governmental decisions. Extortion or embezzlement, bribes, kickbacks, and similar payments are strictly prohibited. Vertiv suppliers are expected to have monitoring, record keeping and enforcement procedures in place to ensure compliance with anti-corruption principles and laws.
3. Conflict of Interest – Vertiv considers it inappropriate for suppliers' employees to have any personal business or financial interest that conflicts with his or her responsibilities to their employer. Suppliers should inform Vertiv of any actual and potential conflicts of interest that may arise from business or personal relationships with our customers, suppliers, business associates, employees, or competitors.
4. Disclosure of Information – Suppliers shall perform their activities transparently and shall accurately reflect business related information in official records. In reports, suppliers should include information about business activities, structures, financial situation, performance, labor, environmental practices and health and safety all in accordance with applicable regulations. No falsification or misinterpretation is acceptable.
5. Intellectual Property – Intellectual property rights are to be respected. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights and customer and supplier information is to be appropriately safeguarded.
6. Fair Business, Advertising and Competition – Vertiv suppliers are expected to abide by the standards of fair business, advertising, and competition. These standards prohibit actions which may unreasonably restrain trade, such as, but not limited to market allocation, price-fixing, bid rigging or predatory pricing and also prohibit anticompetitive mergers and acquisitions as well as certain business practices by dominant companies.
7. Protection of Identity and Non-Retaliation – Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law. Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.
8. Responsible Sourcing of Minerals – Vertiv suppliers which supply products containing metals such as gold, tantalum, tin, tungsten (3TG) and cobalt must implement a conflict minerals policy and exercise due diligence on the provenance of the 3TG metals and cobalt which are used with the products being supplied to Vertiv. Suppliers shall further reasonably assure that above mentioned minerals included in supplier's products are sourced in a way consistent with the Organization for Economic Co-Operation and Development (OECD) Guidance for Responsible Supply Chain of Minerals from Conflict Affected and High-Risk Countries. Updated October 2022

Risk Areas or an equivalent, recognized due diligence framework. Suppliers should source 3TG material and cobalt only from conflict-free smelters or refiners as recognized by Responsible Minerals Alliance or similar recognized organization to ensure that products supplied to Vertiv do not support armed conflicts and human rights violations.

9. Privacy – Suppliers are to protect the reasonable privacy expectations of personal information of everyone with whom they do business, including suppliers, customers, consumers, and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.
10. Ethics Hotline – To facilitate reporting of ethics concerns, we provide Vertiv employees and suppliers an Ethics Hotline in the more than 80 countries where we operate. Reports to the hotline are anonymous if requested. We tolerate no form of reprisal against anyone who report concerns. Employees and suppliers may report a concern related to business conduct issues by contacting Vertiv's Ethics and Compliance reporting tool and hotline numbers at <http://www.Vertivco.ethicspoint.com>.

E. Management Systems

Suppliers should maintain a management system that demonstrates adoption of the principles embodied in this Supplier Code of Conduct and that tracks and documents compliance with all applicable laws, government policies and regulations and customer requirements. Supply chain transparency is required to confirm compliance with this Supplier Code of Conduct. Accordingly, suppliers shall cooperate with Vertiv in any requests for documentation, onsite audits, and associated action plans. Management system shall support continual improvement and include identification and mitigation of operation risks to this Code and involve the following elements.

1. Company Commitment – Corporate social and environmental policy supported by statements confirming supplier's commitment to compliance and continual improvement, endorsed by executive management, and available in local language in all supplier's facilities.
2. Management Accountability and Responsibility – Supplier shall identify senior executives and company representatives responsible for the management system and its implementation. The status of the management systems shall be reviewed by senior executives on a regular basis.
3. Legal and Customer Requirements – Suppliers must have a process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.
4. Content and Origin Reporting – Suppliers must have a process to ensure compliance with product-related requirements, such as conflict minerals, REACH, RoHS, TSCA, CA Prop 65, POPs, Critical Minerals, and upon request, suppliers shall provide declarations regarding the material content and origin of products delivered to Vertiv or its third-party administrator. These disclosures may include Certificates of Conformance or Compliance, Conflict Minerals CMRT, Extended Minerals Reporting Template EMRT, Full Material Disclosures FMD, and other applicable declarations.

5. Risk Assessment and Risk Management – Supplier shall maintain a process to identify legal compliance, environmental health and safety and labor practice as well as ethics risks associated with supplier's operation. Identified risks shall be assessed and the appropriate procedural and physical controls to monitor the identified risk shall be implemented to ensure regulatory compliance.
6. Improvement Objectives – Supplier shall set improvement objectives, targets and implementation plan to improve its social, environmental and health and safety performance. These should be available in clear written form and supplier's performance against them shall be periodically assessed.
7. Training – Suppliers should maintain programs for training managers and employees to implement policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.
8. Communication – Through the management system, suppliers are expected to maintain process through which supplier clearly communicate accurate information about company policies, practices, expectations, and performance with its employees, suppliers, and customers.
9. Worker Feedback, Participation and Grievance – Supplier's Management system should introduce and keep ongoing process (which includes effective grievance mechanism) to assess employee's understanding of the principles covered by this Code, understanding of violations against this Code and creates space for employee's feedback in safe environment without fear of reprisal and retaliation.
10. Audits and Assessments – Through the management system, suppliers need to maintain periodic self-evaluations to ensure conformity to customer contractual requirements related to social and environmental responsibility, the content of this Code and all applicable legal and regulatory requirements.
11. Corrective Action Process – Suppliers' management systems shall include the process for adequate and timely corrective actions for internally or externally identified deficiencies.
12. Documentation and Records – Suppliers shall create and maintain records and documents related to the regulatory compliance and conformity to company requirements in line with the confidentiality principles protecting privacy.
13. Supply Chain Management – Vertiv expects its suppliers to use their best efforts to communicate and extend the principles embodied in this Supplier Code of Conduct to their suppliers and agents that are engaged in the production, supply and support of products or services for Vertiv and monitor suppliers' compliance to this Code.