

Code of Conduct Policy

The purpose of this Code of Conduct is to ensure that all employees, contractors, and suppliers act with integrity, transparency, and ethical responsibility in all business dealings. HVT is committed to conducting business in a manner that respects human rights, complies with applicable laws and regulations, and fosters trust and accountability across our supply chain.

Applicability

This Code applies to all employees, contractors, representatives, suppliers, vendors, and partners engaged with HVT. Everyone is expected to uphold these standards throughout their relationship with the company.

Ethical Standards

HVT is committed to conducting business with honesty, fairness, and respect. Compliance with all applicable laws and regulations is mandatory, including anti-corruption statutes, labor laws, and environmental standards. All personnel are expected to act ethically and responsibly, supporting a safe, respectful, and inclusive work environment.

Data Integrity and Documentation Accuracy

Employees, contractors, and suppliers must protect confidential, proprietary, and personal information and ensure all records, reports, communications, and technical documentation are complete, accurate, and truthful. Altering, omitting, or falsifying data, test results, or calibration records is strictly prohibited. Proper information management and documentation help maintain trust, ensure compliance, and support the development of safe and reliable products and services.

IT and Technology Use

Company technology, systems, and devices must be used responsibly, ethically, and in compliance with applicable laws. Employees, contractors, and suppliers should not use company systems for unauthorized purposes or access, share, or store information in ways that violate HVT policies.

Cybersecurity and Secure Communications

Employees, contractors, and suppliers must protect HVT systems, networks, and data from unauthorized access, disclosure, or misuse. Passwords, accounts, and access privileges must be handled responsibly. All communications, internal, external, and electronic, must be professional and secure. Any suspected security incidents or breaches must be reported immediately to management.

Artificial Intelligence (AI) Usage

The use of AI tools must support ethical conduct, protect confidential information, and uphold HVT standards for accuracy and professionalism. Key requirements:

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- Confidentiality: Do not input sensitive or confidential information into external AI systems unless approved by HVT.
- Accuracy and Oversight: Review AI-generated content for correctness and compliance; AI outputs may assist but do not replace human judgment.
- Compliance and Fair Use: Use AI in accordance with all applicable laws, including data protection and intellectual property.
- No Misrepresentation: Do not present AI-assisted work as independently verified unless validated.
- Ethical Use: Avoid using AI for deceptive, discriminatory, or unethical purposes.

Misuse of AI tools, including the mishandling of sensitive data or reliance on unverified content for critical decisions, may result in corrective or disciplinary action.

Intellectual Property

Respect for HVT's and others' intellectual property, including patents, trademarks, copyrights, and trade secrets, is required. Proprietary information should only be used for legitimate business purposes and in compliance with applicable laws and company policies.

Conflicts of Interest

Employees, contractors, and suppliers must avoid situations where personal interests could interfere, or appear to interfere, with the impartial performance of their duties. Any potential conflicts, including outside employment, financial interests, gifts, or relationships that may influence decisions, should be disclosed to management promptly. Transparency and proactive disclosure help maintain trust, fairness, and integrity in all business activities.

Compliance with Laws & Regulations

All employees, contractors, and suppliers must comply with applicable local, national, and international laws and regulations in the performance of their duties. This includes, but is not limited to, labor, trade, environmental, anti-corruption, and safety laws. Adhering to legal requirements ensures integrity, protects the company and its stakeholders, and fosters trust in all business operations.

Export Controls, Sanctions, and Trade Compliance

HVT products, technologies, and technical information may be subject to U.S. and international export control laws and trade restrictions. Employees, contractors, and suppliers must comply when handling, transferring, shipping, or discussing controlled items or data.

- Do not export, re-export, transfer, or disclose products, components, software, or technical information without proper authorization.
- Avoid engaging with restricted countries, sanctioned parties, or denied individuals.

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- Do not circumvent licensing requirements or applicable trade regulations.
- If unsure about classification, licensing, or customer eligibility, consult management before proceeding.
- Noncompliance can result in severe legal penalties for individuals and the company.

Strict adherence protects HVT's global operations and ensures responsible distribution.

Supplier Code of Conduct Reliance

HVT relies on its suppliers' commitment to ethical conduct as a cornerstone of supply chain management. Suppliers must maintain their own Code of Conduct or equivalent guidelines aligned with internationally recognized standards and comply with all applicable laws, including labor, safety, environmental, and anti-corruption regulations.

Suppliers must cooperate with HVT by providing evidence of ethical practices, maintaining traceability, and promptly reporting any suspected noncompliance, counterfeit, or quality issues. HVT may audit suppliers, request additional documentation, or terminate relationships if standards are not met.

Anti-Counterfeit and Supply Chain Integrity

All components, products, and materials must be authentic and sourced from authorized channels. Counterfeit, unverified, or substandard parts must never be used. Suppliers are expected to maintain traceability and report suspected counterfeit items immediately. For detailed requirements, refer to *HVT's Counterfeit Avoidance Policy*.

Anti-Corruption, Bribery, and Gifts

HVT maintains a strict zero-tolerance policy toward corruption, bribery, and unethical inducements. Employees, contractors, and suppliers must:

- Not offer, solicit, or accept any form of improper payment, gift, or benefit intended to influence business decisions or gain an unfair advantage.
- All gifts, entertainment, or benefits offered or received must be reasonable, transparent, and compliant with applicable laws.
- Suspected violations must be reported through the Reporting and Whistleblowing procedures below.

Fairness, Respect, Diversity, and Inclusion

HVT upholds internationally recognized human rights and strictly rejects child labor, forced labor, or any form of exploitation. All personnel must be treated fairly and respectfully, without discrimination or harassment based on race, religion, sexual orientation, nationality, origin, political or trade union

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activities, age, gender, disability, or any other protected characteristic. HVT fosters an inclusive environment where all individuals can contribute fully and thrive.

Health, Safety, and Environmental Responsibility

HVT prioritizes the safety, well-being, and environmental responsibility of employees, contractors, suppliers, and customers. All personnel must:

- Follow occupational safety procedures and report hazards or safety shortcomings promptly, in accordance with *HVT's Environmental Health & Safety Policy*.
- Conduct work, including handling, transporting, or disposing of products, components, or materials (such as batteries, electronic components, and hazardous items), in compliance with all applicable environmental laws and regulations.
- Segregate, recycle, and safely dispose of hazardous and non-hazardous materials in accordance with established procedures. Report spills, improper disposal, or unsafe handling immediately.
- Practice foresight, care, and safety-conscious behavior to protect themselves, others, and the environment.

Responsible management of safety and environmental risks helps HVT maintain a safe workplace, protect the environment, reduce operational risk, and ensure compliance with laws and regulations.

Laboratory and Onsite Safety

Employees, contractors, and suppliers must follow all procedures and safety protocols when performing lab work, calibrations, or onsite installations. Tests and calibrations must be conducted honestly and accurately, without falsifying results or bypassing procedures. All hazards must be reported immediately, and the safety of personnel, customers, and equipment must be prioritized at all times.

Energy Management

Reducing energy consumption and promoting operational efficiency are priorities across all HVT operations. Employees and suppliers should follow best practices, such as operating equipment responsibly, turning off unused devices, and supporting energy-saving initiatives. These actions help lower environmental impact, reduce costs, and foster a sustainable workplace.

Quality and Product Safety

HVT is committed to delivering safe, reliable, and compliant products. Employees, contractors, and suppliers must follow established procedures, maintain high-quality standards, and report any defects, safety concerns, or noncompliance immediately. Everyone shares responsibility for protecting customers, users, and the integrity of HVT products.

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Reporting and Whistleblowing

Employees, contractors, and suppliers are encouraged to report suspected violations of this Code of Conduct promptly and in good faith. Reports may be made through management, designated compliance officers, or anonymous channels. HVT investigates all concerns fairly, confidentially, and promptly. Individuals who raise concerns in good faith are protected from retaliation.

Monitoring and Enforcement

Compliance with this Code is monitored through internal audits, supplier reviews, and compliance checks. Violations may result in disciplinary action, up to and including termination for employees, or corrective measures for suppliers. HVT is committed to ensuring ethical practices are upheld throughout the organization and supply chain.

Acknowledgment and Compliance

All employees are expected to understand this Code and demonstrate knowledge through periodic assessments, such as annual quizzes. Suppliers must comply as part of contractual obligations and maintain their own aligned Code of Conduct. Completion of training and adherence to these standards constitutes acknowledgment of this policy.

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