



Supplier Code of Conduct

Transcat, Inc., itself and its subsidiaries, value its supplier relationships that are an integral part of our success and impact in the life sciences, aerospace and defense sectors. We are committed to holding our suppliers to the highest standards regarding performance and business conduct. We not only hold our employees but also its' suppliers to the highest of legal, ethical, environmental and social standards within our own business and our suppliers.

We are continuing to enhance the way in which suppliers are engaged to improve the way in which we and our suppliers handle important issues. Our Supplier Code of Conduct outlines the expectations and standards for our supplier's business conduct. This may be found on our website. Any deviations from or violations of the Supplier Code of Conduct are considered unacceptable and suppliers should feel that issues or concerns that are raised will be handled without any retaliation or discrimination.

This Supplier Code of Conduct sets forth the minimum standards of business conduct that we expect from all of our suppliers:

- 1. Compliance with laws:** Suppliers shall comply fully with all laws and regulations applicable to them.
- 2. Environmental sustainability:** Transcat expects its suppliers to demonstrate a clear understanding of the environmental risks, impacts and responsibilities associated with the products and services they provide:
 - 2.1 Suppliers should have in place an effective environmental policy, statement or program to mitigate environmental risks, the implementation of which should be evident throughout all levels of the company.
 - 2.2 Suppliers should have processes in place to ensure that their operations conform to all applicable environmental legislation. All required environmental permits, approvals and registrations are to be obtained, maintained and complied with in accordance with the conditions and requirements defined therein.
 - 2.3 Environmental performance should be measured, monitored and reviewed regularly. The supplier should endeavor to make continuous improvements in environmental performance through practicable measures and employ leading practices where possible.
 - 2.4 Suppliers should make practical efforts to minimize the use of energy, water and raw materials. Where possible, these should be renewable or sustainably sourced.
 - 2.5 Emissions to air that are likely to cause pollution or contribute to climate change should be monitored, controlled and minimized where possible.
 - 2.6 Suppliers shall make practical efforts to eliminate or reduce levels of generated waste and should reuse and recycle waste materials wherever possible. The handling, storage, movement, treatment and disposal of all waste must be carried out in accordance with applicable regulations and in an environmentally responsible manner.
 - 2.7 Suppliers should consider the environmental credentials and performance of vendors within their own supply chain and require them to operate to a minimum set of standards.



2.8 Products and services provided to Transcat should include options that offer reduced environmental impact by utilizing environmentally sound technologies, processes and sustainable materials, etc.

3. Human rights and social sustainability: Policies should be in place to confirm the supplier's commitments, and improvement programs should be in place where relevant:

3.1 Freedom from forced labor, bonded labor and human trafficking:

- All employment shall be freely chosen by the worker. Workers shall be free to leave their employment at any time (subject to reasonable and paid notice periods) and shall not be subject to any coercion or restriction through, for example, the holding of original copies of employee passports, identity documents or monetary deposits.
- There shall not be any use of bonded labor. Work must be undertaken for fair compensation and must not be undertaken to repay a debt incurred (i.e., as a result of deceptive recruiting practices).

3.2 Recruitment agencies: Where recruitment agencies/brokers are used by the supplier, appropriate due diligence and ongoing management must be undertaken to ensure that risks of worker exploitation, such as debt bondage, are effectively mitigated. Reasonable evidence of these activities is to be available to Transcat upon request, within a reasonable notice period.

3.3 Child labor: Suppliers should adhere to local laws relating to the minimum working age and not engage in the employment of child labor, directly or indirectly. According to the International Labour Organization (ILO) minimum age convention (C138) of 1973, child labor refers to any work performed by children under the age of 12, non-light work done by children aged 12—14 and hazardous work done by children aged 15—17. Suppliers should also ensure that working hours for those of school age are not exceeding the maximum hours on a school day. In cases where child labor is found, programs should be in place to support the child into education.

3.4 Wages and benefits: At a minimum, the legal minimum wage standard must be adhered to across the entire workforce, employees should receive clear information on their wages, and unfair deductions from wages as a disciplinary measure are not permitted.

3.5 Working hours: Working hours must be limited according to national or local law, including breaks. Overtime should be voluntary, should not replace regular employment and must be fairly compensated.

3.6 Health and safety and working conditions: A safe and hygienic working environment should be provided with an awareness of any industry-specific hazards. Relevant training should be provided to employees.

3.7 Regular employment: All employees should be provided with a written employment contract setting out their terms and conditions in accordance with the local relevant legal jurisdiction. We expect all employment and the termination of employment to be carried out in a fair manner.

3.8 No harsh or inhumane treatment: Abuse, threat of abuse, and sexual or other harassment or intimidation should be prohibited by suppliers. Suppliers shall make available to all workers within their operations and supply chain a mechanism for which grievances relating to labor practices can be anonymously raised, without fear of retribution. Suppliers shall investigate and take appropriate action to remedy all grievances raised.

3.9 Subcontracting: Where authorized subcontracting is used to support the execution of services for Transcat, the supplier shall confirm that the subcontractor meets the minimum expectations set out in Section 3 of this document through the following controls:

- Supplier shall take necessary steps to obtain and maintain visibility over labor rights risks within the operations and supply chains of subcontractors.
- Supplier shall attain the right to audit over subcontractor operations.
- Records of audits undertaken of subcontractors shall be available on request.
- Supplier shall have written agreements in place with subcontractors to ensure that any further subcontracting by the subcontractor company (a) is authorized and (b) meets the standards set out in this document.

3.10 Right to audit: Suppliers shall attain the right to audit over their suppliers to assess the working conditions and extent to which workers' labor rights are being upheld. Records of audits undertaken of the suppliers' supply chain shall be available on request.

3.11 Incident response: Suppliers shall take the following actions, at a minimum, when an incident of forced labor, bonded labor, human trafficking or child labor is identified:

- Disclosing the incident/high risk to relevant authorities
- Disclosing the incident/high risk to Transcat
- Taking appropriate actions to remedy the incident

3.12 Demonstration of reasonable modern slavery due diligence: Transcat expects that our suppliers will maintain an active view on the inherent risk of modern slavery in their supply chain (this includes third-party certifications in relation to human rights and social compliance standards). Among other modes of inquiry, we would expect this to include engaging human rights specialists to perform validation audits of high-risk suppliers on an intermittent, but no less than annual, basis.

In addition to the above minimum requirements, the supplier shall define a minimum standard of human rights that applies across all jurisdictions and demonstrate how compliance to this is encouraged and observed. Such standards should refer to, at a minimum, the UN Guiding Principles on Business and Human Rights.

4. Diversity and inclusiveness: Our sourcing decisions, contracts and management of supplier relationships will reflect and promote the principles of equal opportunities in that Transcat will seek to ensure that suppliers do not victimize, harass or discriminate against any employee or party to the contract due to their sex, gender identity/expression, marital or civil partnership status, race, ethnicity or national origin, disability, religion, sexual orientation, age or part-time status. Suppliers will be required to meet the requirements of any applicable discrimination legislation. Our suppliers will be treated fairly and equally during the tendering and purchasing process, with decisions made on the basis of clear selection criteria:

4.1 Transcat expects suppliers to have a policy in place to consider usability by, and inclusion of, individuals with disabilities when designing products and/or delivering services to Transcat. As part of the policy, there are accessibility standards and/or processes in place that conform to disability guidelines when suppliers are designing products and/or delivering services.

4.2 Transcat expects suppliers to have a policy that explicitly bans discrimination/bullying and harassment based on sexual orientation, race, gender or gender identity/expression. In addition, suppliers are also encouraged to have evidence of diversity and inclusiveness training that is inclusive



of sexual orientation and gender identity/expression.

4.3 Transcat's objective is to identify, develop and utilize certified diverse businesses (defined below) that can enhance our competitive advantage and provide innovative and cost-effective products and services for us and our clients. It is our expectation that all suppliers use their best efforts themselves to procure diverse businesses to compete for goods and services to become preferred suppliers to the supplier and/or as its subcontractor(s). In accordance with the terms of its agreement with an Transcat entity, suppliers commit to comply with all relevant regulatory agency requirements, as well as with any local diversity regulations and programs.

4.4 For the purposes of this Supplier Code of Conduct, a "diverse business" is a company that is certified to be at least 51%-owned, -operated and -controlled by one or more minority, woman, LGBT+ person, person with a disability, veteran, service-disabled veteran, or aboriginal or indigenous person. In addition, historically underutilized business and social enterprises as defined by the local country will be included in the diverse-business classification.

4.5 It is our commitment that diverse business enterprises shall have equal opportunity to compete for all goods and services to become preferred suppliers and/or subcontractor(s) for the organization. Transcat is committed to the development and growth of diverse business enterprises to build a better working world and to expand networks to build trusted and enriched relationships.

4.6 Transcat expects suppliers to have equivalent policies to promote diversity in their supply chains and purchase from diverse businesses. Suppliers agree to make a reasonable effort to utilize diverse suppliers and provide evidence to Transcat upon request.

5. Ethics: The highest standard of integrity is expected in all of our business dealings. Any and all forms of corruption, extortion, bribery (including facilitation payments), and embezzlement are strictly prohibited and may result in immediate termination and legal action:

5.1 Suppliers will not offer or provide Transcat or anything of value to any person if the circumstances indicate that it is probable that all or part of Transcat or other thing of value is being given to another individual or entity to influence official action or to obtain a business advantage.

5.2 Suppliers are expected to understand relevant Transcat gift and hospitality policies before offering or providing Transcat personnel with any gift and/or business entertainment. Gifts or entertainment should never be offered to Transcat personnel or representatives under circumstances that create the appearance of impropriety.

5.3 Suppliers must comply with all applicable trade control laws and regulations in the import, export, re-export or transfer of goods and services (including software and technology). All invoices and any customs or similar documentation submitted to Transcat or governmental authorities in connection with transactions involving Transcat must accurately describe the goods and services provided and the price thereof.

5.4 Suppliers shall not share or exchange any prices, costs or other competitive information, or undertaking of any collusive conduct with any other third party to Transcat with respect to any proposed, pending or current Transcat procurement.

5.5 Suppliers will use only subcontractors or other third parties who comply with all applicable laws and regulations, and who adhere to the same (minimum) standards set forth in this guide.

6. Monitoring: Transcat may conduct annual compliance surveys to confirm compliance with this Supplier Code of Conduct. However, Transcat expects that suppliers will actively audit and



monitor their day-to-day management processes with respect to the Transcat's Supplier Code of Conduct and provide evidence to Transcat upon request.

About Transcat

Transcat, Inc. is a leading provider of accredited calibration, reliability, maintenance optimization, quality and compliance, validation, Computerized Maintenance Management System (CMMS), and pipette services. The Company is focused on providing best-in-class services and products to highly regulated industries, particularly the Life Science industry, which includes pharmaceutical, biotechnology, medical device, and other FDA-regulated businesses, as well as aerospace and defense, and energy and utilities. Transcat provides periodic on-site services, mobile calibration services, pickup and delivery, in-house services at its 24 Calibration Service Centers strategically located across the United States, Puerto Rico, Canada, and Ireland. In addition, Transcat operates calibration labs in 21 imbedded customer-site locations. The breadth and depth of measurement parameters addressed by Transcat's ISO/IEC 17025 scopes of accreditation are believed to be the best in the industry.

Transcat also operates as a leading value-added distributor that markets, sells and rents new and used national and proprietary brand instruments to customers primarily in North America. The Company believes its combined Service and Distribution segment offerings, experience, technical expertise, and integrity create a unique and compelling value proposition for its customers.