

SUPPLIER CODE OF CONDUCT

Hardinge Inc. is committed to excellence, and we recognize that excellence cannot be achieved without the cooperation and support of high quality, cost effective suppliers. As an active member of the Global Community and supply chain, we recognize the responsibilities of ourselves and our customers extend beyond our own operations into those of our suppliers, contractors, subcontractors, and consultants (collectively “Suppliers”). It is our focus to strive to ensure that we are transparent and act in a manner according to appropriate business standards and expect our Suppliers to do the same.

As a citizen of the global supply chain, Hardinge is committed to proper business conduct and sustainability as defined and embodied in the Hardinge Code of Ethics and its supporting policies. Hardinge leadership and employees expect and encourage its/their Suppliers to adhere to these same principles which require a commitment to act with the highest standards of integrity and in an ethically and environmentally responsible manner.

To this end, we have developed the Hardinge Supplier Code of Conduct (Supplier Code), which integrates into it many relevant aspects of the Hardinge Code of Ethics, leaving out provisions that are not necessarily relevant to Suppliers but more relevant to Hardinge employees. We require that all Suppliers, at a minimum, comply with the Supplier Code.

Non-compliance with the Supplier Code may not only result in Supplier disqualification for future business with Hardinge, but serve as a ground to terminate, without Hardinge liability, any pending Hardinge purchase order or contract with a Supplier.

The following sets forth the provisions of the Supplier Code.

Governance/Compliance

All Hardinge Suppliers shall:

- Ensure their operations and the products and/or services supplied to Hardinge comply with Hardinge specifications and all international, national, local and other applicable laws and regulations.
- Not offer or provide, directly or indirectly, anything of value, including cash, gifts, entertainment, bribes or kickbacks to any Hardinge employee, representative, customer, or any government official, in connection with any Hardinge business or sourcing activity.
- Not engage in any activity that shall create a conflict of interest with its obligations to Hardinge, and Supplier(s) shall report any conflicts of interest that come to its/their attention.
- Safeguard, respect and not use any non-public Hardinge (or other) confidential information for personal gain or share with others for their gain.
- Respect and comply with business gifts and entertainment policies for Suppliers established by Hardinge.

Trade Compliance

All Hardinge Suppliers shall:

- Understand and follow applicable international trade control and customs laws and regulations, including but not limited to REACH, RoHS, Conflict Minerals and California Proposition 65 regulations.
- Never participate in boycotts or other restrictive trade practices prohibited or penalized under US or other applicable laws.
- Make sure all transactions are screened for embargoed countries/restricted parties in accordance with applicable export/import requirements. Hardinge utilizes RPL (Restricted Parties Screening Lists) as the tool to screen all exports.

Commitment to Management/Business Practices

All Hardinge Suppliers shall:

- Design, implement and maintain effective management systems, with appropriate objectives and targets, to ensure (a) compliance with applicable laws, regulations and any Hardinge requirements related to Supplier's operations, products and services; (b) conformance with the Supplier Code; and (c) identification and mitigation of operational risks related to the areas covered by the Supplier Code.
- Employ fair business practices and comply with applicable competition and antitrust laws.
- Require its suppliers who provide goods or services that support Hardinge business to adhere to the Supplier Code, or any similar code required to be complied with by Hardinge Suppliers, in respect of any Hardinge customer business.
- Keep timely, accurate and complete books and records in accordance with applicable standards, laws and regulations, and any Hardinge requirements.

Commitment to Employees

All Hardinge Suppliers shall:

- Not use forced, bonded or indentured labor or involuntary prison labor.
- Not use or employ workers younger than the applicable minimum age.
- Not permit at its facilities or that of its suppliers any actual or threat of harsh and inhumane treatment, including any sexual or other harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, or permit any retaliation against those who report such acts.
- Engage in fair and anti-discriminatory employment practices in the hiring, payment, benefits, advancement, termination and retirement of its employees as provided or protected by applicable law.
- Recognize and respect any rights of workers to exercise lawful rights of free association for the purpose of collective bargaining as provided by applicable law or regulation.
- Observe applicable laws and regulations governing wages and hours.
- Comply with applicable data protection and data privacy laws.
- Maintain emergency response (including evacuation) procedures, worker training and drills, adequate exit facilities and business recovery plans.



- Have and enforce a written policy prohibiting the use of drugs and alcohol in the workplace.
- Provide adequate measures at its facilities to address the security of employees, information, IT assets and business continuity.
- Provide its workers a clean, safe and healthy work environment in compliance with all applicable laws, regulations, standards and permits for workplace health and safety and to provide appropriate training in furtherance thereof.

Commitment to the Environment

All Hardinge Suppliers shall:

- Not permit discharge or emissions to the environment in violation of law, issued/required permits, or in a way that would otherwise have an adverse impact on the environment.
- Operate in compliance with all applicable environmental laws, regulations, standards and permits related to its locations, operations, and products and services.
- Strive for continual improvement in the reduction of use of hazardous materials in their products and/or services.
- Strive to reduce or eliminate waste, including water and energy, at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

Any Supplier or employee of a Supplier who becomes aware of any existing or potential breach of the Supplier Code shall promptly notify the Hardinge Director- Global Sourcing at Sriram.Duvvuri@Hardinge.com.

Hardinge may ask Suppliers to provide evidence of compliance with the Supplier Code and to report to Hardinge any instances of non-compliance. In addition, Hardinge reserves the right to audit Suppliers for compliance to the Supplier Code.

Supplier Signature:

Full Name Of the Signatory:

Send a signed copy to: Sriram.Duvvuri@Hardinge.com & Bari.Zach@hardinge.com