

Supplier Code of Conduct



Contents

Vicor and Supplier Code

Obligations to Vicor

Vicor Standards

Human Rights

Health and Safety

Vicor and Supplier Code

Introduction 4
 Vicor Values 4
 Questions & Concerns 5

Obligations to Vicor

Confidential Information 7
 Vicor’s Physical Property 7
 Audits and Transparency 7

Vicor Standards

Introduction 9
 The Environment 9
 Corruption 10
 Conflicts of Interest
 Bribery
 Fraud
 Insider Trading
 Dealing with Governments
 Trade 12
 U.S. Rules
 Counterfeits
 Management Commitment 14
 Cybersecurity and Data Privacy 14

Human Rights

Discrimination and Harassment 16
 Protecting Young Workers 16
 Free Employment 17
 Other Labor Rights 18
 Fair Pay
 Work Hours
 Freedom of Association and Collective Bargaining
 Medical exams
 Conflict Minerals 19

Health and Safety

Security 21
 Illness and Injury 21
 Health Hazards
 Alcohol & Drugs 21
 Other Inquiries 22

Vicor and Supplier Code

Vicor and Supplier Code

Obligations to Vicor

Vicor Standards

Human Rights

Health and Safety



Vicor and Supplier Code

Introduction

Vicor Corporation designs, manufactures and markets innovative, high-performance modular power components, from bricks to semiconductor-centric solutions, to enable customers to efficiently convert and manage power from the wall plug to the point-of-load.

This Supplier and Partner Code of Conduct (this “Code”) is an ethical baseline that applies to the supplier and partner organizations of Vicor Corporation and its subsidiaries (collectively, “Vicor” or the “Company”).

A supplier provides Vicor with (a) good(s) or service(s) under a contract; the Company’s relationships with its partner organizations are broader, less formal, and emphasize a collective responsibility.

When a supplier or partner violates this Code, Vicor will implement corrective action plan; lack of improvement thereafter can result in further action, up to and including termination of business relationship.

To ensure compliance with this Code, Vicor encourages that each supplier or partner follow the Company’s example and establish and maintain its own code of business conduct and compliance function.

Any time this Code refers to a “Department” the Code is referring to a department within Vicor.

This Code is accessible through the Company’s website — or through Vicor’s Procurement Department (upon request).

Vicor Values

The Company was built on and unconditionally follows five cardinal principles. In turn, Vicor encourages its supplier and partner organizations to mirror these principles:

Accountability, or ensuring that oversight travels up and down the chain of command.

Commitment, as coworkers are most productive when healthily invested in their work and each-other.

Respect, which upholds dignity and underlies constructive feedback.

Reward, is the idea that people deserve and are motivated by positive consequences for ethical actions.

Safety, which is the identification and minimization of risks.

Vicor and Supplier Code

Obligations to Vicor

Vicor Standards

Human Rights

Health and Safety

Vicor and Supplier Code

Questions or Concerns

Vicor and Supplier Code

Obligations to Vicor

Vicor Standards

Human Rights

Health and Safety

If anyone suspects a violation of this Code, then that person should contact an appropriate authority within their organization.

However, there are some instances where (a) department(s) within Vicor should instead be contacted — for instance, situations when an informant feels that their company will not (or cannot) handle a complaint effectively.

In such situations, this Code either instructs workers to contact the government or Vicor.

When it is the latter, the Company can be reached through its the Lighthouse Hotline, which can be accessed via:

- reports@lighthouse-services.com
- English-speaking U.S. and Canada: 877-222-1978
- Spanish-speaking U.S. and Canada: 800-216-1288

- French-speaking Canada: 855-725-0002
- Spanish-speaking Mexico: 01-800-681-5340
- All other countries: 800-603-2869
- Facsimile, or fax, at (215) 689-3885
- An app for anonymous reporting — this app can be activated using the keyword, “vicr” and can be downloaded using this link: [www.lighthouse-services.com/documents/Using the Lighthouse Anonymous Reporting App.docx](http://www.lighthouse-services.com/documents/Using%20the%20Lighthouse%20Anonymous%20Reporting%20App.docx).

In order to use the worldwide hotline, an informant must use the right country-specific access code, and follow the instructions, detailed in this link: [www.lighthouse-services.com/documentlink/International Toll-free Hotline Access Instructions.pdf](http://www.lighthouse-services.com/documentlink/International%20Toll-free%20Hotline%20Access%20Instructions.pdf).

If someone decides to report using email or fax, they must include the Company’s name in their report.

If misconduct or a violation involves a data privacy-related offense, the Company can be notified via privacy@vicr.com.

No Retaliation

Finally, since the Company prohibits retaliation against any Vicor worker who reports a violation of the Company’s Code of Business Conduct, other company policies, and the law, Vicor expects each supplier and partner to enforce an equivalent policy regarding this Code and other mandates such as internal policies and laws.

Obligations to Vicor

Vicor and Supplier Code

Obligations to Vicor

Vicor Standards

Human Rights

Health and Safety



Obligations to Vicor

Vicor and Supplier Code

Obligations to Vicor

Vicor Standards

Human Rights

Health and Safety

Confidential Information

Disclosing the Company's confidential information or intellectual property can lead to immense financial damage for Vicor – and can also be a civil or even criminal offense.

Therefore, everyone must take proper care to protect sensitive information, including confidential, proprietary and personal information, of the Company – and should not use such information for any purpose other than the business purpose(s) for which it was provided. The information must also not be disclosed to others, unless the owner of the information authorized a disclosure in writing beforehand.

Vicor's Physical Property



If anyone is given access to any of Vicor's tangible resources, like a computer in the Company's possession, then that person must follow all applicable cybersecurity and data privacy regulations while using the resource.

Additionally, no-one granted access to the Company's tangible resources should utilize the asset for unauthorized purposes.

Audits and Transparency

Vicor and any government entity with applicable jurisdiction reserve the right to audit any supplier or partner for compliance with regulations such as conflict minerals, sanctions, and forced labor laws.

Therefore, suppliers and partners must collect, organize, and disclose certain kinds of information in a way that follows all applicable laws.

Vicor Standards

Vicor and Supplier Code

Obligations to Vicor

Vicor Standards

Human Rights

Health and Safety



Vicor Standards

Introduction

Vicor expects that each of its suppliers and partners unconditionally follow the law and this supplier code. However, when the law or a supplier's or partner's contract with the Company conflicts with this Code, then the law or the contract should take precedence.

Vicor and Supplier Code

Obligations to Vicor

Vicor Standards

Human Rights

Health and Safety

The Environment

An established focus on energy efficiency drives a Company-wide emphasis on preserving resources and abating pollution in the supply chain.

Therefore, all of Vicor's suppliers and partners should internally outline and educate to their workforce a program that covers:

- Handling and disposing of hazardous waste and other pollutants,
- Preventing the contamination of storm-water runoff,
- And recording, reporting, and analyzing the usage of natural resources — as well as observing and analyzing how efficient their use is.



Vicor Standards

Corruption

Conflicts of Interest

A conflict of interest, or conflict, happens when someone's personal interest interferes with their ability to help fulfill their organization's obligations to Vicor. As a result, conflicts, and even the appearance of any conflict, should be avoided by Vicor's suppliers and partners.

Yet the conditions that define a conflict are variable. Therefore, a situation that has not yet presented itself as a conflict could in the future.

The following areas are typically where conflicts of interest occur:

- Business opportunities cultivated through a contract with Vicor,
- Donations,
- Gifts, entertainment, and other business courtesies,
- Inventions or developments,
- Personal investments,
- Relationships with friends, family, or other employees at Vicor,
- Use of Vicor assets or know-how for personal reasons or personal gain.

Vicor Standards

Corruption

Bribery

Since Vicor strictly prohibits each of its workers from being a party to a bribe, meaning (a) money, gift(s), or service(s) given to someone to improperly influence how they do their job, the Company expects its suppliers and partners to adopt and enforce an equivalent policy and follow all applicable anti-bribery and other anti-corruption laws — including the U.S. Foreign Corrupt Practices Act, or FCPA, which prohibits the bribery of government officials by anyone working in or for a company that does business in the U.S.

Fraud

Financial regulations around the world and in the U.S. are intended to protect consumers, sellers, and investors — whether they are individuals or companies.

And since Vicor unconditionally follows financial regulations, such as those that mandate accuracy, the Company expects its suppliers and partners to do the same.

Insider Trading

Any worker or officer of a supplier or partner is prohibited from considering the Company's nonpublic information when deciding whether to buy or sell Vicor securities.

Dealing with Governments

Interacting with a country's government or government officials generally triggers more scrutiny than dealing with its private sector organizations or citizens. As a result, supplier and partner organization must exercise caution when interacting, in any capacity or context, with government officials. Vicor strongly encourages its suppliers and partners to follow the Company's example and ban all gift-giving to government officials.

Vicor and Supplier Code

Obligations to Vicor

Vicor Standards

Human Rights

Health and Safety

Vicor Standards

Vicor and Supplier Code

Obligations to Vicor

Vicor Standards

Human Rights

Health and Safety

Trade

U.S. Rules

Abiding by trade and sanctions laws is, ultimately, the collective responsibility of all the workers at a supplier or partner, as violating these laws can open Vicor up to financial damage, legal liability, and reputation harm. Therefore, all the workers of Vicor's suppliers and partners should be familiar with at least the following.

The Bureau of Industry and Security, or BIS, of the U.S. Commerce Department ensures U.S. companies comply with federal export and treaty rules. Perhaps most importantly, the BIS enacts the Export Administration Regulations, or the EAR, to control international trade. BIS mandates that records of an item's (which can be material or immaterial) exportation and re-exportation activity be maintained at least five years after the most recent instance of such activity; "activity" is defined very broadly.

And the Office of Foreign Assets Control, or OFAC, of the U.S. Treasury Department applies U.S. trade and foreign policy goals and laws to foreign actors. To do this, OFAC sanctions individuals and organizations. For the most part, no organization that does business in the U.S. may do business with any sanctioned entity.

Global Rules

Vicor also encourages its suppliers and partners to comply with other applicable export and sanctions regulations globally.



Vicor Standards

Trade

Counterfeits

Giving or trading counterfeit items (knowingly or unknowingly) to Vicor is strictly prohibited.

Vicor expects that suppliers and partners unconditionally provide the Company with products and services of high quality.

Concerns regarding counterfeits should be reported to Vicor via the Lighthouse Hotline (whose contact information can be found in the “Questions or Concerns” section of this Code).

Alternatively, a government body with applicable jurisdiction can be contacted.

All suppliers and partners must, per applicable Vicor policies and laws:

- Detect and classify counterfeit items that are found in their supply chains,
- Record and catalogue details about all detected counterfeits,
- Notify the appropriate authorities regarding the findings.

Vicor Standards

Management Commitment Cybersecurity and Data Privacy

In order to enter into a contractual relationship with Vicor, a supplier or partner must provide the Company with a document, signed by (an) empowered official(s) at the supplier or partner, establishing:

- Processes for identifying and responding to violations of this Code,
- Risk management procedures,
- How a confidential internal reporting system for violations of this Code will be maintained,
- And how management will respond to reports about violations of this Code.

Vicor strives to comply with data privacy regulations globally and the Company, in turn, expects its supplier and partners to do the same. The Company also executes a stringent cybersecurity program and, therefore, encourages its suppliers and partners to take reasonable precautions to safeguard their own digital infrastructure.

Suppliers and partners should educate their workers to be vigilant for any possible digital security threats, as such dangers could potentially imperil the assets, privacy, and security of Vicor and its workers.

Suppliers and partners must safeguard Vicor's data in accordance with Service Organization Control, or SOC, II standards (such as SOC II disclosure provisions and the SOC II Trust Service Criteria, or TSC).



Human Rights

Vicor and Supplier Code

Obligations to Vicor

Vicor Standards

Human Rights

Health and Safety



Human Rights

Discrimination and Harassment

Vicor strictly prohibits discrimination, in hiring, promotion, and other activities, on the basis of race, color, sex, gender identity, religion, national origin, ancestry, age, sexual orientation, marital status, family-care status, veteran status, physical disability, medical condition, or any other characteristic covered by law. The Company expects each supplier and partner to adopt and enforce an equivalent policy.

The Company also prohibits its suppliers and partners from engaging in boycott discrimination, which means, in the context of this Code, a supplier or partner instructing Vicor to provide a good or service only to certain parties.

Furthermore, Vicor does not tolerate any kind of verbal, physical, or other harassment, including corporal punishment, on its premises or among its workers in any context. As with discrimination, the Company expects each supplier and partner to adopt and enforce an equivalent harassment policy.



Protecting Young Workers

Suppliers and partners should never hire children who are susceptible to workplace injury due to their age or are considered too young to work under applicable laws.

Additionally, suppliers and partners should ensure that workers under 18 years of age do not perform labor that is likely to jeopardize their health — for example, working night shifts and operating heavy machinery.

Vicor pays its apprentices, co-ops, and interns at least the minimum wage of the jurisdiction they labor in, and the Company expects its suppliers and partners to do the same.

Vicor and Supplier Code

Obligations to Vicor

Vicor Standards

Human Rights

Health and Safety

Human Rights

Free Employment

Vicor is committed to eliminating forced labor, a serious human rights violation, from its supply chain — in turn, the Company expects all its suppliers and partners to screen their own suppliers, partners, and other affiliates for human rights violations.

Additionally, the Company expects its suppliers and partners to never:

- Use forced labor,
- Unlawfully force workers to move between facilities,
- Unlawfully relocate workers,
- Fail to provide workers with adequate food, water, utilities, housing, and other resources, per applicable laws,
- Hold workers' IDs for longer than is absolutely necessary under applicable law,
- Use recruitment fees,
- Or try to indebt workers to them in any way.

Human Rights

Other Labor Rights

Fair Pay

All suppliers and partners must pay their workers, including apprentices, co-ops, and interns, at least the minimum wage of the applicable jurisdiction.

Work Hours

Suppliers and partners should always follow the labor laws of the jurisdictions where their employees work — including regulations regarding maximum work hours and minimum pay.

Freedom of Association and Collective Bargaining

All suppliers and partners must ensure that their workers' rights to collective bargaining and unionization are respected in accordance with all applicable laws.

Furthermore, workers should be able to speak freely and openly, at least to other employees of the supplier or partner or on said organization's premises, about working conditions, pay, and other workplace matters.

Medical Exams

No supplier or partner may subject its workers to illegal or otherwise frivolous medical exams, tests, or procedures, as defined by applicable Vicor policies and laws.



Human Rights

Conflict Minerals

The purchase of any “conflict mineral,” which, as defined under the 2010 U.S. Dodd-Frank Wall Street Reform Act, come from warfare, gang violence, or other human rights violations in certain African nations, could indirectly benefit insurgents, armed groups, or others engaged in human rights abuses.

Conflict minerals include:

- Cassiterite,
- Columbite-tantalite,
- Wolframite,
- Gold,
- Or their derivatives like tantalum, tin, or tungsten — together called 3TG.

Vicor does not tolerate the presence of conflict minerals in its supply chain. Therefore, the supply chain of any Vicor supplier and partner cannot

include metals sourced from a mine, smelter, or refiner participating in a minerals program not certified to be conflict-free.



Health and Safety

Vicor and Supplier Code

Obligations to Vicor

Vicor Standards

Human Rights

Health and Safety



Health and Safety

Security

All suppliers and partners should, per Vicor policies and laws, create and enforce security regimes that keep workers, visitors, and all others in their facilities safe.

If any worker of a supplier or partner obtains a visitor pass to a Vicor building from the Company, then that person is prohibited from admitting others in with it — barring:

- Appropriate authorization from the Company,
- Or an emergency that would warrant an exception.

Alcohol and Drugs

Vicor recommends that suppliers and partners comply with all applicable laws regarding how the possession, use, and influence of alcohol and other psychoactive substances relate to the workplace.

Illness and Injury

Vicor requires that each supplier and partner internally establish a system for preventing, identifying, keeping track of, and mitigating the effects of illness and injury — per applicable laws.

At a bare minimum, such a system should cover:

- How workers can confidentially report information,
- How to care for a worker who is sick or has been hurt,
- Corrective action,
- And facilitating someone's return to work.

Health Hazards

All suppliers and partners should outline and internally establish procedures addressing:

- Stressors like the force, posture, and repetition required to do a task,
- Other physical risks,
- Hazardous substances,
- And other dangers.

Finally, all workers must be given the right personal protective equipment, or PPE, for the tasks they are doing, per applicable laws.

Other Inquiries

Vicor and Supplier Code

Obligations to Vicor

Vicor Standards

Human Rights

Health and Safety

If the reader has any questions that were unanswered by this Code, they can contact the Compliance, Human Resources, or Legal Department(s).