



Specifications

OPEX Supply Chain Regulatory Requirements

Identifier	LEG-GLB-SPECS-1.0	Date	23 Oct 2026	Email	kwright@opex.com
Version	1.0	Contact	Katharina Wright	Phone	856 - 727 - 1100 x 5328

Table of Contents

Purpose 2

Definitions..... 2

Scope 2

Minimum Requirements 3

Regulatory References and Interpretations 3

Continuing Compliance 3

Notification Obligations 3

Flow-Down Requirements..... 4

Cooperation and Documentation 4

Record Retention 4

Regulatory and Compliance Requirements 4

Attachment A. Regulatory and Compliance Requirements 5

 1. Material and Substance 5

 2. Product Safety..... 7

 3. Environmental, Sustainability, and Responsible Sourcing..... 9

 4. Cybersecurity, Software, and Data Protection 10

 5. Trade and Business 11

 6. Ethical and Human Rights 12

Revisions..... 14

Purpose

This Specification establishes OPEX's minimum regulatory requirements applicable to Items supplied to OPEX.

Its purpose is to communicate OPEX's regulatory compliance expectations clearly and consistently to its global supply chain.

Definitions

Applicable Regulations – Any statute, regulation, directive, rule, mandatory standard, governmental requirement, or other legally binding regulatory requirement relating to the design, manufacture, testing, certification, labeling, packaging, supply, importation, exportation, sale, and / or use of the Items provided by the Supplier to or on behalf of OPEX.

Items – All materials, raw materials, substances, chemicals, parts, components, assemblies, equipment, machinery, hardware, firmware, software, artificial intelligence systems and models, packaging, labels, documentation, technical data, spare parts, consumables, products, services, deliverables, and other goods or services that a Supplier supplies to or on behalf of OPEX.

OPEX – OPEX Corporation and its subsidiaries and affiliates, as applicable.

Supplier – Any supplier, subcontractor, contract manufacturer, distributor, service provider, consultant, software provider, or other organization supplying Items to OPEX.

Scope

This Specification applies to all Suppliers providing Items to or on behalf of OPEX. The particular requirements of this Specification that apply to a Supplier or an Item may vary depending upon the nature of the Supplier and Items supplied to OPEX, the manner in which those Items are used within OPEX's business, and the Applicable Regulations relevant to those Items.

Suppliers of Items that may be incorporated into, supplied with, installed in, or otherwise used in connection with OPEX products should expect all or most of the requirements of this Specification to apply.

Suppliers providing services that are local in nature and not directly related to OPEX products (for example, building maintenance, landscaping, or construction services) will generally be subject only to those requirements of this Specification and Applicable Regulations relevant to their services and the applicable jurisdiction. Such providers are often subject to other national or federal, state or provincial, and local requirements not expressly referenced in this Specification, including licensing, permitting, workplace health and safety, environmental protection, building and fire codes, waste handling and disposal, employment and labor, and insurance or bonding requirements.

Each Supplier is responsible for performing its own due diligence and making its own inquiries to identify and determine the applicability of Applicable Regulations to the Items it supplies to OPEX. A Supplier shall not assume that an Applicable Regulation is inapplicable to such Items solely because the Supplier is located in, or an Item originates outside of, the jurisdiction(s) where that Applicable Regulation applies.

If a Supplier is uncertain whether a requirement of this Specification applies to an Item it supplies, the Supplier is expected to obtain written clarification from OPEX before supplying the Item to OPEX. Any such clarification by OPEX relates only to the requirements of this Specification and does not relieve the Supplier of its responsibility to identify and comply with other Applicable Regulations.

Minimum Requirements

This Specification establishes OPEX's minimum supply chain regulatory requirements and communicates OPEX's baseline regulatory expectations for Items supplied to OPEX.

This Specification is not intended to address each and every law, legal requirement, or other legal matter applicable to a Supplier or its relationship with OPEX. Its substantive focus is regulatory and supply-chain compliance relating to the Items supplied to OPEX. Thus, for example, other aspects of the parties' commercial and contractual relationship, including matters such as pricing, payment, invoicing, warranties, indemnification, limitation of liability, delivery terms, and termination, are addressed in purchase orders, terms and conditions, other agreements, and / or other documentation.

Nothing in this Specification relieves a Supplier of its responsibility to identify, understand, and comply with all Applicable Regulations and requirements relevant to the Items it supplies to OPEX.

Regulatory References and Interpretations

OPEX believes the regulatory references contained in this Specification to be accurate as of the date of issuance.

Unless OPEX expressly states otherwise in writing, any reference in this Specification to an Applicable Regulation includes applicable amendments, recodifications, replacement or successor requirements, implementing regulations, delegated acts, official guidance having legal effect, successor mandatory standards, and substantially equivalent regulatory requirements within the relevant jurisdiction.

Suppliers remain solely responsible for identifying, understanding, and complying with the most current versions of the Applicable Regulations.

The fact that this Specification may not yet have been updated following a change to any Applicable Regulation does not relieve a Supplier of its obligation to comply with the Applicable Regulation as amended or otherwise modified.

Continuing Compliance

Compliance with this Specification is a continuing obligation of each Supplier throughout the lifecycle of the Items it supplies to OPEX.

Suppliers shall ensure that the Items that they supply remain compliant with all Applicable Regulations and applicable requirements of this Specification and shall promptly notify OPEX in writing of any changes that may adversely affect such compliance.

Notification Obligations

Without limiting any other notification obligations that may arise under this Specification, Suppliers shall promptly notify OPEX in writing of any circumstance that could adversely affect the compliance, safety, security, availability, or lawful supply of the Items, including, without limitation, if:

- an Item no longer complies with Applicable Regulations or the applicable requirements of this Specification
- a change in Applicable Regulations affects an Item supplied to OPEX
- any declaration, certification, approval, authorization, exemption, or other compliance documentation relating to an Item becomes inaccurate, invalid, expired, suspended, or withdrawn
- a recall, corrective action, regulatory investigation, enforcement action, or similar regulatory measure affects an Item
- the export classification or applicable export authorization requirements of an Item change
- the Supplier becomes aware of an actively exploited vulnerability, severe cybersecurity incident, or other material cybersecurity incident affecting an Item

- any other circumstance that could reasonably affect the compliance, safety, security, availability, or lawful supply of the Items

Flow-Down Requirements

Suppliers shall ensure that their subcontractors, contract manufacturers, lower-tier suppliers, and other third parties whose products or services are incorporated into, integrated with, or otherwise form part of the Items supplied to OPEX comply with requirements contained in this Specification, as applicable.

Cooperation and Documentation

Suppliers shall provide OPEX in a timely manner with all information, documentation, declarations, certifications, technical data, and other materials required to be provided to OPEX by the Applicable Regulations.

In addition, upon OPEX's request, Suppliers shall provide OPEX in a timely manner with any additional information or documentation reasonably necessary for OPEX to ascertain, verify, demonstrate, maintain, or fulfill compliance with applicable regulatory, technical, quality, environmental, cybersecurity, contractual, or customer requirements relating to the Items.

Record Retention

Suppliers shall retain records reasonably necessary to demonstrate compliance with this Specification for a minimum of ten (10) years, unless a longer retention period is required by Applicable Regulation, in which case such longer retention period shall apply.

Suppliers shall make such records available to OPEX upon reasonable request.

Regulatory and Compliance Requirements

The specific regulatory and compliance requirements addressed by this Specification are set forth in *Attachment A*, which is attached hereto and incorporated herein.

Attachment A. Regulatory and Compliance Requirements

1. Material and Substance

Regulation / Legislation	Requirements	Information / Documentation
California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)	Evaluate supplied Items for potential exposures to chemicals listed under California Proposition 65. Where an Item may result in an exposure requiring a warning, provide sufficient information to determine and satisfy applicable warning requirements. Ensure compliance information reflects the current Proposition 65 chemical list and applicable warning requirements.	California Proposition 65 Declaration; identification of listed chemicals associated with the Item where relevant; available concentration and exposure information necessary to determine applicable warning requirements; applicable warning information; and any additional information or documentation reasonably necessary to support OPEX's compliance with California Proposition 65.
Persistent Organic Pollutants (POPs) – Regulation (EU) 2019/1021	Ensure that supplied Items comply with the prohibitions on the manufacturing, placing on the market, and use of substances listed in Annex I and the restrictions on substances listed in Annex II under Article 3, including applicable exemptions under Article 4.	POPs Declaration; identification and concentration information for regulated POPs where required; applicable exemption information; and any additional information or documentation reasonably necessary to support OPEX's compliance with the POPs Regulation.
Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) – Regulation (EC) No 1907/2006	Ensure that supplied Items comply with all applicable requirements of REACH, including registration and notification requirements for substances in articles under Article 7 where applicable, authorization for use of certain SVHCs under Annex XIV, restrictions on the manufacture, placing on the market, and use of certain dangerous substances, preparations, and articles under Annex XVII, communication obligations for Candidate List substances present in articles above 0.1% w/w under Article 33, and applicable supply chain communication requirements. NOTE: Ensure declarations reflect the current ECHA Candidate List and applicable Annex XVII restrictions.	REACH Declaration covering the current ECHA Candidate List and Annex XVII restrictions; applicable registration and notification information; SVHC disclosure above 0.1% w/w for communication obligations, including substance name, CAS number, concentration, and safe use information where required; applicable authorization information and exemptions; and any additional information or documentation reasonably necessary to support OPEX's compliance with REACH.

Restriction of Hazardous Substances (RoHS) – Directive 2011/65/EU	Ensure that Items subject to RoHS comply with the restrictions on hazardous substances and maximum concentration values in homogeneous materials under Article 4 and Annex II, including applicable exemptions under Annexes III and IV. Prepare and maintain the required technical documentation and carry out the applicable conformity assessment procedure. Draw up the EU Declaration of Conformity in accordance with Annex VI and affix the CE marking.	RoHS Declaration; EU Declaration of Conformity; applicable exemption information; substance and material compliance information; and any additional information or documentation reasonably necessary to support OPEX's compliance with RoHS.
Toxic Substances Control Act (TSCA) – Section 6(h), 15 U.S.C. § 2605(h)	Ensure that supplied Items comply with applicable prohibitions and restrictions on the manufacture, processing, distribution in commerce, and use of PBT chemicals under TSCA Section 6(h) and 40 CFR Part 751, Subpart E, including applicable concentration limits, exclusions, exemptions, and recordkeeping requirements.	TSCA (PBT) Declaration; identification and concentration information for regulated PBT chemicals where required; applicable exclusion or exemption information; and any additional information or documentation reasonably necessary to support OPEX's compliance with TSCA Section 6(h).
Waste Framework Directive (WFD) – Directive 2008/98/EC, Article 9(1)(i) – SCIP	Provide all information necessary to support SCIP notification requirements for supplied articles, as such or in complex objects (products), containing REACH Candidate List substances of very high concern (SVHCs) in a concentration above 0.1% weight by weight (w/w), including applicable information necessary to allow the safe use of the article.	Information required to complete the SCIP notification, including article identification; Candidate List substance identification; concentration range; material or mixture category; safe use information; and any additional information or documentation reasonably necessary to support OPEX's compliance with applicable SCIP notification requirements.

2. Product Safety

Regulation / Legislation	Requirements	Information / Documentation
Electromagnetic Compatibility Directive (EMC) – Directive 2014/30/EU	Ensure that Items subject to the EMC Directive comply with the applicable essential requirements of Annex I. Perform and document the required electromagnetic compatibility assessment, including an adequate analysis and assessment of the risks. Perform the applicable conformity assessment procedures in accordance with Article 14. Prepare and maintain the applicable technical documentation. Draw up the EU Declaration of Conformity in accordance with Annex IV. Affix the CE marking.	EU Declaration of Conformity; instructions and information necessary to ensure compliant installation, operation, and use; and, upon reasonable request, any additional information, documentation, or relevant technical documentation (including electromagnetic compatibility assessment information) reasonably necessary to support OPEX's conformity assessment, technical documentation, or other compliance obligations under the EMC Directive.
Low Voltage Directive (LVD) – Directive 2014/35/EU	Ensure that Items subject to the Low Voltage Directive comply with the applicable safety objectives of Annex I. Perform the applicable conformity assessment procedure in accordance with Annex III. Prepare and maintain the applicable technical documentation in accordance with Annex III, including an adequate analysis and assessment of the risks. Draw up the EU Declaration of Conformity in accordance with Annex IV. Affix the CE marking.	EU Declaration of Conformity; instructions and safety information necessary for the safe installation, operation, use, and maintenance of supplied Items; and, upon reasonable request, any additional information, documentation, or relevant technical documentation (including risk assessment information) reasonably necessary to support OPEX's conformity assessment, technical documentation, or other compliance obligations under the Low Voltage Directive.
Machinery Directive – Directive 2006/42/EC -applicable until 19 January 2027-	Ensure that supplied Items comply with all applicable essential health and safety requirements of Annex I. Carry out and maintain documented risk assessments. Apply the relevant conformity assessment procedure per Article 12. Prepare and maintain the applicable technical documentation in accordance with Annex VII, Part A for machinery, or Part B for partly completed machinery. Draw up the EC Declaration of Conformity in accordance with Annex II, Part 1, Section A, or Declaration of Incorporation in accordance with Annex II, Part 1, Section B, as applicable. Affix the CE marking in accordance with Annex III, where required. Draw up	EC Declaration of Conformity or Declaration of Incorporation; Operating Instructions or Assembly Instructions; and, upon reasonable request, any additional information, documentation, or relevant technical documentation (including risk assessment information) reasonably necessary to support OPEX's conformity assessment, technical documentation, integration of partly completed machinery, or other compliance obligations under the Machinery Directive.

	the Operating Instructions in accordance with Annex I, section 1.7.4, or Assembly Instructions in accordance with Annex VI, as applicable.	
Machinery Regulation – Regulation (EU) 2023/1230 -applicable from 20 January 2027-	Ensure that Items subject to the Machinery Regulation comply with all applicable essential health and safety requirements of Annex III. Carry out and maintain documented risk assessments. Apply the relevant conformity assessment procedure per Article 25. Prepare and maintain the applicable technical documentation in accordance with Annex IV, Part A for machinery and related products, or Part B for partly completed machinery. Draw up the EU Declaration of Conformity in accordance with Annex V, Part A, or EU Declaration of Incorporation in accordance with Annex V, Part B, as applicable. Affix the CE marking, where required. Draw up the Operating Instructions in accordance with Annex III, section 1.7.4, or Assembly Instructions in accordance with Annex XI, as applicable.	EU Declaration of Conformity or EU Declaration of Incorporation; Operating Instructions or Assembly Instructions; and, upon reasonable request, any additional information, documentation, or relevant technical documentation (including risk assessment information) reasonably necessary to support OPEX's conformity assessment, technical documentation, integration of partly completed machinery, or other compliance obligations under the Machinery Regulation.
Radio Equipment Directive (RED) – Directive 2014/53/EU	Ensure that Items subject to the Radio Equipment Directive comply with the applicable essential requirements of Article 3, including protection of health and safety, electromagnetic compatibility, and the effective and efficient use of radio spectrum. Where applicable, comply with the additional essential requirements of Article 3(3), including network protection, protection of personal data and privacy, protection from fraud, and other applicable delegated requirements. Perform the applicable conformity assessment procedures in accordance with Article 17. Prepare and maintain the applicable technical documentation in accordance with Annex V. Affix the CE marking. Draw up the EU Declaration of Conformity in accordance with Annex VI.	EU Declaration of Conformity; instructions, safety information, and required radio operating information; and, upon reasonable request, any additional information, documentation, or relevant technical documentation (including radio equipment assessment or cybersecurity documentation) reasonably necessary to support OPEX's conformity assessment, technical documentation, or other compliance obligations under the Radio Equipment Directive.

3. Environmental, Sustainability, and Responsible Sourcing

Regulation / Legislation	Requirements	Information / Documentation
Batteries Regulation – Regulation (EU) 2023/1542	Ensure that supplied batteries and products incorporating batteries comply with the applicable requirements of Articles 6 through 14, including substance restrictions, carbon footprint, recycled content, performance and durability, removability and replaceability, safety, labeling and marking, and information requirements. Perform the applicable conformity assessment procedure in accordance with Article 17. Prepare and maintain the technical documentation in accordance with Annex VIII. Draw up the EU Declaration of Conformity in accordance with Annex IX. Affix the CE marking.	EU Declaration of Conformity; applicable labeling and marking information; instructions and safety information; applicable battery composition, performance, durability, removability and replaceability, recycled content, carbon footprint, and digital battery passport information; and, upon reasonable request, any additional information or documentation reasonably necessary to support OPEX's compliance with the Batteries Regulation and applicable implementing or delegated acts.
Packaging and Packaging Waste Regulation (PPWR) – Regulation (EU) 2025/40	Ensure that supplied packaging and packaging materials comply with the applicable requirements of Articles 5 through 12, including requirements concerning substances in packaging, recyclability, recycled content, packaging minimization, reuse, labeling, marking, and information. Perform the conformity assessment procedure in accordance with Annex VII. Prepare and maintain the technical documentation in accordance with Annex VII. Draw up the EU Declaration of Conformity in accordance with Annex VIII.	EU Declaration of Conformity; applicable labeling and marking information; recycled content and recyclability information; packaging composition, weight, materials, and reuse information; and, upon reasonable request, any additional information, documentation, or relevant technical documentation reasonably necessary to support OPEX's compliance with the Packaging and Packaging Waste Regulation.
Waste Electrical and Electronic Equipment Directive (WEEE) – Directive 2012/19/EU	Ensure that supplied Items comply with applicable requirements for information to users under Article 14, information for treatment facilities and product identification under Article 15, and registration, information, and reporting under Article 16 and Annex X. Affix the crossed-out wheeled bin symbol in accordance with Annex IX.	User information; product marking information; required product identification information; information required for treatment facilities; applicable registration and reporting information; product weight and material composition information; recycling, recovery, and treatment information; and any additional information or documentation reasonably necessary to support OPEX's compliance with the WEEE Directive and applicable national implementing requirements.

4. Cybersecurity, Software, and Data Protection

Regulation / Legislation	Requirements	Information / Documentation
Cyber Resilience Act (CRA) – Regulation (EU) 2024/2847	Ensure that Products with Digital Elements comply with the applicable manufacturer obligations of Articles 13 and 14 and the essential cybersecurity requirements of Annex I, including cybersecurity risk assessment, vulnerability handling, support period, security updates, reporting, and corrective action requirements. Comply with the applicable requirements for conformity of the product with digital elements under Chapter III and perform the applicable conformity assessment procedure pursuant to Article 32. Prepare and maintain the technical documentation in accordance with Annex VII. Draw up the EU Declaration of Conformity in accordance with Annex V. Affix the CE marking in accordance with Article 30. Draw up the Information and Instructions to the user in accordance with Annex II.	EU Declaration of Conformity; technical documentation; cybersecurity risk assessment; Software Bill of Materials (SBOM); vulnerability handling and support-period information; notification to OPEX of any actively exploited vulnerability or severe incident affecting the security of the product with digital elements; security update information; Information and Instructions to the user; applicable conformity assessment information; and any additional information or documentation reasonably necessary to support OPEX's conformity assessment or compliance with the Cyber Resilience Act.
General Data Protection Regulation (GDPR) – Regulation (EU) 2016/679	Ensure that processing of personal data in connection with Items supplied to OPEX complies with applicable GDPR requirements. Where processing personal data on behalf of OPEX, including personal data of OPEX employees, customers, or other individuals, comply with applicable processor requirements under Article 28, including requirements concerning processing instructions, security, subprocessors, personal data breaches, and international transfers.	To the extent required under the Applicable Regulation: Data processing agreement; description of processing activities; subprocessor and processing-location information; applicable international transfer safeguards; security and data protection information; and any additional information or documentation reasonably necessary to support OPEX's compliance with the GDPR.
California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA) – California Civil Code §§ 1798.100 et seq.	Ensure that processing of personal information in connection with Items supplied to OPEX complies with applicable CCPA/CPRA requirements. Where processing personal information on behalf of OPEX, including personal information of OPEX employees, customers, or other consumers, comply with applicable service-provider or contractor requirements, including restrictions on the use,	To the extent required under the Applicable Regulation: Data processing agreement; description of processing activities; subcontractor and processing-location information; security and data protection information; and any additional information or documentation reasonably necessary to support OPEX's compliance with the CCPA/CPRA.

	disclosure, sale, and sharing of personal information and requirements concerning consumer rights and data security.	
--	--	--

5. Trade and Business

Regulation / Legislation	Requirements	Information / Documentation
U.S. Export Administration Regulations (EAR) – 15 CFR Parts 730–774	Ensure that Items supplied to OPEX comply with all applicable requirements of the EAR, including requirements concerning jurisdiction and scope, export classification, licensing, license exceptions, end use, end user, destination, reexport, and transfer (in-country). Determine and maintain the appropriate Export Control Classification Number (ECCN) or EAR99 designation for applicable Items. Promptly notify OPEX of any change affecting an Item's export classification, licensing requirements, eligibility for a license exception, or other applicable export-control requirements.	ECCN or EAR99 designation; applicable Commodity Classification Automated Tracking System (CCATS) determination or other classification documentation where available; applicable export license, license-exception, end-use, end-user, or destination information; and, upon reasonable request, any additional information or documentation reasonably necessary to support OPEX's compliance with applicable U.S. export-control requirements.
Applicable Customs Laws and Regulations	Ensure that Items supplied to OPEX comply with applicable customs and import/export requirements. Provide complete, accurate, and timely information reasonably necessary to determine tariff classification, country of origin, customs value, marking requirements, preferential origin or free-trade-agreement eligibility, and other applicable customs treatment. Promptly notify OPEX of any change affecting previously provided customs information.	Country of origin; Harmonized System (HS), Harmonized Tariff Schedule (HTS), or other applicable tariff classification; customs valuation information; product descriptions and composition information necessary for classification; applicable country-of-origin and marking information; free-trade-agreement or preferential-origin documentation where applicable; applicable customs rulings; and, upon reasonable request, any additional information or documentation reasonably necessary to support OPEX's customs and trade compliance.
Applicable Sanctions, Embargo, and Restricted Party Regulations	Ensure that Items supplied to OPEX and related transactions comply with applicable economic and trade sanctions, embargoes, restricted-party requirements, and related prohibitions and restrictions. Suppliers shall not supply Items, services, software, or technology to or on behalf of OPEX in	Upon reasonable request, provide sanctions and restricted-party compliance certifications; relevant screening information; ownership or control information reasonably necessary to evaluate restricted-party status; end-user, end-use, destination, or transaction information where applicable;

	violation of Applicable Regulations concerning sanctioned or restricted countries, territories, regions, entities, individuals, end users, or end uses. Promptly notify OPEX of any actual or potential sanctions or restricted-party issue affecting an Item, transaction, or party involved in the supply of Items to OPEX.	applicable licenses or other authorizations; and any additional information or documentation reasonably necessary to support OPEX's compliance with applicable sanctions, embargo, and restricted-party requirements.
U.S. Federal Contractor Equal Employment Opportunity and Labor Requirements – 41 CFR §§ 60-300.5(a), 60-741.5(a) / 29 CFR Part 471, Appendix A to Subpart A	OPEX Corporation is an equal opportunity employer and federal contractor and/or subcontractor. To the extent required by applicable law, Seller shall abide by the requirements of 41 CFR 60-300.5(a) and 60-741.5(a). Those regulations prohibit discrimination based on protected-veteran status or disability and require covered contractors and subcontractors to take the affirmative action required by those provisions. Seller shall also comply, to the extent required by applicable law, with 29 CFR Part 471, Appendix A to Subpart A, which is incorporated herein by reference.	Upon reasonable request, information or documentation reasonably necessary to demonstrate compliance with applicable U.S. federal contractor requirements.

6. Ethical and Human Rights

Regulation / Legislation	Requirements	Information / Documentation
U.S. Tariff Act of 1930, Section 307 (19 U.S.C. § 1307); U.S. Trafficking Victims Protection Act and related federal requirements; California Transparency in Supply Chains Act; UK Modern Slavery Act 2015; Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act; and other applicable forced-labor, child-labor, human-	Ensure that Items supplied to OPEX are not manufactured, mined, produced, or sourced, wholly or in part, through forced labor, child labor, human trafficking, debt bondage, or other forms of labor prohibited by Applicable Regulation. Implement and maintain appropriate risk-based policies, due diligence, supply-chain risk assessments, traceability, monitoring, and remediation processes as reasonably necessary to identify, prevent, mitigate, and remediate applicable forced-labor and modern-slavery risks. Cooperate with OPEX's supplier due diligence, assessments, audits, investigations, and corrective actions. Promptly notify OPEX of any actual or suspected non-compliance, government investigation, enforcement action, detention, exclusion, seizure, or	Upon reasonable request, provide completed OPEX supplier questionnaires, supplier declarations, policies and codes of conduct, risk assessments, due-diligence records, supply-chain traceability information, audit reports, certifications, corrective-action plans, training records, remediation records, and any additional information or documentation reasonably necessary to support OPEX's compliance with applicable forced-labor, child-labor, human-trafficking, and modern-slavery requirements.

trafficking, and modern-slavery requirements	other circumstance that may affect the lawful supply of Items to OPEX.	
International Anti-Bribery, Anti-Corruption, Fraud, and Corporate Crime Laws – UK Bribery Act 2010, UK Economic Crime and Corporate Transparency Act 2023, U.S. Foreign Corrupt Practices Act (FCPA), U.S. Federal Fraud Statutes, Canadian Criminal Code, and other applicable laws	Ensure compliance with applicable anti-bribery, anti-corruption, fraud, and corporate-crime requirements in connection with Items supplied to OPEX and business conducted with or on behalf of OPEX. Suppliers shall not offer, promise, give, authorize, request, agree to receive, or accept any bribe, kickback, improper facilitation payment, or other improper payment or benefit. Suppliers shall maintain policies, procedures, due diligence, internal controls, monitoring, training, and reporting mechanisms appropriate to their applicable risks and legal obligations, including procedures reasonably designed to prevent bribery, corruption, and fraud. Cooperate with OPEX's reasonable compliance due diligence, assessments, investigations, and corrective actions. Promptly notify OPEX of any actual or suspected material non-compliance, government investigation, enforcement action, or other circumstance that may materially affect compliance relating to business conducted with or on behalf of OPEX.	Upon reasonable request, provide applicable anti-bribery, anti-corruption, fraud-prevention, and corporate-compliance policies; codes of conduct; risk assessments; due-diligence records; compliance certifications; training information; relevant audit or monitoring information; corrective-action or remediation information; and any additional information or documentation reasonably necessary to support OPEX's compliance with applicable anti-bribery, anti-corruption, fraud, and corporate-crime requirements.

Revisions

This Specification is a living document.

OPEX may revise this Specification periodically to reflect changes in Applicable Regulations, standards, internal policies, business requirements, or industry best practices. The Supplier is responsible for periodically visiting the OPEX website at OPEX.com to check for updates to this Specification and for ensuring that it is using the then-current version. Alternatively, the Supplier may at any time request from OPEX a copy of the then-current version of this Specification.

Version	Description	Revision Date	Review Date	Reviewer / Approver Name
1.0	Initial release of specifications.	23 Oct 2026	23 Oct 2027	John Sullivan, Corporate & Legal Affairs; Katharina Wright, Corporate & Legal Affairs; Andy Brimelow, Purchasing; Josh Bier, Supplier Declaration Group; Danielle Gulli, Supplier Declaration Group