	<p>Ace Computers EPEAT 7.1.3 Social responsibility performance audits of high-risk suppliers Audit Methodology & Results Report Publication Date: May 15, 2025 Auditor: Timothy Whitney</p>
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FORWARD

Ace Computers has completed the following “Supplier Labor Rights and OHS Audit” in compliance with EPEAT Criteria for “7.1.3 Required – Social responsibility performance audits of high-risk suppliers”.

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SECTION 1: Risk Assessment Background

Ace Computers participates in the online Registry of products covered under the EPEAT ecolabel. The EPEAT ecolabel is the leading global Type-1 ecolabel for these technology products. The Global Electronics Council (GEC) manages the EPEAT ecolabel, including the Conformity Assurance Bodies that provide 3rd party verification of the products listed in this Registry. Products must meet certain required and optional EPEAT criteria to be considered "EPEAT-registered" and be listed on this site. The specific EPEAT tier achieved by a product aligns with the number of optional criteria the product meets.

1.1: Purpose of Risk Assessment

Ace Computers is applying for the required criteria "7.1.3 Required – Social responsibility performance audits of high-risk suppliers". Under these criteria there are requirements and guidance that must be followed and met for determining supplier scope and compliance in the categories of labor rights and Occupational Health and Safety (OHS).

1.2: Defining Risk and Risk Assessment

Risk is defined and must be assessed in the labor rights and OHS category. EPEAT sets out guidance for which Ace Computers has determined their risk parameters and completed the assessment. Essential requirements include the GEC's publishing of "Responsible Supply Chains Criteria" 2025 Annex B (Normative): Labor Rights and Occupational Health and Safety Requirements and Annex C (Normative): Factors to determine prioritized manufacturer and/or supplier facilities.

To meet EPEAT criteria 7.1.3., Ace must assess its key suppliers as In-scope or Out-of-scope. Out-of-scope facilities are those facilities that are reasonably above the threshold of risk for OHS violations, and as such require no further action or corrective action. In-scope facilities include the manufacturer or are those directly contracted suppliers that fall below the thresholds of acceptable risk for OHS violations and require verification of certifications that prove the facility has acquired management systems that reduce potential risks that were identified during the auditing process. The latter designation is known as "Prioritized".

Before EPEAT's Conformity Assurance Body can verify that Ace Computers has demonstrated conformance with the criteria, Ace must prove that the guidelines for each of the categories have been met. To meet the guidelines Ace Computers first established a scoping tool to achieve scoping parameters. Then they demonstrated the scope of identified facilities by gathering data. Once this process was finalized, Ace completed risk analysis of the data to analyze and determine if a facility was In-scope or Out-of-scope. This process determined whether the data could be turned over to the Conformity Assurance Body, or if additional conformance data was needed. Finally, after discussions with Conformity Assurance Body, and upon their determination that ACE has met all necessary verification requirements, Ace can be awarded EPEAT Conformance, and the criteria can be added to Ace Computer's EPEAT Registry. Below is a summary of the definitions, requirements, and verifications to be set in demonstrating conformity with EPEAT.

DEFINITIONS

audit: Audits against labor and OHS requirements.

supplier: An entity that provides goods or services to the manufacturer.

product: A marketing model and chassis type associated with a unique product registration, including accessories and peripherals, integral to the operation of the product and contained by default in the point of sale (POS) packaging associated with the unique product registration, excluding consumables in imaging equipment.

REQUIREMENTS

Part A – Assessment to Determine Prioritized Supplier Facilities in Scope:

Manufacturer shall provide written documentation of its risk assessment process for the identification of Prioritized Supplier Facilities subject to the supplier audit criteria in Part B of this criterion. The risk assessment process shall include, at minimum, the risk categories identified in Annex C. Manufacturer shall provide documentation which outlines how the risk assessment process was applied across the manufacturer's supply chain and how risk was evaluated, such as through weighting factors and the consideration of probability, frequency and severity of the risk. The manufacturer's risk assessment methodology shall identify Prioritized Supplier Facilities. Supplier facilities found to have risk factors, based on priority non-conformances that have not been remediated within the timeframe specified by the supplier audit approach employed as required by Part B of this criterion, are to be considered Prioritized Supplier Facilities. Risk assessments are reviewed and updated as needed, at least annually.

Part B – Supplier Audits:

Manufacturer shall ensure that all supplier facilities in scope (i.e., Prioritized Supplier Facilities), as identified in Part A, have any one of the following:

- a) Certified by accredited CBs to SA8000 and ISO 45001. Certification bodies for SA8000 shall be accredited by SAI SAAS to certify to the SA8000. Certification bodies for ISO 45001 shall be accredited by a globally recognized AB. The certification shall be no older than three years, or
- b) Audited to the RBA Code of Conduct using the VAP, or
- c) Audited on site every two years in an audit program of management systems meeting the requirements of SA8000 and ISO 45001 covering the labor rights and OHS provisions in Annex B.

Part C – A Summary of Audit and Corrective Action Reports:

Manufacturer shall annually publish the below listed items regarding assessments conducted within the supply chain. The report, which may be included as part of the manufacturer's annual public reporting shall include all of the suppliers in scope for Part B (i.e., Prioritized Supplier Facilities), and may include additional facilities. Manufacturer may choose the initial 12-month period covered by the audit and corrective action report and must use the same 12-month period every year.

VERIFICATION REQUIREMENTS

This criterion is verified at the product category level.

Verification Part A – Assessment to Determine Prioritized Supplier Facilities in Scope:

- a) Documentation of process to identify Prioritized Supplier Facilities that demonstrates conformity to this criterion.
- b) As part of the documentation of process to identify Prioritized Supplier Facilities, rationale for approach to determine facilities that are and are not Prioritized Supplier Facilities.
- c) Where industry-independent civil society organizations allege and provide documented evidence of manufacturer's facilities' failure to meet compliance of the provisions in Annex B, evidence that the manufacturer's documented process for addressing allegations was followed. Where no allegations have been raised under c) above or where manufacturer's supplier has not previously conducted an audit, verification will be limited to a) and b).
- d) To demonstrate facilities are not in regions where qualified, independent, third-party audits cannot be performed as part of credible forced labor due diligence processes:
 - i. List of cities and regions of all in-scope suppliers,
 - ii. List of regions where independent third-party audits cannot be performed, and identification of those which are Prioritized Supplier Facilities as required by this criterion, and
 - iii. Evidence that supplier list(s) are updated at least annually.

EPEAT CRITERIA ANNEX REFERENCES (Annex B and C)

Annex B (Normative): Labor Rights and Occupational Health and Safety Requirements

For the purposes of this annex, "labor rights" and "occupational health and safety" include the following:

1. ILO Fundamental Principles and Rights at Work These principles and rights are identified in the ILO Declaration on Fundamental Principles and Rights at Work, and defined in the following Conventions:

- A Safe and Healthy Work Environment (C155 and C187)
- Child labor and the worst forms of child labor (C138 and C182)
- Discrimination (employment and occupation) (C111)
- Equal Remuneration Convention (C100)
- Forced labor (C029 and C105)
- Freedom of association and collective bargaining (C087 and C098) For the purposes of these requirements, "labor rights" also includes the principles and rights defined in the ILO C190.

2. Occupational Health and Safety (OHS)

The OHS principles are defined in the following ILO Conventions, which were added to the ILO Declaration as fundamental to a Safe and Healthy Work Environment (added by Amendment in 2022):

- Occupational Safety and Health Convention, 1981 (C155) and Recommendation, 1981 (R164)

- Promotional Framework for Occupational Safety and Health Convention, 2006 (C187) The requirements of this annex also include the OHS due diligence principles found in the management system major categories of ISO 45001:
- OHS management system describing context of the organization,
- Leadership and worker participation including OHS Policy, Roles, Responsibilities, Accountabilities and Authorities,
- Risk and hazard identification and assessment and determination of applicable OHS legal requirements and other OHS requirements and risks, including related actions and objectives to address them,
- Provision of resources competence and awareness; information and communication and documented information,
- Operational planning and control including operational controls that apply to outsourcing, procurement and contractors, emergency preparedness and response and change management,
- Performance evaluation including internal audits, monitoring and measurement, analysis and evaluation and management review, and
- Incidents, nonconformities and corrective action, continual improvement of objectives and processes. Additional (non-mandatory) guidance may be found in ILO Technical Conventions, as relevant, including the following:
 - Asbestos Convention, 1986 (C162) and Recommendation, 1986 (R172)
 - Chemicals Convention, 1990 (C170) and Recommendation, 1990 (R177)
 - Code of Practice: Prevention of Major Industrial Accidents
 - Code of Practice: Safety in the use of chemicals at work
 - Prevention of Major Industrial Accidents Convention, 1993 (C174) and Recommendation, 1993 (R181)
 - Radiation Protection Convention, 1960 (C115)
 - Working Environment (Air Pollution, Noise and Vibration) Convention, 1977 (C148) and Recommendation, 1977 (R156)

3. Minimum Wage, Working Hours, Overtime and Employment Contracts “Labor Rights” also includes the following areas regulated by domestic law in the applicable legal jurisdiction and/or by the international standards identified below at the highest level required:

- minimum wages (ILO C131)
- standard working hours (60-hour maximum workweek or local laws, whichever is less)
- overtime compensation, and
- employment contractual relationships

4. Prohibition of Trafficking in Persons

“Labor Rights” further includes the prohibition of trafficking in persons as defined in the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, 40 supplementing the United Nations Convention against Transnational Organized Crime.

Annex C (Normative): Factors to determine prioritized manufacturer and/or supplier facilities

The following risk categories, at minimum, shall be considered in the risk assessment process to identify prioritized facilities:

1. Geographic-specific risk — Conditions in a particular location which may make sector risks more likely

a) For labor, geographic consideration of risk may include location in a country whose:

i. government does not fully comply with the minimum standards for the elimination of trafficking of the Victims of Trafficking and Violence Protection Act of 2000 (TVPA), as identified as Tier 2 Watch List or Tier 3 countries in the U.S. Department of State Trafficking in Persons (TIP) Report.

ii. policies (e.g., laws, government, enforcement) or geopolitical conditions reinforce corruption, or repression of either freedom of association or cultural groups, by government and/or society.

2. Product and sector-specific risk — Risks prevalent within a product's sector globally as demonstrated by:

a) For labor,

i. facilities that use flexible labor or non-standard employment arrangements or migrant workers, third-party agencies to meet production targets, and/or restrict access to auditors or employee representation by worker organizations.

ii. facilities that have received (1) a written claim, complaint or grievance of one or more Labor Rights reflected in Annex B that has been submitted to the authorized decision making body and has not been formally dismissed; or (2) an assertion regarding one or more of the Labor Rights reflected in Annex B, by workers or other advocates to an international organization such as the ILO or a OECD National Contact Point that has not been demonstrably resolved; or (3) most severe nonconformance in the audit protocol being used resulting from an audit, as available, from a stakeholder (regulators, client, parent company, association, NGO) that has not been remediated.

b) For OHS,

i. high risk work tasks based on dangerous conditions, excessive working hours (i.e., over 60 hours total weekly)

ii. facilities that have received (1) a formal filing alleging a significant legal or contractual violation of OHS related laws or regulations reflected in Annex B that has not been formally dismissed; or (2) most severe non-conformance in the audit protocol being used, whether an internal or external stakeholder audit (client, parent company, association, regulatory or compliance audit) that has not been remediated.

c) For labor and OHS, public media story(ies), assertions or allegation(s) made to a brand, investor or international organization in the past year that assert a major nonconformity has occurred based on viable evidence that has not been withdrawn, disproven or evaluated and dismissed.

3. Enterprise-specific risk, where applicable – risks associated with specific enterprise such as poor corporate governance, and poor history of conduct in respecting human rights, labor rights, anticorruption standards. Factors considered may include:

a) Lack of existence of worker organization or union as self-reported by the factory.

b) Information that includes assertions or allegations pertaining to facilities' failure to meet the provisions in Annex B from internal or external worker-lead or focused groups (e.g., NGOs, joint safety committees), organizations representing workers' interest, including worker organizations established consistent with ILO C087 and C098, representative unions in instances where a union is present, public oversight watchdogs, and regulatory bodies.

c) Prior audit performance and available lists/reports of prior grievances.

d) Ties to entities manufacturing products made in part or whole with forced labor as identified on internationally respected global lists developed by national and/or regional governments, or withholding of goods not released by customs based on affirmation of a labor related violation.

i. Goods with a withhold release order issued by U.S. Customs and Border Protection 82 or listed on the Bureau of International Labor Affairs (ILAB) List of Goods Produced by Child Labor or Forced Labor.

4. Supplier characteristics /materiality risk - supplier characteristics relevant to the significance or importance of the supplier either overall or to the manufacturer. Factors may include:

a) size of the supplier (e.g., large enterprise or small and mid-size enterprise)

b) size of supplier workforce

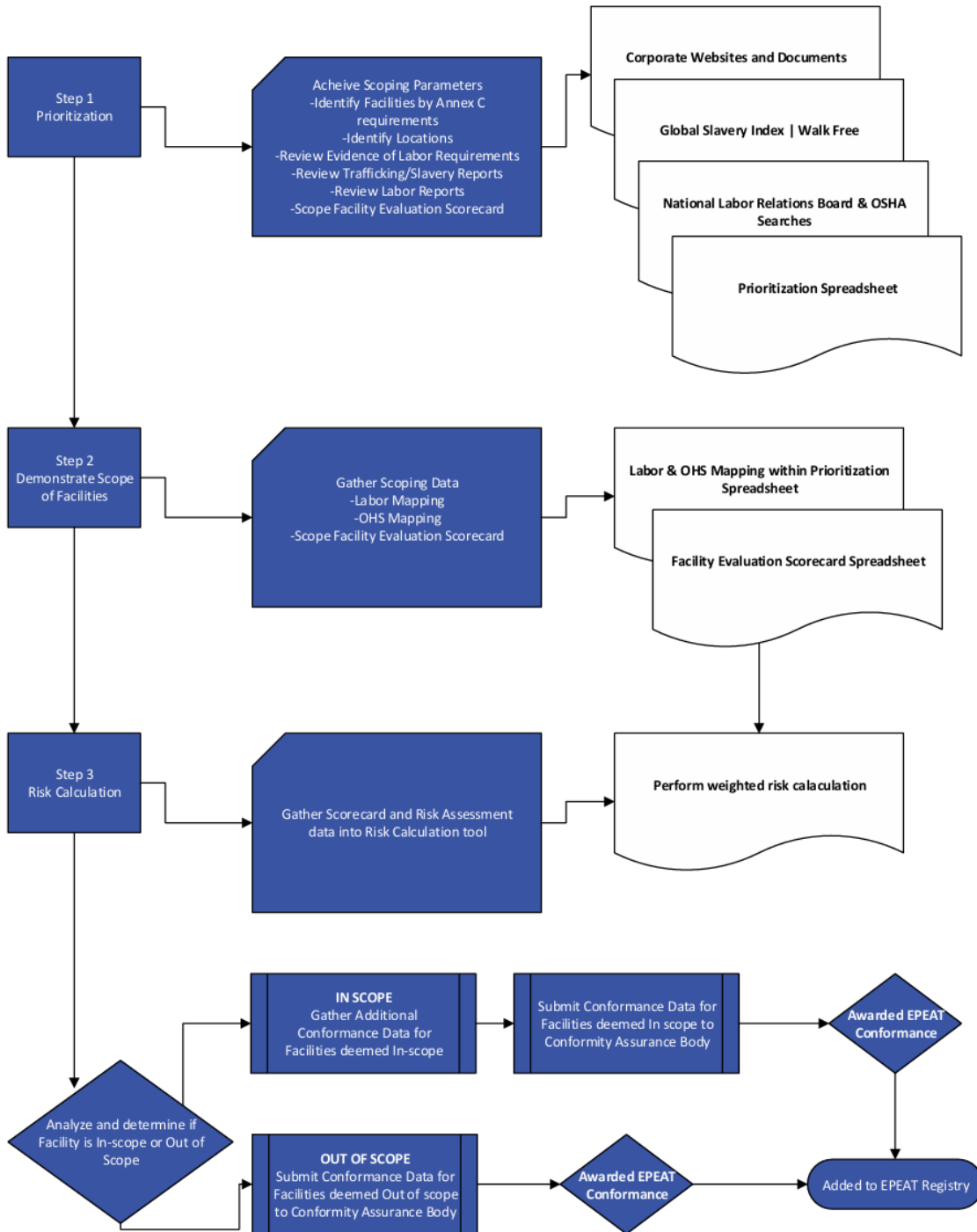
c) percentage of manufacturer spend paid to the supplier

d) single source supplier

e) type of product.

SECTION 2: Methodology

2.1: Audit Diagram



2.2: Supplier Risk Identification

Our EPEAT Conformity Assurance Body issued guidance to devise a tool to determine if the significant suppliers were in-scope or out-of-scope. To qualify as out-of-scope, the frequency and likelihood of a violation by an entity of its legal obligations had to be within an acceptable risk level. [See definition of Acceptable Risk]. If a facility has anything lower than acceptable risk, they are in-scope and must meet additional “requirements for facilities in scope.” See “Risk Assessment” (Sections 3.1-3.2) below for further detail on rational and risk score threshold.

2.3: Risk Analysis

To perform a rigorous analysis of EPEAT Social Responsibility of Suppliers Criteria 7.1.3, Ace Computers deployed the following 1. Risk Assessment to understand how the manufacturer/supplier scores on a range of risk categories, 2. A Labor Rights and OHS Scorecard to audit suppliers’ key labor rights and OHS compliance, and 3. a Risk Calculation tool to synthesize the investigation with an index and weighted multiplier based on significance of manufacturer-supplier relationship.

First, the Risk Assessment is a table based on risk categories of Geographic-specific, Labor and OHS, Enterprise Conduct, and Materiality. Risk Assessment categories were selected based on the requirements identified in EPEAT Annex C. The Risk Assessment serves to organize data at later informs key risk designations.

Second, the Labor Rights and OHS Scorecard provide data from the supplier audit(s) whose requirements meet Annex B. Evidence is collected under each category for the supplier. The Scorecard results appear in the Risk Assessment as “pass” or “fail” under “ACE Assessment Labor and OHS Rights Requirements Scorecard”. The Scorecard is based on Ace’s previously EPEAT approved Scorecard used in FY 2023 for manufacturer and supplier auditing. The current scorecard is updated with EPEAT’s newest criteria requirements. Scorecard Mapping displays evidence that correlates with each of Annex B’s retirements and scored in the Scorecard from 1-5*. With these additional parameters, a threshold of 94 is established as “pass” or “fail” for labor rights and OHS performance. The labor rights and OHS Scorecard heavily informs risk categories found in the Risk Assessment and factored into the Risk Calculation. See the Scorecard and Scorecard Mapping in Section 3.2 for further detail and visualization.

Third, all research informs the Risk Calculation tool. Scores are assigned based on the data collected in the Risk Assessment table and Labor Rights and OHS Scorecard. Each risk category is given a result based on its “evidence of compliance” as listed from 1-5*. This is called Risk Score. This score, out of 15, is multiplied against the Materiality Score (1-5) for the supplier. Materiality is determined on the basis of significance (see Section 2.4 for Score Keys). Significance is defined in this criterion as factors that include size of organization, workforce, and percentage of manufacturer spend to supplier (Annex C). The higher the score, the higher the risk for a facility. The threshold for risk yielding an in-scope designation is a Scope Score of 45/75. In or out of scope determination is based on the Scope Score. Lower than a Scope Score of 45 is considered not Prioritized and higher is Prioritized (see Section 2.4 for details on Scope Score).





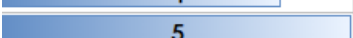
*Note: the 1-5 Score Keys are different for the Annex B based Labor Rights and OHS Scorecard” and the Annex C based Risk Assessment and Risk Calculation. See Score Keys in Sections 2.4 and 3.2 for details.

2.4: Risk Assessment Methodology





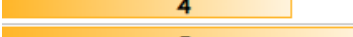
Risk Calculation

Methodology			
Risk Calculation per supplier			
$\text{Risk} \times \text{Materiality} = \text{Scope}$			
Risk Calculation per supplier - expanded			
$(\text{Risk Category Score a} + \text{Risk Category Score b} + \text{Risk Category Score c}) \times (\text{Scope Multiplier Score}) = \text{Supplier Scope Score}$			
<i>See Score Key and Score Key Footnotes (below) for further methodology</i>			





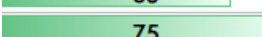
Risk Calculation Score Keys

RISK SCORE KEY*	
 1	Very Low: Complete evidence of compliance
 2	Low: Strong evidence of compliance
 3	Standard: Sufficient evidence of compliance
 4	High: Missing evidence of compliance
 5	Very High: Evidence against compliance

*Risk score is defined by three main categories in Annex C (1-3). Evidence supporting scores is provided in "Risk Assessment" Sheet.

MATERIALITY SCORE KEY**	
 1	Very Low Materiality
 2	Low Materiality
 3	Standard Materiality
 4	High Materiality
 5	Very High Materiality

**Materiality is defined by Annex C (4, a-e). Materiality indicates significance of a manufacturer-supplier relationship. Annex C part 4c defines annual percentage spend as a significant variable. Annual percentage spend is weighted in this assessment for its impact on materiality.

SCOPE SCORE KEY***	
 15	Very Low Risk Relationship: Out of Scope Supplier, Unprioritized
 30	Low Risk Relationship: Out of Scope Supplier, Unprioritized
 45	Medium Risk Relationship: In Scope Supplier, Prioritized
 60	High Risk Relationship: In Scope Supplier, Prioritized
 75	Very High Risk Relationship: In Scope Supplier, Prioritized

***Scope score is a function of the materiality score and the risk score (both as defined to the left). Suppliers must be in scope to be prioritized. Score starts at 1 and may increase up to 75.

SECTION 3: Results

3.1: Supplier Labor Rights and OHS Audit Results

Risk Assessment

Risk Assessment	Risk Categories (Annex C)										
	Geographic-specific		Labor and OHS			Enterprise Conduct			Materiality		
Name	Geographic Location Based on Corporate Headquarters	Trafficking Tier by Nation; https://www.state.gov/wp-content/uploads/2025/02/Tier-1-Strongest-enforcement	Evidence of OHS Requirements	OSHA Complaints	ACE Assessment Labor and OHS Requirements Scorecard	Prior Audit Performance (FY 2023)	Ace Supplier Code of Conduct Agreement	Positive Evidence of Conduct Requirements	Percentage of Annual Spend	Size of Supplier	Size of Workforce
A	USA	Tier 1 (Strongest enforcement)	Non RBA Guided Supplier Code of Conduct	None	Pass	Pass	Yes	Missing	8.41%	Small-cap	700
B	USA	Tier 1 (Strongest enforcement)	RBA Guided Supplier Code of Conduct	Complaint, closed 2024	Pass	Pass	Yes	Strong	29.15%	Mid-cap	23,500
C	USA	Tier 1 (Strongest enforcement)	Non RBA Guided Supplier Code of Conduct	None	Pass	Pass	Yes	Strong	7.78%	Mid-cap	28,500

Risk Calculation Results

Risk Calculation	Risk Categories (1-5)			Risk Score (/15)	Materiality Score (/5)	Scope Score (/75)
Name of Supplier	Geographic-specific Risk	Labor and OHS Risk	Enterprise Conduct	15	5	75
A	1	2	2	5	4	20
B	1	1	1	3	5	15
C	1	1	1	3	4	12

Final Risk Score Key

SCOPE SCORE KEY***		
15	Very Low Risk Relationship: Out of Scope Supplier, Unprioritized	
30	Low Risk Relationship: Out of Scope Supplier, Unprioritized	
45	Medium Risk Relationship: In Scope Supplier, Prioritized	
60	High Risk Relationship: In Scope Supplier, Prioritized	
75	Very High Risk Relationship: In Scope Supplier, Prioritized	

***Scope score is a function of the materiality score and the risk score (both as defined to the left). Suppliers must be in scope to be prioritized. Score starts at 1 and may increase up to 75.

3.2: Audit Scorecard and Mapping

Labor Rights and OHS Audit Score

Evaluation Category		Performance Expectations			ACE ASSESSMENT AUDIT SCORE		
					A	B	C
Labor: International Labor Standards Supported	Freedom of association and collective bargaining (C. 87 and C. 98)				5	5	5
	Forced labor (C. 29 and C. 105)				5	5	5
	Child labor and the worst forms of child labor (C. 138 and C. 182)				5	5	5
	Discrimination (employment and occupation) (C. 111)				5	5	5
	Safe and Healthy Environment (C. 155 and C187)				5	5	5
	Equal Remuneration Convention (C.100)				5	5	5
Labor: International Labor Standards Supported TOTAL SCORE					30	30	30
Labor: Domestic law in the legal jurisdiction regulating	Minimum wages (C. 131)				5	5	5
	Working hours				5	5	5
	Overtime compensation				5	5	5
	Employment contractual relationships				5	5	5
Labor: Domestic law in the legal jurisdiction regulating TOTAL SCORE					20	20	20
Labor: Human trafficking	Policies to Prevent Trafficking in Persons Especially Women and Children				5	5	5
	Policies to Suppress Trafficking in Persons Especially Women and Children				5	5	5
	Policies to Punish Trafficking in Persons Especially Women and Children				3	5	1
Labor: Human trafficking TOTAL SCORE					13	15	11
Labor: Prioritization Assessment Tool	Risk Assessment Mapping				5	5	5
	Self-identification by the supplier of risk				5	5	5
	SA 8000				0	0	0
	RBA Validated Audit Process (VAP)				0	0	0
Labor: Prioritization Assessment Tool TOTAL SCORE					10	10	10
(OHS) Management Systems	OHS management system describing context of the organization.				5	5	5
	Leadership and worker participation including OHS Policy, Roles, Responsibilities, Accountabilities, and Authorities.				5	5	5
	Risk and hazard identification and assessment and determination of applicable OHS legal requirements and other OHS requirements and risks, including related actions and objectives to address them.				5	5	5
	Provision of resources competence and awareness, information and communication and documented information.				5	5	5
	Operational planning and control including operational controls that apply to outsourcing, procurement and contractors, emergency preparedness and response and change management.				1	5	5
	Performance evaluation including internal audits, monitoring and measurement, analysis and evaluation and management review.				5	5	5
	Incidents, nonconformities and corrective action, continual improvement of objectives and processes.				1	5	5
SCHEDULE TOTAL SCORE					27	35	35
OHS: Prioritization Assessment Tool	Risk Assessment Mapping				5	5	5
	Self-identification by the supplier of risk				5	5	5
	ISO 45001 Audit Results				0	5	5
	RBA Validated Audit Process (VAP)				0	0	0
HEALTH & SAFETY TOTAL SCORE					10	15	15
TOTAL SCORE					110	125	121

"Risk Assessment Score In-scope = 93 or less score in Performance Expectations.
Out-of-scope = 94 or higher score in Performance Expectations."

Labor Rights and OHS Audit Score Key

SCORE KEY	
5	Very Good: Exceeds expectations
4	Good: Meets expectations
3	Standard: Meets most expectations
2	Adequate: Meets some expectations
1	Unsatisfactory: Misses most expectations
0	Substandard: Falls far below expectations

Scorecard Mapping

Supplier Mapping		Labor Rights and OHS Management Systems					
Name	Annex B Section		1		2	3	4
	Geographic Location Based on Corporate Headquarters	OHS management system describing context of the organization.	Leadership and worker participation including OHS Policy, Roles, Responsibilities, Accountabilities, and Authorities.	Risk and hazard identification and assessment and determination of applicable OHS legal requirements and other OHS requirements and risks, including related actions and objectives to address them.	Provision of resources competence and awareness, information and communication and documented information.	Operational planning and control including operational controls that apply to outsourcing, procurement and contractors, emergency preparedness and response and change management.	Performance evaluation including internal audits, monitoring and measurement, analysis and evaluation and management review.
A	Introductory Language & Policy	Performance Discipline, Layoff, & Termination	Safety & Loss Prevention	General Policies	General Policies and Safety & Loss Prevention	Hiring and Orientation Policies and Performance Discipline, Layoff, & Termination	Safety & Loss Prevention
B	Supplier uses same RBA that reflects ACES. E Management Systems generally and 1) Company Commitment	Supplier uses same RBA that reflects ACES. E Management Systems generally and 2) Management Accountability and Responsibility	Supplier uses same RBA that reflects ACES. E Management Systems generally and 4) Risk and Hazard Identification and Assessment and Risk Management	Supplier uses same RBA that reflects ACES. E Management Systems generally and 5) Improvement Objectives, 6) Training, 7) Communication, 8) Worker Feedback, Participation & Grievance, 11) Documentation & Records	Supplier uses same RBA that reflects ACES. E Management Systems generally and 2) Management Accountability and Responsibility, 4) Risk and Hazard Identification and Assessment and Risk Management, 5) Improvement objectives, 7) Communication, 9) Audits and Assessments, 10) Corrective Action Process, 11) Documentation and Records	Supplier uses same RBA that reflects ACES. E Management Systems generally and 2) Management Accountability and Responsibility, 5) Improvement Objectives, 9) Audits and Assessments, 10) Corrective Action Process, 11) Documentation and Records	Supplier uses same RBA that reflects ACES. E Management Systems generally and 5) Improvement Objectives, 10) Corrective Action Process, 11) Documentation and Records
C	Global Human Rights Policy (Under: Reporting) Reflects Aces COC, E Management Systems generally and 1) Company Commitment	Global Human Rights Policy (Under: Reporting) Reflects Aces COC, E Management Systems generally and 1) Company Commitment	Under: Health and Safety standards Reflects Aces COC, E Management Systems generally and 4) Risk and Hazard Identification and Assessment and Risk Management	Under: Education and Reporting standards Reflects Aces COC, E Management Systems generally and 5) Improvement Objectives, 6) Training, 7) Communication, 8) Worker Feedback, Participation & Grievance, 11) Documentation & Records	Under: Due Dilligence standards Reflects Aces COC, E Management Systems generally and 2) Management Accountability and Responsibility, 4) Risk and Hazard Identification and Assessment and Risk Management, 5) Improvement objectives, 7) Communication, 9) Audits and Assessments, 10) Corrective Action Process, 11) Documentation and Records	Under: Due Dilligence standards Reflects Aces COC, E Management Systems generally and 2) Management Accountability and Responsibility, 5) Improvement Objectives, 9) Audits and Assessments, 10) Corrective Action Process, 11) Documentation and Records	Under: Due Dilligence standards reflects Aces COC, E Management Systems generally and 5) Improvement Objectives, 10) Corrective Action Process, 11) Documentation and Records

3.3: General Audit Results and Risk Determination

Ace Computer's suppliers were selected for auditing based on the specific requirements as set forth by GEC EPEAT Criterion 7.1.3. The three selected suppliers scored low enough in their Risk Assessments and Scorecard to be determined Not Prioritized. Although posing a strong relationship to Ace as determined by high annual spend percentage and the reflecting high Materiality Score, the facilities did not create the size or scope of compliance breach necessary for the manufacturer to ensue corrective action.

The high conformance identified in the above data is a product of well-vetted supplier partnerships. Ace has historically based its purchasing practices on factors including the labor rights and OHS compliance of an organization and its contracted facilities. This includes actions such as the recent cessation in business between the manufacturer and poorly performing suppliers.

Engagement between stakeholders within Ace's supply chain with EPEAT Responsible Supply Chains Criteria is constantly in development. Ace endeavors to be ahead of all requirements in labor rights and OHS in their supply chain.

I: List of Related Documents

[ACE150 Supplier Code of Conduct 10/23/23](#)

II: Sources of Information

EPEAT Responsible Supply Chians Criteria:

https://globalelectronicscouncil.org/wp-content/uploads/EPEAT_RSC_2025.pdf

Ace Computers Official Website:

[IT Services Company Solutions | Ace Computers](#)

III: Whom to contact

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