



Code of Conduct

Participant (i.e.: signed party) shall declare its support for the Code received from Imbema and actively pursue conformance to the Code. Fundamental to adopting the Code is the understanding that a business, in all of its activities, must operate in full compliance with the laws, rules and regulations of the countries in which it operates. In no case can complying with the Code violate local laws. If, however, there are differing standards between this Code and local law, the local law shall always prevail.

1. LABOR

Participants are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. **The labour standards are:**

1.1. Freely Chosen Employment:

- 1.1.1. Forced, bonded (including debt bondage) or indentured labour, involuntary or exploitative prison labour, slavery or trafficking of persons shall not be used. This includes transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services.
- 1.1.2. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company provided facilities.
- 1.1.3. All work must be voluntary, and workers shall be free to terminate their employment.
- 1.1.4. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law.
- 1.1.5. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

1.2. Young Workers

- 1.2.1. Child labour is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.
- 1.2.2. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.
- 1.2.3. Participant shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks



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1.3. Working Hours

- 1.3.1. Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations.
- 1.3.2. Workers shall be allowed at least one day off every seven days.

1.4. Wages and Benefits

- 1.4.1. Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.
- 1.4.2. Deductions from wages as a disciplinary measure shall not be permitted.
- 1.4.3. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed.
- 1.4.4. All use of temporary, dispatch and outsourced labour will be within the limits of the local law.

1.5. Humane Treatment

There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment.

1.6. Non-Discrimination

Participants should be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, colour, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training.

1.7. Freedom of Association

Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment. Under no circumstance workers shall be restrained from joining trade unions of their own choosing in accordance with the local law.

2. HEALTH AND SAFETY

Participants recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. **The health and safety standards are:**



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2.1. Occupational Safety Worker

- 2.1.1. Potential for exposure to safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicles, and fall hazards) are to be identified and assessed, and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training.
- 2.1.2. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards.

2.2. Emergency Preparedness Potential

Emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures. Such plans and procedures shall focus on minimizing harm to life, the environment and property.

2.3. Occupational Injury and Illness

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

2.4. Industrial Hygiene

- 2.4.1. Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled, this includes educational materials about the risks associated with this exposure.
- 2.4.2. Potential hazards are to be eliminated or controlled through proper design, engineering and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment.

2.5. Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards. Interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

2.6. Sanitation, Food, and Housing

Workers are to be provided with ready access to clean toilet facilities, potable water and eating facilities. Worker dormitories provided by the Participant or a labour agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting heat and ventilation, individually secured



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accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

2.7. Health and Safety Communication

Participant shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards.

3. ENVIRONMENTAL

Participants recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public.

The environmental standards are:

3.1. Environmental Permits and Reporting

All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

3.2. Pollution Prevention and Resource Reduction

- 3.2.1. Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means.
- 3.2.2. Participant shall not participate in and/or operate any kind of environmental dumping.
- 3.2.3. The use of natural resources, including water, fossil fuels, minerals and virgin forest products, is to be conserved or by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.

3.3. Hazardous Substances

Chemicals and other materials posing a hazard to humans or the environment are to be identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

3.4. Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge. Participant shall conduct routine monitoring of the performance of its air emission control systems.



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3.5. Materials Restrictions

Participants are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labelling for recycling and disposal.

3.6. Energy Consumption and Greenhouse Gas Emissions

- 3.6.1. Energy consumption and all relevant greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level.
- 3.6.2. Participants are to look for cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

4. ETHICS

To meet social responsibilities and to achieve success in the marketplace, Participants and their agents are to uphold **the standards of ethics including:**

4.1. Business Integrity

The highest standards of integrity are to be upheld in all business interactions. Participants shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

4.2. No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted.

4.3. Disclosure of Information

- 4.3.1. All business dealings should be transparently performed and accurately reflected on Participant's business books and records.
- 4.3.2. Information regarding participant labour, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

4.4. Intellectual Property

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and, customer and supplier information is to be safeguarded.



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4.5. Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld. Protection of Identity that ensure confidentiality and anonymity and protection of whistle-blowers are to be maintained, unless prohibited by law.

4.6. Responsible Sourcing of Minerals

- 4.6.1. Participants shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in any country.

4.7. Privacy

Participants are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees and Participants are to comply with privacy and security laws and regulations when personal information is collected, stored, processed, transmitted and shared.

5. MANAGEMENT SYSTEMS

Participants shall adopt or establish a management system whose scope is related to the content of this Code.

The management system should contain the following elements:

5.1. Compliance

Participant shall in all time comply with applicable laws, regulations and customer requirements related to the Participant's operations and products. Participant shall also in all time comply with this Code.

5.2. Audits

If desired by Imbema, Participant agrees to let Imbema (or a third party chosen by Imbema) carry out audits in order to ensure conformity to legal requirements, regulations and conformance of this Code.

5.3. Participants Responsibility

Participant shall maintain and/or improve their social and environmental responsibility to ensure a sustainable, durable and responsible supply chain. Besides, Participant shall identify and mitigate the operational risks related to this Code.

Date: _____

Time: _____

Participant: _____

Function: _____

Signature