

# MISTEQUAY GROUP

# SUPPLIER CODE OF CONDUCT

**At Mistequay, Our mission is to perform beyond customer expectations where the integrity of our products and services offer customers more value than they expect to receive. We achieve this through precision, quality, delivery, and cost effectiveness under the scope of continuous improvement. We work tirelessly to build on our history of product excellence and services to our world-wide customers. We provide work environments where our employees can meet their potential and thrive in an atmosphere of excellence. We have come to understand that we succeed because our customers and suppliers succeed.**

Mistequay expects suppliers to conduct business in accordance with the highest ethical standards. Mistequay's suppliers are an extension of the company and must not conduct business in a manner that could damage Mistequay's reputation or cause Mistequay to be in violation of any law or regulation.



## **LAWS, REGULATIONS AND CONTRACTS**

Our suppliers must act with honesty and integrity and in compliance with all applicable laws and regulations in doing business with government officials in any country, including personnel employed by government-controlled or state-owned enterprises. Suppliers must comply with all flow down terms, conditions, and other provisions specified in the Mistequay purchase order. When performing business outside of the United States, suppliers must comply with local laws and regulations.

## **ANTI-CORRUPTION**

We have a zero tolerance policy for corruption, and prohibit anyone conducting business on our behalf to engage in activities not in concurrence to our policy. Suppliers must use reasonable efforts to promote among their business partner's adherence to this Code of Conduct, and exercise due diligence to prevent and detect corruption in all business arrangements. Our suppliers must comply with the anti-corruption laws that govern operations in the countries in which they do business, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act.

## **GIFTS/BUSINESS COURTESIES**

We expect our suppliers in the offering or receipt of any gift or business courtesy not give or receive business gifts unless of nominal value and permitted by law, regulation and the rules and standards of the recipient's organization, and never in cash or cash equivalent. Suppliers should provide meals and entertainment to customers and others only if permitted by applicable laws and regulations, and, to the extent legally permissible, in a manner that is reasonable and customary, never lavish or inappropriate.

## **FAIR COMPETITION/ANTI-TRUST**

We expect our suppliers to conduct business in accordance with all applicable anti-trust or anti-competition laws and regulations. This includes avoiding engagement in anti-competitive behavior such as price-fixing, bid-rigging and other forms of illegal collusion by businesses.

## **CONFLICTS OF INTEREST**

We expect our suppliers to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with Mistequay. We expect our suppliers to report to Mistequay, any situations of potential or apparent conflicts between their personal interests and the interest of Mistequay.



## **COUNTERFEIT PARTS**

We expect our suppliers to supply Articles that are not and do not contain suspect/counterfeit parts. Suppliers must develop, implement, and maintain methods and processes appropriate to their products and services to minimize the risk of introducing counterfeit parts and materials into deliverable products.

## **EXPORT/IMPORT CONTROL**

We expect our suppliers be in compliance with the U.S. Export Administration Regulations and International Traffic in Arms Regulations, and any other laws implemented to enact and enforce global trade policies.

## **CONFLICT MINERALS**

We expect our suppliers to acknowledge many of our customers are subject to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act which will require reporting related to tin, tantalum, tungsten and gold (the "Conflict Minerals") contained in products

## **CONFIDENTIAL/PROPRIETARY INFORMATION**

Our suppliers should safeguard all sensitive information, including safeguarding proprietary and confidential information disclosed by Mistequay, physical property, drawings, technical data of Mistequay and its customers and employees which is in their care or possession, and use any such information only for the business purpose for which it was provided.

## **ACCURATE RECORDS**

We expect our suppliers to accurately record, maintain, and report business documentation, including but not limited to, quality reports, certifications, invoices, etc.

## **HUMAN RIGHTS**

We expect our suppliers to treat people with respect and dignity, encourage diversity and diverse opinions, promote equal opportunity for all, and help create an inclusive and ethical culture.

## **HUMAN TRAFFICKING**

We expect our suppliers to not engage in the use of forced labor, indentured labor, involuntary prison labor, or trafficking of persons. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation

## **CHILD LABOR**

We expect our suppliers to ensure that child labor is not used in the performance of work. The term “child” refers to any person under the minimum legal age for employment where the work is performed.

## **NON-DISCRIMINATION**

We expect our suppliers to provide equal employment opportunity to employees and applicants for employment without regard to race, ethnicity, religion, color, sex, age, military veteran status,

ancestry, sexual orientations, marital status, or disability.

## **ENVIRONMENT, EMPLOYEE, HEALTH & PRODUCT SAFETY**

Suppliers must protect the health, safety and welfare of those who may be affected by their activities by complying with all applicable environmental health and safety laws, regulations and directives. Suppliers must also ensure their contribution to product safety.

## **HARASSMENT**

We expect our suppliers to promote a safe, respectful and productive workplace by establishing and maintaining fair employment practices, including complying with laws that prohibit harassment.

## **DRUG-FREE WORKPLACE**

Our suppliers must maintain a safe and healthful workplace for their employees free of illegal drugs or controlled substances.

## **CODE OF CONDUCT**

With consideration to the size and nature of their business, we expect our suppliers to have management systems in place to support compliance with laws, regulations, and expectations related to or addressed within the Supplier Code of Conduct. We encourage our suppliers to implement their own written code of conduct, and to flow down the principles of a code of conduct to the entities that furnish goods and services to the supplier.

## **REPORTING**

Employees of our suppliers should have access to an adequate avenue for raising issues or concerns without fear of retaliation.