

Supplier Code of Conduct

Introduction

At Two Six Technologies, we provide innovative products that solve today's most complex real-world challenges. Through unrivaled collaboration and unwavering trust, we push the boundaries of what's possible to support our customers and empower our team.

In addressing the difficult problems, we shall reflect the values we uphold inwardly and externally, so we extend similar trust and clarity to our clients and suppliers – in communication, capability, and practice.

Compliance with the Supplier Code of Conduct

It is the policy of Two Six Technologies to maintain the highest ethical standards and to comply with all applicable laws, rules, and regulations.

This document expresses the expectations we hold for suppliers, subcontractors, and other third-party providers in support of the companies doing business as Two Six Technologies and subsidiaries.

We believe that adherence to this document will ensure continued success as well as earn and maintain the confidence of our customers and the communities in which we work.

Those who violate the principles set forth in this Code will be subject to disciplinary action such as ending of the business relationship and up to and including termination.

Overview

This document is in no way intended to conflict with or modify the terms and conditions of our contracts. In the event of a conflict, Suppliers shall first adhere to applicable laws and regulations, then the contract terms, followed by these expectations.

Legal and Regulatory Compliance Practices

Obligations

Suppliers shall comply with all applicable laws: legal regulations, directives, and guidelines, all obligations in the contracts, and compliance with Two Six Technologies requirements, which may exceed local legal requirements.

Anti-Corruption and Foreign Corrupt Practices Act

Suppliers shall strictly avoid any action that creates even the appearance of a potential violation of anti-bribery and anti-corruption laws, and shall comply with applicable laws and Foreign Corrupt Practices Act (FCPA).

Suppliers shall not give, offer, promise, or authorize giving money or valuables to employees or officials of government, employees or officials of public international organization, any political party or official or employee of such party, or any candidate for political office for the purpose of favorable action or influence.

Suppliers shall not be granted an expressed, implied, or apparent agency relationship with Two Six Technologies for the purpose of assisting in obtaining, retaining, or directing business to any person, firm, government, international organization, foreign political party to include both candidates and officials.

Suppliers shall not interact with a foreign government, political party, or public international organization on behalf of Two Six Technologies without prior written permission.

Suppliers who are found to be in violation could be subject to substantial criminal and/or civil fines, suspension or debarment from federal contracting, forfeiture of property, imprisonment, or any combination.

Suppliers shall proactively undertake due diligence and monitoring to prevent and detect corruption in all business arrangements.

International Compliance, Export Control, & Trade

Suppliers shall comply with laws and regulations applicable to the import and export of the items, including but not limited to trade laws and sanctions.

Suppliers shall not provide controlled technologies, products, or technical data without providing notice of such controls to maintain compliance with applicable laws.

Antitrust

Suppliers shall business in compliance with antitrust and fair competition laws that govern the business jurisdictions.

Insider Trading

Suppliers shall not use any information that is material, non-public information for trading or enabling others to trade.

Business Practices and Ethics

Representations & Certifications

Suppliers who prepare statements and certifications shall ensure that the representations are current, complete, and accurate. This requirement extends to both affirmative and implicit representations and certifications.

Press & Publicity

Suppliers shall only speak to the press on behalf of Two Six Technologies if expressly authorized in writing to do so by the appropriate representative, and Suppliers shall not issue press releases, advertisement, or publicity related to agreements without prior written consent.

Gifts & Entertainment

Suppliers shall avoid giving the perception that favorable treatment was sought, received, or given. Business courtesies including gifts, entertainment, or gratuities that lack transparency or a legitimate purpose may be viewed as bribes, create the appearance of conflict of interest, or perceived as improperly influencing decision making.

Conflicts of Interest

Suppliers shall avoid all conflicts of interest or situations including those that give the appearance of a potential conflict of interest.

Suppliers shall proactively identify scenarios that may create an Organizational Conflict of Interest.

Supplier Diversity

Suppliers shall promote minority-owned and -operated businesses in the supply chain and promote inclusive, diverse teams to generate economic opportunity for disadvantaged communities.

Fair Competition

Suppliers shall comply with fair competition and the Procurement Integrity Act, which prohibits the release of source selection and contractor bid or proposal information.

Human Rights and Fair Labor Practices

Employment Laws and Standards

Suppliers shall abide by applicable employment laws.

These laws may include, but not limited to regulations that prohibit discrimination against qualified individuals based on their status as protected veterans or individuals with disabilities and prohibit discrimination against all individuals based on their race, color, religion, sex, sexual orientation, gender identity, national origin, or for inquiring about, discussing, or disclosing information about compensation.

These laws may also include requirements for Suppliers to take affirmative action to employ and advance in employment individuals without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, disability or protected veteran status.

Suppliers are expected to pay their workers the minimum compensation required by applicable law and regulation and provide all legally mandated benefits in a timely manner. These shall be in full compliance regarding wages, benefits, and hours.

Human Trafficking and Forced Labor

Suppliers shall only engage workers with a legal right to work. Suppliers shall not use workers obtained through Human Trafficking, prison labor, Forced Labor or slave labor, or inflict any physical abuse or corporal punishment.

Child Labor

Child labor, those under the minimum legal age for employment where the work is performed, shall not be used under any circumstances.

Harassment and Abuse

Suppliers shall commit to and maintain employee environment that are free from harassment and abuse including but not limited to physical, verbal, and mental abuse, psychological harassment, mental and physical coercion, and sexual harassment.

Health and Safety

Emergency Preparedness and Business Continuity

Suppliers shall build a proactive process to prepare, prevent, and respond to potential emergencies that could negatively impact the supply chain or business operations.

Occupational Safety and Health

Suppliers shall ensure compliance with applicable occupational health and safety laws and regulations and provide a safe and healthy work environment for employees.

Suppliers shall maintain environments that are free from harassment and abuse.

Suppliers shall implement and enforce policies that prohibit employees from using, possessing, illegal drugs, alcohol, or other controlled substances, or misuse substances while performing job functions.

Environmental Protection and Compliance

Suppliers shall comply with all applicable environmental laws, regulations, permits, treaties, and reporting requirements. Suppliers shall aim to reduce carbon emissions, reduce water consumption, and minimize waste generation.

Suppliers shall identify chemicals, waste, and materials that may pose a threat to the environment. Suppliers shall be prepared to identify, monitor, and minimize Greenhouse Gas Emissions (GHG) in operations.

Conflict Minerals

Suppliers shall adhere to prohibition or restriction of specific substances and conflict minerals in manufacturing, products, or packaging per the contract.

Counterfeit Parts

Suppliers shall ensure the supply chain is secure from tampered or counterfeit parts.

Protecting Information

Physical and Intellectual Property

Suppliers shall have a system in place to enable proper and legal handling of sensitive information including confidential, proprietary, and personal information.

Suppliers shall comply with all laws governing intellectual property rights assertions including protection against disclosure, patents, copyrights, trademarks, and service marks.

Security and Privacy

Suppliers shall protect information generated or developed from cyber intrusions, unauthorized access, destruction, use, modification, or disclosure through appropriate physical and electronic security procedures.

Suppliers shall comply with applicable laws, regulatory requirements, and contractual requirements when accessing, collecting, storing, processing, disclosing, transferring, and sharing information.

Record Retention & Internal Business Information

Business records created, used, managed, or used with Two Six Technologies shall be retained in compliance with the applicable document retention policies and practices.

Unless otherwise specified, Two Six Technologies shall retain rights of ownership and control information created, managed, or used.

Adhering to the Code of Conduct

Whistleblower Protection

Suppliers shall promptly notify their Two Six Technologies contact, a member of Two Six Technologies management, or the contacts provided within if a situation develops that causes the Supplier to operate in violation of the Code of Conduct.

Two Six Technologies will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or violation.

Consequences for Violating Expectations

Suppliers shall cooperate by providing information, documents, and access as reasonably requested.

While Suppliers are expected to self-monitor and demonstrate compliance with the Code of Conduct, Two Six Technologies may need to audit Suppliers to confirm compliance.

Suppliers that behave in a way that is unlawful or does not follow the code of conduct may impact the business relationship including termination, and Two Six Technologies may be required to report violations to authorities.

Training

Suppliers shall ensure their employees and approved subcontractors understand and comply with the contents of the Supplier Code of Conduct, the applicable laws and regulations, and generally recognized standards.

Suppliers are encouraged to flow down the principles of the Code of Conduct and other requirements to suppliers they employ on behalf of Two Six Technologies.

Reporting Concerns

To report questionable behavior or a possible violation of the Two Six Technologies Supplier Code of Conduct, please contact our anonymous reporting hotline, Lighthouse:

- Website: www.lighthouse-services.com/twosixtech
- Toll-Free Telephone:
 - USA and Canada (English): 833-490-0007
 - USA and Canada (Spanish): 800-216-1288
- E-mail: reports@lighthouse-services.com (include "Two Six Tech" with report)
- Fax: 215-689-3885 (include "Two Six Tech" with report)