



Supplier Code of Conduct

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1.0 PURPOSE AND SCOPE

syncreon is committed to ensuring that working conditions in syncreon's supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally responsible. syncreon's suppliers ("Suppliers") commit, in all of their activities, to operate in full compliance with the laws, rules, and regulations of the countries in which they operate. This Supplier Code of Conduct ("Code") goes further, drawing upon internationally recognized standards, in order to advance social and environmental responsibility.

syncreon requires that Suppliers implement this Code using the management systems described below. Additionally, should any customer of syncreon require that syncreon comply with its code of conduct, then Suppliers must abide by such code(s) of conduct as well, a copy of which will be made available to Suppliers. syncreon may, taking into consideration applicable local laws, visit (and/or have external monitors visit) Supplier facilities, with or without notice, to assess compliance with this Code and to audit Supplier's wage, hour, payroll, and other worker records and practices. Violations of this Code may result in immediate termination as a syncreon Supplier and in legal action.

If under the terms of the contract which covers the services being provided to syncreon by Suppliers, any Suppliers are allowed to subcontract all or any portion of their services to third parties, Suppliers will ensure that they require their subcontractors to comply with the provisions of this Code and any applicable customer code(s) of conduct and provide the subcontractors with copies of the applicable Code/code(s) of conduct. Syncreon expects that its Suppliers will take any and all measures necessary to ensure that their subcontractors are in compliance with this Code and any applicable customer code(s) of conduct, including but not limited to audits of their processes, systems and recordkeeping activities.

The syncreon Supplier Code of Conduct is modeled on and contains language from the Electronic Industry Code of Conduct. Recognized standards such as the Universal Declaration of Human Rights (UDHR), and standards issued by organizations such as the International Labor Organization (ILO), Social Accountability International (SAI), and the Ethical Trading Initiative (ETI) were used as references in preparing this Code and may be useful sources of additional information. A complete list of references is provided at the end of this Code. As an extension of the Code, syncreon maintains a series of detailed Standards that clarify our expectations for compliance.

2.0 LABOR AND HUMAN RIGHTS

Suppliers must uphold the human rights of workers, and treat them with dignity and respect as understood by the international community.

2.1 Antidiscrimination

Suppliers shall not discriminate against any worker based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, or marital status in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline, and termination. Suppliers shall not require a pregnancy test or discriminate against pregnant workers except where required by laws or regulations or prudent for workplace safety. In addition, Suppliers shall not require workers or potential workers to undergo medical tests that could be used in a discriminatory way except where required by applicable laws or regulations or prudent for workplace safety.

2.2 Fair Treatment

Suppliers shall commit to a workplace free of harassment. Suppliers shall not threaten workers with or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, verbal abuse, or unreasonable restrictions on entering or exiting company-provided facilities. Suppliers shall prohibit harassment and unlawful discrimination in the workplace.

2.3 Prevention of Involuntary Labor and Human Trafficking

Suppliers shall not traffic in persons or use any form of slave, forced, bonded, indentured, or prison labor. This includes the transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. All work must be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment. Suppliers shall ensure that third-party agencies providing workers are compliant with the provisions of the Code and the laws of the sending and receiving countries, whichever is more stringent in its protection of workers. Suppliers shall ensure that contracts for both direct and contract workers clearly convey the conditions of employment in a language understood by the worker. Where workers are legally required to pay a fee in connection with obtaining employment, Suppliers shall be responsible for the full payment of such fees and expenses. Such fees and expenses include, but are not limited to; expenses associated with recruitment, processing, or placement of both direct and contract workers; for the purpose of clarity, individual workers will not be required to pay any such fees and/or expenses.

2.4 Prevention of Underage Labor

Child labor is strictly prohibited. Suppliers shall not employ children. The minimum age for employment or work shall be 15 years of age, the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher. This Code does not prohibit participation in legitimate workplace apprenticeship programs that are consistent with Article 6 of ILO Minimum Age Convention No. 138 or light work consistent with Article 7 of ILO Minimum Age Convention No. 138.

2.5 Juvenile Worker Protections

As long as in accordance with applicable local laws and regulations, Suppliers may employ juveniles who are older than the applicable legal minimum age for employment but are younger than 18 years of age, provided they do not perform work likely to jeopardize their health, safety, or morals, consistent with ILO Minimum Age Convention No. 138.

2.6 Working Hours

Except in emergency or unusual situations, a workweek shall be restricted to the maximum allowed under local laws and regulations, including overtime, and workers shall take at least one day off every seven days. All overtime shall be voluntary. Under no circumstances shall workweeks exceed the maximum permitted under applicable laws and regulations.

2.7 Wages and Benefits

Suppliers shall pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. In addition to their compensation for regular hours of work, workers shall be compensated for overtime hours at the premium rate required by applicable laws and regulations. Suppliers shall not use deductions from wages as a disciplinary measure. Suppliers shall offer vacation time, leave periods, and holidays consistent with applicable laws and regulations. Suppliers shall pay workers in a timely manner and clearly convey the basis on which workers are being paid.

2.8 Freedom of Association

Suppliers must respect the right of workers to associate freely with, form, and join workers' organizations of their own choosing, seek representation, and bargain collectively as permitted by and in accordance with applicable laws and regulations. Suppliers shall not discriminate with respect to employment subject to the condition that the worker relinquish union membership or agree not to join a union; or cause the dismissal of or otherwise prejudice a worker by reason of union membership or participation in union activities outside working hours (or within working hours if the Supplier has consented to such activities or if required by applicable laws or regulations). Suppliers shall protect against acts of interference with the establishment, functioning, or administration of workers' organizations in accordance with applicable laws and regulations.

3.0 HEALTH AND SAFETY

syncreon recognizes that integrating sound health and safety management practices into all aspects of business is essential to maintain high morale and produce innovative products. Suppliers shall commit to creating safe working conditions and a healthy work environment for all of their workers.

3.1 Occupational Injury Prevention

Suppliers shall eliminate physical hazards where possible. Where appropriate engineering controls such as physical guards, interlocks, and barriers. Where appropriate engineering controls are not possible, Suppliers shall establish appropriate administrative controls such as safe work procedures. In all cases, Suppliers shall provide workers with appropriate personal protective equipment. Workers shall not be disciplined for raising safety concerns and shall have the right to refuse unsafe working conditions without fear of reprisal until management adequately addresses their concerns.

3.2 Prevention of Chemical Exposure

Suppliers shall identify, evaluate, and control worker exposure to hazardous chemical, biological, and physical agents. Suppliers must eliminate chemical hazards where possible. Where chemical hazards cannot be eliminated, Suppliers shall provide appropriate engineering controls and/or appropriate administrative controls such as safe work procedures. In all cases, Suppliers shall provide workers with appropriate personal protective equipment.

3.3 Emergency Prevention, Preparedness, and Response

Suppliers shall anticipate, identify, and assess emergency situations and events and minimize their impact by implementing emergency plans and response procedures, including emergency reporting, worker notification and evacuation procedures, worker training and drills, appropriate first-aid supplies, appropriate fire detection and suppression equipment, adequate exit facilities, and recovery plans, Suppliers shall incorporate C-TPAT security criteria into their business processes as described in the U.S. Customs website, www.cbp.gov.

3.4 Occupational Safety Procedures and Systems

Suppliers shall establish procedures and systems to manage, track, and report occupational injury and illness. Such procedures and systems shall encourage worker reporting, classify and record injury and

3.4 Occupational Safety Procedures and Systems (cont.)

Illness cases investigate cases and implement corrective actions to eliminate their causes, provide necessary medical treatment, and facilitate the workers' return to work.

3.5 Ergonomics

Suppliers shall identify, evaluate, and control worker exposure to physically demanding tasks, including manual material handling, heavy lifting, prolonged standing, and highly repetitive or forceful assembly tasks.

3.6 Dormitory and Dining

Suppliers shall provide workers with clean toilet facilities, access to potable water, and sanitary food preparation and storage facilities. Worker dormitories provided by the Supplier or a third-party agency shall be clean and safe and provide adequate emergency egress, adequate heat and ventilation, reasonable personal space, and reasonable entry and exit privileges.

3.7 Health and Safety Communication

In order to foster a safe work environment, Suppliers shall provide workers with appropriate workplace health and safety information and training, including written health and safety information and warnings, in the primary language of the workers. Suppliers shall post, in the primary language of its workers, Material Safety Data Sheets for any hazardous or toxic substances used in the workplace, and properly train workers who will come into contact with such substances in the workplace.

3.8 Worker Health and Safety Committees

Suppliers are encouraged to initiate and support worker health and safety committees to enhance ongoing health and safety education and to encourage worker input regarding health and safety issues in the workplace.

4.0 ENVIRONMENTAL IMPACT

At syncreon, environmental considerations are an integral part of our business practices. Suppliers shall commit to reducing the environmental impact of their designs, manufacturing processes, and waste emissions.

4.1 Hazardous Substance Management and Restrictions

Suppliers shall comply with any applicable laws and regulations prohibiting or restricting the use or handling of specific substances. To ensure safe handling, movement, storage, recycling, reuse, and disposal, Suppliers shall identify and manage substances that pose a hazard if released to the environment and comply with applicable labeling laws and regulations for recycling and disposal.

4.2 Solid Waste Management

Suppliers shall manage and dispose of non-hazardous solid waste generated from operations as required by applicable laws and regulations.

4.3 Wastewater and Storm Water Management

Suppliers shall monitor, control, and treat wastewater generated from operations before discharge as required by applicable laws and regulations. Suppliers shall take appropriate precautions to prevent contamination of storm water runoff from their facilities.

4.4 Air Emissions Management

Suppliers shall characterize, monitor, control, and treat air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals, and combustion by-products generated from operations, as required by applicable laws and regulations, before discharge.

4.5 Environmental Permits and Reporting

Suppliers must obtain, maintain, and keep current all required environmental permits (for example, discharge monitoring) and registrations and follow the operational and reporting requirements of such permits.

4.6 Pollution Prevention and Resource Reduction

Suppliers must endeavor to reduce or eliminate solid waste, wastewater, and air emissions, including energy-related indirect air emissions, by implementing appropriate conservation measures in their production, maintenance, and facilities processes, and by recycling, reusing, or substituting materials.

5.0 ETHICS

Suppliers must be committed to the highest standards of ethical conduct when dealing with workers, suppliers, and customers.

5.1 Business Integrity

Corruption, extortion, and embezzlement, in any form, are strictly prohibited. Suppliers shall not violate the Foreign Corrupt Practices Act (FCPA), any international anti-corruption conventions, and applicable anti-corruption laws and regulations of the countries in which they operate, and shall not engage in corruption, extortion, or embezzlement in any form. Suppliers shall not offer or accept bribes or other means to obtain an undue or improper advantage. Suppliers must uphold fair business standards in advertising, sales, and competition.

5.2 Disclosure of Information

Suppliers must accurately record and disclose information as and to whom required regarding their business activities, structure, financial situation, and performance in accordance with applicable laws and regulations and prevailing industry practices.

5.3 Whistleblower Protection and Anonymous Complaints

Suppliers shall create programs to ensure the protection of Supplier and worker whistleblower confidentiality and prohibit retaliation against workers who participate in such programs in good faith or refuse an order that is in violation of the syncreon Supplier Code of Conduct. Suppliers shall provide an anonymous complaint mechanism for workers to report workplace grievances in accordance with local laws and regulations.

5.4 Community Engagement

Suppliers are encouraged to engage the community to help foster social and economic development and to contribute to the sustainability of the communities in which they operate.

5.5 Protection of Intellectual Property

Suppliers must respect intellectual property rights and safeguard customer information; transfer of technology and know-how must be done in a manner that protects intellectual property rights.

5.6 Fair Competition

In virtually all countries, laws prohibit relationships or arrangements with competitors, suppliers, distributors, or dealers that may interfere with competition in the marketplace. Such legal prohibitions apply to a wide range of activities, including price fixing, allocations of customers or sales territories between competitors, anti-competitive boycotts, and other unfair methods of competition. We are committed to fair competition and compliance with these laws.

6.0 MANAGEMENT COMMITMENT

Suppliers must adopt or establish a management system designed to ensure compliance with this Code and applicable laws and regulations; identify and mitigate related operational risks; and facilitate continuous improvement. ISO 14001, OHSAS 18001, and Eco-Management and Audit Scheme (EMAS) may be useful resources. The management commitment should contain the following elements:

6.1 Company Statement

A corporate social and environmental responsibility statement affirming the Supplier's commitment to compliance and continual improvement will be posted in the primary local language at all of the Supplier's worksites.

6.2 Management Accountability and Responsibility

Suppliers will clearly identify company representatives responsible for ensuring implementation and periodic review of the status of the Supplier's management systems.

- **Risk Assessment and Management** – A process to identify environmental, health and safety, business ethics, labor, human rights, and legal compliance risks associated with their operations; determine the relative significance of each risk; and implement appropriate procedures and physical controls to ensure compliance and control the identified risks. Risk assessments for health and safety must include warehouse and storage facilities, plant and facility support equipment, laboratories and test areas, bathrooms, kitchens, cafeterias, and worker housing.
- **Performance Objectives with Implementation Plans and Measures** – Written standards, performance objectives, targets, and implementation plans, including a periodic assessment of the Supplier's performance against those objectives.
- **Audits and Assessments** – Periodic self-evaluations to ensure that the Supplier, its subcontractors, and its next-tier Suppliers are complying with this Code and with applicable laws and regulations.

6.3 Documentation and Records

Supplier shall have processes to identify, monitor, and understand applicable laws and regulations and the additional requirements imposed by this Code. Supplier shall obtain, maintain, and keep current a valid business license as required by applicable laws and regulations.

Supplier shall have processes for creation of documents and records to ensure regulatory compliance and conformity to this Code, with appropriate confidentiality measures to protect privacy.

6.4 Training and Communication

Suppliers shall have programs in place for training managers and workers to implement their policies and procedures and to fulfill improvement objectives.

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Suppliers shall have a process for communicating clear and accurate information about their performance, practices, and expectations to its workers, suppliers, and customers.

6.5 Worker Feedback

Suppliers shall have an ongoing process to obtain feedback on processes and practices related to this Code and to foster continuous improvement.

6.6 Corrective Action Process

Supplier shall have a process for timely correction of any deficiencies identified by an internal or external audit, assessment, inspection, investigation, or review.

7.0 REFERENCES

syncreon consulted the following references in preparing this Code:

Eco-Management and Audit Scheme

www.quality.co.uk/emas.htm

Electronic Industry Code of Conduct

www.eicc.info/eicc_code.shtml

Ethical Trading Initiative

www.ethicaltrade.org

ILO Code of Practice in Safety and Health

www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf

ILO International Labor Standards

www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm

ISO 14001

www.iso.org

National Fire Protection Association

www.nfpa.org/categoryList.asp?categoryID=143&URL=About%20NFPA

OECD Guidelines for Multinational Enterprises

www.oecd.org

OHSAS 18001

www.bsi-global.com/index.xalter

SA 8000

www.cepaa.org/

SAI

www.sa-intl.org

United Nations Convention Against Corruption

www.unodc.org/unodc/en/corruption/index.html?ref=menuaside

United Nations Global Compact

www.unglobalcompact.org

Universal Declaration of Human Rights

www.un.org/Overview/rights.html

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UN Norms on the Responsibilities of Transnational Corporations and Other Business Enterprises with Regard to Human Rights www.ohchr.org

UK Modern Slavery Act 2015

<http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>



8.0 SUPPLIER ACKNOWLEDGEMENT RETURN SLIP

Please sign and return the acknowledgment slip provided below by E-Mail to <mailto:garry.nott@syncreon.com>, by doing this you agree to abide by the requirements and principles of this document.

ACKNOWLEDGEMENT RETURN SLIP

Company Name:	
Name:	
Position:	
Signature:	
Date:	