

This Supplier Code of Conduct defines the expectations regarding ethical business practices for all ControlTek's Suppliers. It is our hope that this code is accepted with the spirit it is intended and that the Supplier demonstrates acceptance and commitment by implementing practices that reflect the expectations. Failure to comply with these expectations may have an adverse effect on the business relationship.

Management Commitment

Suppliers are encouraged to establish quality management systems according to or significantly similar to ISO 9001 or an equivalent industry relevant third party recognized by an accredited standards organization. Further, Suppliers are encouraged to implement continuous improvement programs focused on eliminating waste in all areas where possible.

Business Ethics

Suppliers shall conduct business in an ethical manner in accordance with all applicable national and international laws, directives and regulations. The Supplier will engage in only legitimate, ethical and transparent business practices and record all business dealings accurately. The Supplier will adhere to all laws governing competitive practices, and will not engage in any kind of corruption, extortion, bribery or offering of extensive gifts or entertainment to ControlTek associates. Any potential conflict of interest must be promptly reported to ControlTek. The Supplier must also protect the intellectual property rights and any confidential information provided by ControlTek and its business partners with appropriate safeguards including programs that address cyber-security.

Human Rights

ControlTek expects its Suppliers to share its commitment to human rights and equal opportunity in the workplace. All ControlTek Suppliers must conduct their employment practices in full compliance with all applicable laws, regulations and fair labor practices. The Supplier will refrain from any harassment and discrimination which is based on race, color, age, gender, sexual orientation, ethnic origin, disability, pregnancy, religion, political affiliation, union membership, marital status or any other protected status in all employment practices. The Supplier will not use forced or child labor of any kind.

Health and Safety

Suppliers must provide and ensure a safe and healthy working environment for all of its employees. Suppliers should implement a health and safety policy and establish objectives to meet this policy. As a minimum, suppliers must ensure that their operations and processes comply with relevant standards and legislation.

ControlTek recognizes its social responsibility to protect the environment and expects its Suppliers to share its commitment by responding to challenges posed by climate changes and working toward protecting the environment. As a part of this commitment, all ControlTek's Suppliers are encouraged to:

- Comply with all applicable environmental laws and regulations regarding hazardous materials, air emissions, waste, and wastewater discharges, including the manufacture, transportation, storage, disposal, and release to the environment of such materials.
- Endeavor to reduce or eliminate waste of all types, including water and energy, by implementing appropriate conservation measures in their facilities, through their maintenance and production processes, and by recycling, re-using, or substituting materials where appropriate.
- Obtain, maintain, and keep current all required environmental permits and registrations and follow the operational and reporting requirements of such permits.