

Ethics and Compliance Policy

Code of Ethics

BSB Manufacturing Ltd. (BSB) requires all management and employees to abide by the fundamental principles of ethical behavior listed here in performing their duties.

1. Obeying the law – We respect and obey the laws, rules and regulations applying to our businesses around the world.
2. Integrity of recording and reporting our financial results – We properly maintain accurate and complete financial and other business records and communicate full, fair, accurate, timely and understandable financial results and other material information. We have developed a system of internal controls designed to preserve the integrity of our records and information.
3. Respecting human rights – We respect human rights and require our suppliers to do the same.
4. Delivering quality – We are committed to producing quality products and providing quality services
5. Competing ethically – We gain competitive advantage through superior performance. We do not engage in unethical or illegal trade practices.
6. Respecting diversity and fair employment practices – We are committed to respecting a culturally diverse workforce through practices that provide equal access and fair treatment to all employees based on merit. We do not tolerate harassment or discrimination in the workplace.
7. Avoiding conflicts of interest – We avoid relationships or conduct that might compromise judgment or create actual or apparent conflicts between our personal interests and our loyalty to BSB. We do not use our position with BSB to obtain improper benefits for others or ourselves. We do not engage in activities or enter into relationships that compete with BSB.
8. Protecting assets and information – We use BSB property, information and opportunities for BSB's business purposes and not for unauthorized use. We properly maintain the confidentiality of information and employee data entrusted to us by BSB or others.
9. Acting with integrity – We do not offer or accept bribes, kickbacks or inappropriate gifts or entertainment. We engage in business practices that are consistent with our ethics and values.
10. Selling to governments – We comply with the special laws, rules and regulations that relate to government contracts and relationships with government personnel.
11. Political contributions – Employees do not make contributions on behalf of BSB Manufacturing Ltd. to political candidates or parties, even where lawful.
12. Environment, health and safety – We are committed to being a leader in safeguarding the health and safety of our employees and protecting the environment.

Reporting – Subject to local law, any person may openly or anonymously report any ethical concern or potential or actual legal violation, including any accounting, financial, tax or anti-bribery matter, to any member of BSB Management.

Confidentiality will be maintained to the fullest extent possible while permitting an appropriate investigation.

BSB Manufacturing Ltd. will not permit retaliation against any employee who reports an ethical, legal or financial concern nor will it discipline any employee for making a report in good faith.

Personal responsibility

Every manager and employee has the personal responsibility to read, know and comply with the principles contained in this Code of Ethics. Subject to local law, compliance with these principles is a condition of employment, and failure to comply may result in discipline, up to and including termination.

The executive team will determine the actions to be taken in the event of violations of the Code of Ethics. These actions will be reasonably designed to deter wrongdoing and to promote accountability for adherence to the Code of Ethics.

Subject to local law, every employee has the duty to bring to the attention of BSB management any activity that in his or her judgment would violate these principles. Reports may be made to a supervisor or another member of management.

BSB Supplier Code of Conduct

BSB's Supplier Code of Conduct This Code sets forth minimum requirements of any entity providing goods or services to BSB (hereinafter a "Supplier"). These requirements are consistent with BSB's values and are applicable to all Suppliers and their respective affiliates and subsidiaries globally.

1. Compliance with Laws -Supplier shall always operate in full compliance with all applicable laws, rules and regulations (collectively "Laws").
2. Labor - Supplier shall uphold the human rights of workers and treat them with dignity and respect.
 - a. Supplier shall only employ or engage workers who meet the applicable minimum legal age requirement, except that in no event shall Supplier employ any person under the age of 16, even if local Laws permit otherwise. Notwithstanding the foregoing, Supplier may allow individuals aged 15 or older to work as part of a bona fide apprentice program. Such apprentice program must be approved under local Laws and be intended to provide instruction in one or more particular industrial disciplines as part of enrollment in an educational institution.
 - b. Supplier shall not use or engage in any indentured or forced labor, slavery or servitude, human trafficking or compulsory labor.

- a. Supplier shall set working hours, wages and over-time pay in compliance with all applicable Laws. Workers shall be paid at least the minimum legal wage or a wage that meets local industry standards, whichever is greater.
- b. Supplier shall employ workers based on their ability to do the job and treat them with dignity and respect and shall not engage in or permit corporal punishment or threatened or actual violence. Supplier shall not engage in any discrimination or harassment, whether based on gender, race, color, religion, ethnicity, social background, age, sexual orientation, national origin, disability, political conviction or any additional legally protected characteristics. e. Supplier shall respect employees' right to join or not join any lawful organization, including but not limited to trade unions and works councils, and shall comply with all applicable Laws pertaining to freedom of association and collective bargaining.

3. Health & Safety - BSB is committed to safeguarding the health and safety of employees, and contractors ("Personnel").

- a. Supplier shall comply with BSB's Safety Policy, BSB's EHS handbook, and any site-specific safety requirement or protocol while on-site at BSB.
- b. Supplier shall:
 - i. Take responsibility for the health and safety of its Personnel.
 - ii. Ensure a safe work environment and minimize physical and chemical hazards through proper design, engineering and administrative controls, preventative maintenance and safe work procedures as well as ongoing safety training.
 - iii. Provide workers with appropriate personal protective equipment where hazards cannot be adequately controlled by other means. iv. Provide and properly maintain physical guards, interlocks, and barriers where machinery presents a potential injury hazard to workers.
 - iv. Minimize the impact of emergency situations through the implementation of emergency plans and 2 response procedures.
 - v. Provide training and ensure that its Personnel are appropriately trained and educated in respect of health and safety matters.

4. Environment at BSB - environmental considerations are an integral part of our business practices.

- a. Supplier shall maintain all required environmental permits and registrations and follow the operational and reporting requirements of such permits.
- b. Supplier shall comply with regulated substance and product content specifications and with any applicable Laws prohibiting or restricting the use, content or handling of specific substances, including, but not limited to RoHS, WEEE, REACH, California Prop. 65 and other similar Laws. Supplier shall provide BSB any information relative to the foregoing, including, but not limited to, Material Declarations, as applicable.
- c. Supplier shall minimize environmental pollution and make continuous improvements to reduce or eliminate solid waste, wastewater and air emissions by implementing appropriate conservation measures in their production, maintenance,

and facility processes. d. Supplier shall manage, control, treat and/or dispose of non-hazardous solid waste, wastewater, and/or air emissions generated from operations as required by applicable Laws, before discharge.

5. Ethics and Compliance- Supplier shall commit to the highest standards of ethical conduct when dealing with its Personnel, suppliers, customers and other relevant stakeholders.

- a. Supplier shall accurately record and disclose information regarding its business activities, structure, financial situation, and performance in accordance with applicable Laws as well as prevailing industry business practices.
- b. Supplier shall prohibit any and all forms of fraud, extortion, theft or embezzlement by its Personnel.
- c. Supplier shall respect intellectual property rights and safeguard BSB information. Transfer of technology and know-how shall be done in a manner that protects intellectual property rights.
- d. Supplier shall implement processes and procedures and exercise due diligence to detect and avoid counterfeit parts.
- e. BSB is committed to ensuring that the products it sells do not incorporate “conflict minerals” (minerals which are smelted into tin, tantalum, tungsten and gold) sourced from entities which directly or indirectly finance conflict in the Democratic Republic of Congo or adjoining countries.

Supplier shall:

1. Perform sufficient due diligence into Supplier’s supply chains to determine whether products sold or provided to BSB contain tin, tantalum, tungsten or gold, and, if so, whether and to what extent those metals are sourced from conflict-free smelters;
2. Report to BSB the results of such due diligence to enable BSB to comply with its legal obligations and policy goals; and
3. Commit to being or becoming “conflict-free”, so that any such metals are sourced only from conflict-free smelters. f. Supplier shall implement processes to address the confidentiality and protection of an employee who in good faith raises a concern, makes a report, or assists with an investigation related to potential ethical or criminal violations.