

Policy brief & purpose

Our Code of Conduct outlines our expectations regarding our employees.

Our management style promotes freedom of expression and open communication. We expect all employees to follow our code of conduct. They should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well-organized, respectful and collaborative environment.

Our Code reflects who we are and what is important to us.

Scope

This policy applies to all our employees regardless of employment agreement or rank. We also expect nothing less from our business partners, including our consultants, distributors, co-manufacturers and suppliers, as well as our subsidiaries and joint venture partners.

Compliance with law

All employees must protect our company's legality. They should comply with all environmental, safety and fair dealing laws.

Employment Practices

A. Harassment

We ensure that our employees are afforded an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct.

B. Non-discrimination

We provide equal employment opportunity to employees and applicants for employment without discrimination.

C. Wage and Benefits

We pay workers at least the minimum compensation required by local law and provide all legally mandated benefits. In addition to payment for regular hours of work, workers eligible to be paid for overtime are provided the agreed contracted premium rate as is legally required.

D. Open Communication

Through positive leadership, create a workplace where employees feel comfortable coming forward with questions and concerns, and support them when they raise issues.

We encourage our employees to share their concerns, knowing that the business wants to hear them. Regardless of who they contact, they can be confident that they are doing the right thing and that their concern will be handled promptly and appropriately without rebuke.

By asking questions and reporting concerns they are aware that they supporting our company.

Anti-Corruption

A. Anti-Corruption Laws

We ensure that we comply with the anti-corruption laws, directives and regulations that govern operations in the countries in which they do business.

We exert reasonable due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of intermediaries such as agents or consultants.

B. Illegal Payments

We do not offer any illegal payments to, or receive any illegal payments from, any customer, supplier, their agents, representatives or others. The receipt, payment, and/or promise of sums of money or anything of value, directly or indirectly, intended to exert undue influence or improper advantage is prohibited. This prohibition applies even in locations where such activity may not violate local law.

C. Fraud and Deception

We do not seek to gain any advantage of any kind by acting fraudulently, deceiving people or making false claims, or allow anyone else to do so. This includes defrauding or stealing from the company, a customer or any third party, and any kind of misappropriation of property.

D. Competition and Anti-Trust

We do not fix prices or rig bids with our competitors. We will not exchange current, recent, or future pricing information with competitors. We also refrain from participating in a cartel

E. Gifts/Business Courtesies

We compete on the merits of our products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. In any business relationship, we ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, and that these exchanges do not violate the

rules and standards of the recipient's organization, and are consistent with reasonable marketplace customs and practices.

F. Insider Trading

We, and our employees, must not use any material or non-publicly disclosed information obtained in the course of their business relationship with external companies as the basis for trading or for enabling others to trade in the stock or securities of any company.

Conflict of interest

We avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. We provide notification to all affected parties in the event that an actual or potential conflict of interest arises

Global Trade Compliance

A. Import

We ensure that our business practices are in accordance with all applicable laws, directives and regulations governing the import of materials, parts, components, and technical data.

B. Export

We ensure that our business practices are in accordance with all applicable laws, directives and regulations governing the export of materials, parts, components, and technical data. We shall provide truthful and accurate information and obtain export licenses and/or consents where necessary.

C. Responsible Sourcing of Minerals

We comply with applicable laws and regulations regarding Conflict Minerals which include tin, tungsten, tantalum and gold. Additionally, we operate practices to reasonably assure that the tin, tungsten, tantalum and gold which may be contained within our products, do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses. We exercise, as may be directed by law, due diligence on the source and chain of custody of these minerals and therefore at a minimum require the same from their next tier suppliers.

D. Counterfeit Parts

We have developed, implement, and maintain effective methods and processes appropriate to our products to minimize the risk of introducing counterfeit parts and materials into deliverable products. In addition, we shall provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product.

Maintain Accurate Records

We create accurate records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. Records should be retained based on the applicable retention requirements.

Information Protection

A. Confidential/Proprietary Information

We shall properly handle sensitive information, including confidential, proprietary, and personal information. Information will not be used for any purpose (e.g. advertisement, publicity, and the like) other than the business purpose for which it was provided, unless there is prior authorization from the owner of the information.

B. Intellectual Property

We comply with all the applicable laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks.

C. Information Security

We protect the confidential and proprietary information of others, including personal information, from unauthorized access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures. We will comply with applicable data privacy laws.

Human Rights

We treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture, in accordance with the relevant International Labour laws

A. Child Labour

We ensure that illegal child labour is not used in the performance of our work. The term “child” refers to any person under the minimum legal age for employment where the work is performed provided the legal age is consistent with the minimum working ages defined by International labour laws.

B. Human Trafficking, including Forced or Indentured Labour

We adhere to regulations prohibiting human trafficking, and comply with all applicable local laws in the country or countries in which they operate. We refrain from violating the rights of others and address any adverse human rights impacts of our operations.

Environment, Health, and Safety

We establish an appropriate management system for Environment, Health and Safety.

We operate in a manner that actively manages risk, conserves natural resources and protects the environment in the communities within which they operate.

We protect the health, safety, and the welfare of our employees, contractors, visitors and others who may be affected by their activities.

We expect our suppliers to comply with all applicable environmental, health and workplace safety laws and regulations.

Open Communication

Through positive leadership, we create a workplace where employees feel comfortable coming forward with questions and concerns, and support them when they raise issues.

We encourage a 'SPEAK UP WITHOUT FEAR' policy.

Employees are able to share their concerns, knowing that the business wants to hear them. Regardless of who you contact, you can be confident that you are doing the right thing and that your concern will be handled promptly and appropriately without rebuke.

AMA Believe in Our Code of Conduct