

Supplier Responsibility

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Current version available on-line: www.tecnova.com/supply-chain

Tecnova Electronics, Inc. strives to perform to the highest level of Integrity and Ethics at all times. This expectation flows down to our suppliers. As such, we have the following expectations from our suppliers:

Non-discrimination – Tecnova expects our suppliers to provide equal employment opportunity to employees and applicants for employment without regard to race, ethnicity, religion, color, sex, national origin, age, military veteran status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information, or mental or physical disability, so long as the essential functions of the job can be performed with or without reasonable accommodation.

Anti-Harassment – Tecnova is committed to maintaining a workplace free from sexual harassment. Sexual harassment is a form of workplace discrimination. All suppliers are required to behave in a manner that prevents sexual harassment when onsite at Tecnova and in any business dealings outside of the workplace. This policy is part of Tecnova's commitment to a discrimination-free work environment.

Human Rights – Tecnova expects our suppliers to treat people with respect and dignity, encourage diversity and diverse opinions, promote equal opportunity for all, and help create an inclusive and ethical culture.

Human Trafficking – Tecnova's suppliers are not to engage in the use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation.

Child Labor – Tecnova's suppliers are to ensure that child labor is not used in the performance of work. The term "child" refers to any person under the minimum legal age for employment where the work is performed.

Reporting – Employees of our suppliers should have access to an adequate avenue of raising issues or concerns without fear of retaliation.

Codes of Conduct & Sub-tier Suppliers – Tecnova expects our suppliers to have management systems in place to support compliance with laws, regulations, and expectations related to or addressed expressly within the Supplier Responsibility. We encourage our suppliers to implement their own written document, and to flow down the principles of a Supplier Responsibility to the entities that furnish goods and services to the supplier.

Supplier Diversity – As supply chain requirements vary by country, our suppliers should be mindful that we often have customer-directed supplier inclusion goals that may necessitate use of in-country supply channel providers both by us and our suppliers. These may additionally be defined as small business, small disadvantaged business, woman owned small business, HUBZone-certified business, veteran owned business, service disabled veteran owned small business, or other.

Fair Competition/Anti-Trust – Tecnova expects our suppliers to conduct business in accordance with all applicable anti-trust or anti-competition laws and regulations. This includes avoiding business practices such as entry into arrangements that unlawfully restrain competition; improper exchange of competitive information; price fixing, bid rigging, or improper market allocation.

Conflicts of Interest – Tecnova expects our suppliers to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with Tecnova. We expect our suppliers to report to us any situations of potential or apparent conflicts between their personal interests and the interests of Tecnova.



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Conflict Minerals – Tecnova expects our suppliers to take steps to determine if their products contain conflict minerals (tin, tantalum, gold, and tungsten) and if so, implement supply chain due-diligence processes to identify sources of these minerals and support efforts to eradicate the use of conflict minerals which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries.

Environment – Tecnova expects our suppliers to operate in a manner that actively manages risk, conserves natural resources, and protects the environment. Furthermore, we expect our suppliers to be in full compliance with all environmental directives, such as REACH, ROHS, and California Proposition 65, where required.

Employee, Safety, & Health – Tecnova expects our suppliers to comply with applicable federal, state and local safety and health laws, regulations, policies, and procedures. Suppliers should provide for the health, safety, and welfare of their people, visitors, and others who may be affected by their activities.

Drug-Free Workplace – Tecnova expects our suppliers to maintain a workplace free from illegal drugs.

Legal and Contractual – Tecnova suppliers must, at a minimum, perform all duties and expectations in compliance with all laws and regulations applicable to their business. Suppliers must comply with all flow-down terms, conditions, and other provisions specified in Tecnova purchase orders. When performing international business, or if the primary place of business is outside of the United States, suppliers must comply with local laws and regulations.

Export/Import Control – Tecnova suppliers are to ensure that their business practices are in accordance with all applicable laws and regulations governing the export and import of domestic and foreign origin parts and components and related technical data.

Confidential/Proprietary Information – Tecnova suppliers should take proper care to protect all sensitive information, including confidential, proprietary, and personal information. Information should not be used for any purposes beyond the scope of the business arrangement with our company, without prior authorization.

Anti-Corruption – Tecnova has a zero-tolerance policy for corruption, and prohibits anyone conducting business on our behalf, including suppliers, from offering or making any improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons. This includes the offer and/or receipt of any bribe or kickback to and/or from any customer, supplier or others. Our suppliers must comply with the anti-corruption laws that govern operations in the countries in which they do business, such as the U.S. Foreign Corrupt Practices Act.

Financial Responsibility/Accurate Records – Tecnova expects our suppliers to accurately record, maintain, and report appropriate business documentation.

Gifts/Business Courtesies – Tecnova prohibits the offering or receipt of any gift or business courtesy, including cash and cash equivalents in order to gain a competitive advantage.