



Flexcon Company, Inc.

Supplier Code of Conduct

Introduction

At Flexcon, we are committed to conducting business with the highest standards of integrity, ethics, and sustainability. Our suppliers play a critical role in achieving these standards. This Supplier Code of Conduct ("Code") outlines our expectations regarding legal compliance, ethical business practices, labor and human rights, environmental stewardship, and management systems. We require all suppliers, contractors, and business partners to adhere to these principles to ensure a responsible and sustainable supply chain.

Flexcon Company, Inc.
compliance@flexcon.com



Applicability

This Code applies to all individuals and organizations that provide products, materials, or services to Flexcon Company, Inc., including their subcontractors and supply chain partners. Suppliers are responsible for communicating the requirements of this Code to all relevant parties involved in their operations. This Supplier Code of Conduct adopts and acknowledges all the elements and conditions of Flexcon's Terms of Purchase and Annual Supplier Certificate.

Our Values



Collaboration



Respect & Inclusion



Integrity



Entrepreneurship

1. Legal Compliance and Ethical Business Practices

1.1 Legal and Regulatory Compliance

Suppliers must comply with all applicable international, national, and local laws and regulations in the locations in which they operate and your relationship with Flexcon. In cases where this Code conflicts with applicable laws and regulations, suppliers should meet the higher standard.

1.2 Business Integrity and Anti-Corruption

Suppliers are expected to uphold the highest standards of ethics and integrity in all business interactions. Engaging in any form of bribery, corruption, extortion, embezzlement, or fraud is strictly prohibited. Suppliers must ensure that their business practices align with this zero-tolerance stance on corruption.

Compliance with Anti-Corruption Laws

Suppliers must comply with all applicable anti-corruption and anti-bribery laws and regulations when conducting business with Flexcon, such as the US Foreign Corrupt Practices Act and the UK Bribery Act. Suppliers are prohibited from directly or indirectly offering or accepting bribes, kickbacks, or other improper payments or things of value intended to secure or retain business or obtain any undue or improper advantage. Any actions to manipulate business outcomes through financial or other incentives are prohibited.

Gifts and hospitality extended to Flexcon employees by suppliers must always be lawful, nominal in value, not intended to influence or impact business decisions, and consistent with the Gifts and Contributions policy set forth in Flexcon's Code of Business Conduct & Ethics policy for its employees.

1.3 Conflict of Interest

Suppliers must avoid situations where personal or financial interests could conflict with their obligations to Flexcon. Each supplier must disclose all personal or family relationships with Flexcon, its related companies, and representatives to Flexcon's Legal Department or designated contact.

1.4 Fair Competition

Suppliers must conduct business in accordance with all applicable antitrust and competition laws. Activities that restrict or create unfair competition, such as price-fixing, the unauthorized sharing of proprietary information, bid rigging, deception, or unlawful market allocation, all of which are strictly prohibited.

1.5 Trade Compliance and Export Control

Compliance with Trade Laws

Suppliers must fully comply with all applicable laws and regulations governing the: import and export, reexport, and transfer of goods; economic and other trade sanctions and embargoes; and US antiboycott requirements.

Suppliers must not provide or source materials, products, or services: from countries, regions, and entities subject to trade sanctions; are provided by individuals or groups that are subject to trade sanctions; or transport materials or products on vessels or aircraft subject to trade sanctions. This prohibition includes entities that are owned fifty percent (50%) or more by one (1) or more sanctioned parties.

Suppliers are required to inform Flexcon if any products, services, or technologies they provide are subject to export or import control laws, regulations, or other requirements. This disclosure ensures that both parties can maintain compliance with applicable legal standards.

1.6 Intellectual Property; Confidentiality; Cybersecurity

Protection of Intellectual Property

Suppliers are required to respect and protect the intellectual property rights of Flexcon, as well as those of third-parties. Unauthorized use or distribution of any intellectual property, including patents, trademarks, copyrights, or trade secrets, is strictly prohibited.

Confidential Information

Suppliers must safeguard all confidential and proprietary information related to Flexcon. Such information should be handled with the utmost care and used solely for its intended purpose, ensuring it is protected against unauthorized access or disclosure.

Data Protection & Data Privacy

Suppliers must use reasonable measures to protect information that Flexcon provides, including complying with all applicable data protection and privacy laws and regulations and prevent unauthorized access or misuse.

2. Employment, Labor, and Human Rights

2.1 Fair Employment Practices

Non-Discrimination

Suppliers must provide equal employment opportunities and foster an inclusive work environment. Discrimination on the basis of race, color, age, gender, sexual orientation, gender identity and expression, ethnicity, disability, pregnancy, religion, political affiliation, union membership, veteran status, protected genetic information, or marital status is strictly prohibited. Suppliers are expected to uphold fair treatment and equality in all employment practices.

Respect and Dignity

Suppliers must ensure that all employees and contractors are treated with dignity and respect. Harassment, verbal, sexual and physical abuse, mental or physical coercion, bullying, public shaming intimidation, or any behavior that undermines the well-being of employees is strictly forbidden. Suppliers should cultivate a safe, respectful, and supportive workplace environment.

Suppliers, and any contractors and subcontractors it engages, should establish accessible and effective mechanisms for employees to report any concerns or grievances without fear of retaliation.

2.2 No Child Labor

Suppliers, and any contractors and subcontractors it engages, must fully comply with all applicable laws and regulations related to child labor. This commitment includes maintaining practices that prevent child exploitation and supporting a safe, age-appropriate environment for all employees.

Suppliers must ensure that they and any contractors and subcontractors they engage only employ individuals who are at least 15 years old or the legal working age, whichever is higher. Suppliers, and contractors and subcontractors they engage, are expected to verify the age of all employees and comply strictly with legal requirements regarding minimum working age.

2.3 No Forced Labor; Human Trafficking

Suppliers, and any contractors and subcontractors it engages, are strictly prohibited from using any form of forced, bonded, indentured, or involuntary prison labor. All labor must be freely chosen, and suppliers must ensure that all workers are employed under fair and voluntary conditions.

Employees must have the freedom to terminate their employment, without facing penalties or restrictions. Suppliers are responsible for ensuring that workers' rights to freely enter and leave employment freely are respected.

Suppliers, and any contractors and subcontractors it engages, must not engage in or support any form of human trafficking, slavery, or practices similar to slavery, including debt bondage, involuntary servitude, or the sale and trafficking of persons. Suppliers must ensure that recruitment processes are fair and transparent and that workers are not required to pay recruitment fees or surrender identification or work permit documents.

2.4 Commitment to Human Rights

Suppliers must respect and uphold internationally recognized human rights as outlined in the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. Suppliers are expected to treat all individuals with dignity and respect, ensuring that their operations do not contribute to human rights abuses.

2.5 Working Hours and Compensation

Legal Compliance

Suppliers are required to comply with all applicable wage and hour laws, including those related to minimum wages, overtime, legally mandated benefits and wages and must pay workers in a timely manner. Compliance with these regulations ensures that employees receive fair compensation and benefits in accordance with the law.

Working Hours; No Wage Deductions for Disciplinary Reasons

Suppliers should ensure that, except in extraordinary circumstances, workweeks do not exceed 60 hours, including overtime. Additionally, employees should be granted at least one day off every seven days to promote a balanced work environment.

Suppliers must not deduct wages as a form of punishment. Employees' wages should reflect fair compensation for their work and must not be adjusted for disciplinary reasons.

2.6 Freedom of Association and Collective Bargaining

Suppliers, and any contractors and subcontractors it engages, are required to respect employees' rights to freely associate, join labor unions, and engage in collective bargaining. These rights are fundamental to fostering an environment where workers can openly express and advocate for their interests without fear or retaliation.

2.7 Health and Safety

Safe Working Environment

Suppliers are required to provide a safe and healthy workplace for all employees, fully compliant with all applicable health and safety laws and regulations, and must implement safety programs designed to prevent accidents, injuries, and disease, including providing safety training and supplying appropriate protective equipment,.

Drug-Free Workplace

Suppliers, and any contractors and subcontractors it engages, must maintain a workplace that is free from the influence of illegal drugs, controlled substances, and alcohol to ensure a safe, healthy, and productive work environment.

3. Environmental Responsibility

3.1 Environmental Compliance

Suppliers are required to comply with all applicable environmental laws and regulations, including obtaining and maintaining all necessary environmental permits, approvals, licenses, and registrations. Adhering to these standards ensure that suppliers operate responsibly and contribute to environmental sustainability.

3.2 Resource Efficiency; Waste Handling

Conservation Efforts

Suppliers are encouraged to adopt practices that minimize waste, conserve energy and water, and reduce greenhouse gas emissions. By implementing conservation efforts, suppliers contribute positively to environmental sustainability and reduce their ecological footprint.

Hazardous Materials Management

Suppliers must identify, manage, and control chemicals and other materials that pose environmental risks. Proper handling, storage, and disposal of hazardous materials are essential to protect both the environment and public health.

3.3 Sustainable Practices

Suppliers are encouraged to develop and implement strategies to continually improve their environmental performance. Ongoing enhancement of environmental practices reflects a commitment to sustainability and responsible business operations.

Suppliers should consider environmental impacts at every stage of the product lifecycle, from design and production through to end-of-life disposal. By prioritizing product stewardship, suppliers can reduce ecological impact and support sustainable practices.

Flexcon Europe may request suppliers to share their reports related to the EU Corporate Sustainability Reporting Directive, EU Taxonomy Regulation, and the UK Environment Act 2021.

3.4 Conflict Minerals

Suppliers must comply with all applicable laws and regulations related to sourcing minerals, including, but not limited to, tin, tungsten, tantalum, gold, cobalt and mica, to support transparency and accountability in the supply chain.

Suppliers must exercise due diligence to ensure that products supplied to Flexcon do not contain conflict minerals that contribute to financing armed conflicts and supporting other illegal activities.

3.5 Community Engagement

Suppliers are expected to respect the rights and interests of local communities and indigenous peoples affected by their operations and engage with these communities in a manner that promotes mutual respect and understanding.

4. Management Systems

4.1 Commitment and Accountability

Senior Responsibility

To demonstrate commitment from leadership the importance of ethical standards and accountability, suppliers should designate a senior executive responsible for overseeing and ensuring compliance with the principles outlined in this Code.

Policy Development

Suppliers are required to establish policies and procedures that align with the principles of this Code and reflect a commitment to ethical practices to ensure that all aspects of the Code are effectively implemented and upheld.

Supply Chain Communication

Suppliers must communicate the principles outlined in this Code to their own suppliers and subcontractors to ensure that ethical and responsible practices are upheld across the supply chain, reinforcing a commitment to shared values.

4.2 Risk Management

Assessment Processes

Suppliers should implement assessment processes to identify and manage risks related to legal compliance, ethics, labor standards, health and safety, and environmental practices. Regular risk evaluation supports proactive management and strengthens responsible business practices.

Corrective Actions; Failure to Comply

Suppliers must promptly address any identified risks or violations of this Code and take timely, effective corrective actions to maintain compliance and continuously improve operational standards.

Suppliers are expected to uphold these principles to maintain a positive and sustainable partnership with Flexcon. Failure to comply with this Code may result in the cancellation of orders, termination of the business relationship, or both, as well as other actions available to Flexcon.

4.4 Documentation and Records

Suppliers must maintain accurate and complete records to demonstrate compliance with this Code and all applicable laws and regulations. Proper recordkeeping supports transparency and allows for effective verification of compliance with this Code.

5. Monitoring and Compliance

5.1 Audits and Assessments

Flexcon or its designated representative reserve the right to conduct announced and unannounced supplier facility audits to ensure compliance with this Code.

Suppliers are required to provide full access to their facilities, documents, and employees, as needed, for compliance verification purposes. Cooperation during audits is essential to maintaining a transparent and accountable relationship.

6. Reporting Concerns and Contact

Whistleblower Protection

Suppliers must establish a secure mechanism for employees to report any concerns or violations of this Code without fear of retaliation. Protecting whistleblowers is essential for maintaining an open and accountable work environment.

Reporting Channels

Suppliers should provide clear instructions for reporting concerns related to this Code, including contact information or a designated reporting mechanism for employees. This ensures that any issues can be effectively addressed and resolved.

Supplier and Supplier's employees can report concerns, breaches, or reach out for questions or guidance regarding the Supplier Code of Conduct at :

Flexcon Company, Inc.

Email: compliance@flexcon.com

Confidentiality

All reports made under this Code will be treated with strict confidentiality and investigated appropriately. Ensuring confidentiality encourages employees to come forward with concerns, fostering a culture of trust and integrity.

7. Acknowledgment and Acceptance

By engaging in business with Flexcon Company, Inc., the undersigned Supplier acknowledges and agrees to comply with this Supplier Code of Conduct. Suppliers are responsible for ensuring that their employees, representatives, contractors, and subcontractors understand and adhere to the principles outlined in this Code.

Name:

Title:

Company:

Date: ____/____/____

Signature:
