	Document Name: Supplier Code of Conduct 7/18/2023	Document Number: WTI-POL00007
		Revision 01

1. PURPOSE

1.1. Westfall Technik Code of Conduct:

1.1.1. The reputation of Westfall Technik and our customers are built on trust and respect. Our employees and those with whom we do business understand that we are committed to earning their trust with a set of values that represent the highest standards of quality, integrity, excellence, compliance with the law, and respect for human rights.

1.1.2. We conduct business responsibly and ethically. We respect international human rights principles, including the United Nations Declaration of Human Rights and the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work. We seek to improve the livelihoods of our customers and the environments within which we work.

1.2. Supplier Code of Conduct:

1.2.1. We believe that good corporate citizenship is essential to our long-term business success and must be reflected in our relationships and actions in our workplaces and the workplaces of those who are authorized to directly supply our business.

1.2.2. The principles outlined below reflect the values we uphold in our own policies, and we expect our direct suppliers to follow the spirit and intent of these principles to ensure compliance with applicable laws and regulations in which our supplier’s operate and respect for all human rights.

2. SCOPE


2.1. This policy extends to all Westfall Technik suppliers, who may have additional policies in place, aligned with these, to enhance functionality.

3. Principles

3.1. Business Integrity: Conduct business ethically, responsibly and with integrity. Provide products and services in a professional manner. Maintain accurate books and records, including quality, training, and finances.


3.2. Applicable Laws and Regulations: Operate in compliance with all applicable laws, and regulations of the countries, states, provinces, and localities in which it operates, including quality, labor, health safety, and environmental protection, and maintain and operate within all applicable permits and registrations.

3.3. Forbidden Materials: Prohibit purchasing or owning any materials that are legally forbidden. Additionally, do not knowingly purchase or produce any materials that are over material limits for the product’s intended use, as indicated by customers, defined in a customer product specification, supply agreement, quality agreement, or other binding contractual agreement.

	Document Name: Supplier Code of Conduct 7/18/2023	Document Number: WTI-POL00007
		Revision 01

These materials are in accordance with regulations including, but not limited to, REACH, RoHS, Conflict Minerals and California’s Proposition 65.

- 3.4.** Quality: Maintain a quality system to ensure the manufacture and supply of products conform to the specifications. Permit Westfall Technik to visit the facilities where services are performed, and products are manufactured and stored. Advise Westfall Technik in advance of implementing changes to the manufacturing location, manufacturing process, materials, suppliers, or specifications to a product.
- 3.5.** Freedom of Association and Collective Bargaining: Respect employees’ right to join, form, or not to join a labor union without fear of reprisal, intimidation, or harassment. Where employees are represented by a legally recognized union, establish a constructive dialogue with their freely chosen representatives and bargain in good faith with such representatives.
- 3.6.** Prevent Bribery and Corruption: Comply with anti-trust, anti-corruption, and anti-bribery laws. Prohibit offering or receiving anything of value including gifts, entertainment, and gratuities that may be perceived as a bribe or inappropriately influence the purchase or reward of business in dealings with government officials, whether provided directly or indirectly through a third party. Avoid conflicts of interest and act in an honest manner with all third-party organizations.
- 3.7.** Prohibit Child Labor: Adhere to minimum age provisions, hours, and type of work for child labor of applicable laws and regulations, including those set forth in the International Labour Organization Convention No.138 on Minimum Age and Convention No. 182 on Worst Forms of Child Labour.
- 3.8.** Prohibit Forced Labor and Abuse of Labor: Prohibit physical abuse of employees and the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, slave labor or any form of human trafficking.
- 3.9.** Responsible Sourcing: Conduct a country-of-origin inquiry for “conflict minerals,” including tin, tungsten, tantalum and gold, used in or for the manufacture of products to ensure the source of the materials are from conflict-free mines.
- 3.10.** Eliminate Discrimination: Maintain workplaces that are free from discrimination or physical or verbal harassment. The basis for recruitment, hiring, placement, training, compensation, and advancement should be qualifications, performance, skills, and experience.
- 3.11.** Promote Diversity: Value and embrace diversity during the recruitment process as well as in the workplace. Respect others without regard to race, color, religion, sex, national origin, age, disability, gender, sexual orientation, or political affiliation.
- 3.12.** Fair Work Hours and Wages: Operate in compliance with applicable wage, work hours, overtime, and benefits laws. Offer employees opportunities to develop their skills and capabilities and provide advancement opportunities where possible.
- 3.13.** Procedures and Training: Implement and maintain procedures and training to ensure compliance with applicable laws, rules and regulations, and respect for all human rights.
- 3.14.** Provide a Safe and Healthy Workplace: Provide a secure, safe, and healthy workplace to protect workers from the risk of accidents, injury, and exposure to workplace hazards, including

	Document Name: Supplier Code of Conduct 7/18/2023	Document Number: WTI-POL00007
		Revision 01

providing personal protective health equipment, safety information related to hazardous materials, and occupational health and safety training.

- 3.15. **Grievance Procedure and Remedy:** Provide workers with a mechanism to express grievances without fear of reprisal and ensure concerns are appropriately addressed in a timely manner. In the case of an employee of Westfall Technik has engaged in a potential illegal or improper conduct, report the matter to Westfall. This may be reported to the employee’s manager or to the HR department.
- 3.16. **Protect Privacy and Confidentiality:** Safeguard and make only authorized use and disclosure of the personal data and information and confidential information of employees, contractors, suppliers, and customers. Use and disclose personal data and information and other confidential information only with the express consent of Westfall Technik and in accordance with applicable laws and regulations. Maintain an information security system to protect the integrity and confidentiality of information, including the prevention of unauthorized disclosure, use or destruction. In the case of a data breach, provide notification to the individual and business impacted and report to the appropriate government agency if required by applicable law.
- 3.17. **Protect the Environment:** Conduct business in ways which protect and preserve the environment and in accordance with applicable environmental laws, rules, and regulations. Develop practices to improve and mitigate environmental impact.


4. Review and Communication

- 4.1. **Policy Review:** This policy is reviewed every other year. Next policy review to be conducted by the ESG Analyst July 2025.
- 4.2. **Policy Communication:** This policy will remain on the Westfall Technik website and ADP for internal and external access. Additionally, this policy will be communicated internally annually with each update.
- 4.3. **Revision History and Approval**

Rev.	Nature of changes	Written by	Approved by	Date
01	Initial release.	Madeleine Davis	Mark Gomulka Jeff Mackenzie David Schultz	07-18-2023

5. Acknowledgement

- 5.1. By certifying to the Westfall Technik Supplier Code of Conduct, you acknowledge that:
 - 5.1.1. You have read the entire code of conduct and understand your responsibilities related to it.
 - 5.1.2. You agree to abide by its principles.

	Document Name: Supplier Code of Conduct 7/18/2023	Document Number: WTI-POL00007
		Revision 01

5.1.3. You agree to report to Westfall Technik any violations of the code.

5.2. On behalf of [Company Name], I hereby certify that [Company Name] is adhering to and agrees to continue to uphold Westfall Technik’s Supplier Code of Conduct as stated above.

[Company Name]

By: _____

Name: _____

Title: _____

Date: _____