

	DAYTON PHOENIX GROUP SUPPLIER CODE OF CONDUCT	REVISION: 0 DATED: 12/17/2021
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1. SCOPE

The supplier code of conduct applies to all suppliers of Dayton Phoenix Group and all of its locations (collectively referred to herein as “DPG”).

2. POLICY STATEMENT

DPG is committed to integrity and compliance in everything we do. As part of that commitment, DPG expects its suppliers to ensure that they provide their employees a safe working environment, treat their workers with dignity and respect, engage in environmentally sound and sustainable manufacturing processes, and comply with the law in all countries in which they conduct business.

DPG’s Supplier Code of Conduct (the “Supplier Code”) sets forth DPG’s commitment to integrity and compliance within its global supply chain. We expect all of our suppliers to adhere to the Supplier Code and to ensure these requirements are met within their supply chain. DPG may visit (and/or have external monitors visit) supplier facilities, with or without notice, to assess compliance with the Supplier Code. Adherence to the requirements set forth in the Supplier Code will be considered in making sourcing decisions. Failure to comply with the Supplier Code may result in termination as a DPG supplier.

3. LABOR AND HUMAN RIGHTS

1. Fair Treatment

Suppliers shall commit to a workplace free of harassment and unlawful discrimination. Examples of conduct that could be characterized as “harassment” include, without limitation, threatening or subjecting workers with harsh or inhumane treatment, sexual harassment or abuse, corporal punishment, mental or physical coercion, verbal abuse, and unreasonable restrictions on entering or exiting company-provided facilities. Supplier shall commit to pay workforce minimum wages, have equal pay for women and men. Supplier will commit to not working employees’ excessive hours.

2. No Involuntary Labor or Human Trafficking

Suppliers shall not traffic in persons or use any form of slave, forced, bonded, indentured, or involuntary prison labor. This includes the transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

3. No Child Labor

Child labor is strictly prohibited. Suppliers shall not employ children. The minimum age for employment or work shall be 16 years of age, the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher. This Supplier Code does not prohibit participation in legitimate workplace apprenticeship programs.

4. Subcontractor Compliance

Suppliers agree that any workers supplied by subcontractors to work at the Supplier’s facilities will be treated in a manner consistent with the principles set forth in this Supplier Code. This is the Suppliers responsibility to verify subcontractor’s compliance.

4. ENVIRONMENTAL HEALTH AND SAFETY

Suppliers shall comply will all applicable health, safety and environmental laws and regulations. Suppliers should address the following in their environmental, health and safety programs.

1. Environmental

Suppliers shall comply with all applicable health, safety and environmental laws and regulations when conducting business. By way of example, suppliers shall: Identify, manage, store, move and handle hazardous substances in accordance with the law.

2. Occupational Safety

Suppliers shall commit to the safety and health of their employees and shall ensure that required training of personnel has been completed prior to initiating any work activity. Suppliers should have or subscribe to a written safety and health program. Suppliers are responsible for addressing and controlling worker exposure to potential safety hazards in conformance with all applicable standards and/or regulations.

3. Occupational Injury and Illness

Suppliers shall have procedures and systems to manage, track and report occupational injuries and illnesses.

5. INTEGRITY AND COMPLIANCE

1. Books and Records

Suppliers are expected to create and maintain accurate books and records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it.

2. Business Integrity

Suppliers shall comply with the laws and regulations of all applicable jurisdictions, including all applicable anticorruption laws. Suppliers will conduct their businesses without engaging in corrupt practices and will not take advantage of anyone through unfair dealing practices. This means that suppliers should not misrepresent the quality, features or availability of their products or service. Suppliers also agree to maintain integrity, transparency and accuracy in corporate record keeping.

3. Protection of Intellectual Property

Suppliers shall respect intellectual property rights and safeguard proprietary information. Transfer of technology and know-how shall be done in a manner that protects intellectual property rights.

4. Responsible Sourcing of Minerals

Suppliers shall have a policy to reasonably assure that the tantalum, tin, tungsten, and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available upon request.

5. Quality

Suppliers shall take due care to ensure their work product meets applicable quality standards. Supplier shall commit to employ a trained and skilled workforce. Suppliers shall put in place quality assurance processes to identify defects and implement corrective actions, and to facilitate the delivery of a product whose quality meets or exceeds DPG's requirements.

6. Privacy and Information Security

Suppliers shall protect confidential and proprietary information, including confidential and proprietary information of others and personal information, from unauthorized access, destruction, use, modification, and disclosure, through appropriate physical and electronics security procedures.