



## **CODE OF CONDUCT**

Alwin Manufacturing is committed to operating with honesty, integrity, and high ethical standards. This commitment will allow us to form trusting and sustainable relationships with our customers, suppliers and other employees. Alwin holds its employees accountable to the policies outlined in this Code of Ethical Conduct and expects that our suppliers operate under the same standards.

## **CHILD LABOR**

Suppliers shall not employ workers under the age of 14. Any worker under the age of 18 may not perform work that could jeopardize their health, safety or education.

## **FORCED LABOR**

Human trafficking, forced labor, involuntary labor or slave labor is prohibited. Our suppliers must be able to verify that materials included in their products comply with the slavery and human trafficking laws of the country or the countries in which they do business.

## **RIGHT TO ORGANIZE AND WORKPLACE FREEDOM**

Alwin believes that employees should have the right to decide whether they want collective bargaining or not, and that companies and unions should respect employees' decisions. We believe employees should have the right to say yes and the freedom to say no to union representation.

## **HEALTH & SAFETY**

A healthy and safe work environment is expected to be provided by our suppliers. A proactive approach should be taken that will help prevent accidents, injuries, and limit health risks.

## **DISCRIMINATION**

Suppliers are expected to support diversity and equal opportunity. Any discrimination against a job applicant or employee based on the person's race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information is prohibited.



## **HARASSMENT**

Suppliers must create and maintain a work environment in which people are treated with dignity, decency and respect. Workers may not be subject to corporal punishment, physical, sexual, psychological, or verbal harassment or abuse.

## **WORK HOURS, WAGES AND BENEFITS**

Suppliers must comply with applicable wage, hour, and labor laws & regulations.

## **ENVIRONMENTAL & SAFETY STANDARDS**

All suppliers must abide by all applicable environmental and safety laws, rules and regulations.

## **BUSINESS INTEGRITY**

Suppliers must comply with all applicable laws relating to bribery, corruption and money laundering. Suppliers and their employees are prohibited from giving, promising or offering anything of value to any person or government official to influence actions or obtain an improper advantage.

## **CONFLICT MINERALS**

Suppliers shall ensure that "conflict minerals" (tin, tantalum, tungsten or gold) are responsibly sourced from "conflict free" countries or mines and smelters and must promptly inform Alwin if any conflict minerals are included in components, parts or materials sold to or provided to Alwin Manufacturing that do not meet these requirements.

## **ANTICORRUPTION**

Alwin Manufacturing is committed to compliance with the principles and objectives of the U.S. Foreign Corrupt Practices Act (FCPA) and other, similar applicable laws. These laws prohibit or restrict the provision of payments of anything of value, directly or indirectly, to Government Officials, Customers, or political parties and require strict controls over the disposition and accounts of company assets. This policy applies to all suppliers of Alwin Manufacturing, its subsidiaries or affiliates in which Alwin Manufacturing directly or indirectly owns an interest.



## **RIGHT TO AUDIT**

Alwin Manufacturing reserves the right to audit supplier facilities with a 48 hour notice. Such audits will take place during supplier's normal business hours.