

COMPOSIFLEX CODE OF CONDUCT



Overview

Composiflex, Inc. is committed to being a responsible corporate citizen and upholding the highest standards of ethics and business conduct throughout its operations. Accordingly, Composiflex expects its suppliers and other business partners to conduct business consistent with these standards and in full compliance with applicable laws and regulations.

BUSINESS PARTNERS

This Composiflex Code of Conduct for Suppliers and Other Business Partners (the "Supplier Code") sets forth Composiflex's expectations for ethics and compliance within its global supply chain. The Supplier Code applies to any third party that directly or indirectly sells, or seeks to sell, any kind of goods or services to Composiflex or on Composiflex's behalf. As such, the Supplier Code applies to suppliers, subcontractors, distributors, dealers, sales and service representatives, consultants, intermediaries, and agents (collectively, "suppliers"). Composiflex expects all of its suppliers to adhere to the principles of the Supplier Code and to ensure that their directors, officers, employees, representatives, agents and business partners, as well as the suppliers within their supply chain, also adhere to the principles established by this Supplier Code. Upon request, suppliers will provide Composiflex with the information reasonably required to enable Composiflex to confirm their compliance and the compliance of their sub-tier suppliers, with this Supplier Code.

RELATIONSHIP TO CONTRACTUAL TERMS

This Supplier Code shall in no way conflict with or modify the provisions of any existing contract. Unless otherwise agreed in such a contract, suppliers shall comply with the provisions of the contract in the event of a conflict with this Supplier Code.

FAIR EMPLOYMENT PRACTICES

Suppliers must establish and maintain fair employment practices, including providing equal opportunity in employment regardless of race, color, religion, national and ethnic origin, sex (including pregnancy), sexual orientation, gender identity and expression, age, marital status, handicap, disability, genetic information, status as a veteran, military service or obligation and other characteristics protected by law.

Composiflex also expects suppliers to ensure that their employees are afforded an employment environment that is free from physical, psychological, sexual and verbal harassment, intimidation or other abusive conduct.

EMPLOYEE HEALTH AND SAFETY

Suppliers must protect the health, safety and welfare of those who may be affected by their activities by complying with all applicable environmental and health and safety laws, regulations and directives. Suppliers must maintain a safe and healthful workplace for their employees free of illegal drugs or controlled substances. Further, we expect our suppliers to dutifully report any workplace injuries and/or death to federal and/or state agencies as required by the Occupational Safety and Health Act or state equivalent regulation.

FREEDOM OF ASSOCIATION

Composiflex expects suppliers to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal. Composiflex expects suppliers to recognize and respect the right of workers to exercise lawful rights of free association, including joining or not joining any Works Council, union or worker's association of their choosing.

COMPLIANCE WITH LAWS

At a minimum, suppliers must maintain full compliance with all laws and regulations applicable to the operation of the supplier's business and laws and regulations that govern the supplier's relationship with Composiflex, including the local laws and regulations outside their home country in which operations are located or services are being provided.

FORCED LABOR, CHILD LABOR, AND HUMAN TRAFFICKING

Suppliers must not engage in the use of illegal child labor or obtaining labor or services through coercion, physical threats or restraints, withholding of passports, identity or immigration documents, the use of false or misleading recruitment practices, or other forced labor practices or human trafficking activities.

All supplier employees must be free to terminate their employment after reasonable notice and to receive all owed compensation.



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ANTI-CORRUPTION LAWS

Composiflex has a zero-tolerance policy for corruption, and its suppliers must comply with the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act and other applicable anti-corruption laws and regulations that govern operations in the countries in which they do business of local customs. We expect our suppliers to use due diligence to prevent and detect corruption in all business arrangements. Suppliers therefore must:

- Never offer, pay or accept bribes, kickbacks or other improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons to obtain an undue or improper advantage, including facilitation payments to speed up the performance of a function or activity to which the supplier is legally entitled (for example, the release of goods held in customs at a port or the issuance of permits or licenses); this prohibition applies even in locations where such activity may not violate local law or custom;
- Only provide or accept favors, gifts, gratuities, meals, entertainment, travel or other business courtesies (collectively "hospitality") to the extent legally permitted by the laws, regulations and policies that govern the conduct of the recipient and consistent with reasonable marketplace customs and practices and never lavish or inappropriate;
- Never give or accept gifts of cash (or cash equivalents such as prepaid credit or debit cards);
- Not engage in anti-competitive behavior such as price-fixing, bid-rigging and other forms of illegal collusion; and
- Not engage in other deceptive or unfair market practices, whether on Composiflex's behalf, the supplier's behalf or on behalf of others, and never make misrepresentation regarding Composiflex's products or services, the supplier's products or services, or the products or services of others.

WORKING HOURS, WAGES AND BENEFITS

Suppliers must ensure compliance with all applicable laws related to working hours and overtime requirements. Suppliers must pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits.

EMPLOYEE COMPLIANCE

Suppliers must make their employees aware of the expectations of this Supplier Code and provide their employees with avenues for raising legal or ethical concerns without fear of retaliation, including opportunities for anonymous reporting.

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.

HUMAN RIGHTS

All Suppliers are expected to share in, and abide by, Composiflex's commitment to human rights set forth in the *Composiflex Human Rights Commitment*.

CONFLICT OF INTEREST

Suppliers must avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with Composiflex. Conflicts of interest can arise when personal or financial interests interfere or appear to interfere with a person's ability to make objective business decisions or perform their duties without bias.

This applies to a conflict between the interests of our company and the personal interests of those working on our behalf, or their close relatives, friends, or associates. Suppliers must provide immediate notification to all parties in the event that an actual or potential conflict of interest arises.



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ACCEPTANCE OF CODE OF CONDUCT

If you agree and abide by Composiflex's Code of Conduct please check the boxes below, acknowledge and return this document to the buyer.

☐ By checking this box you acknowledge that you have received a copy of Composiflex's Code of conduct.

☐ By checking this box you agree to comply.

Name of Company

Print Authorized Name

Authorized Signature

Date

Please return this form to the buyer at Mark.Signorino@composiflex.com



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Nadcap Accredited Composites
ISO 9001 Accredited
AS9100 Accredited

Composiflex has been an innovator in the design and manufacture of advanced high-performance composites. Specializing in custom designs, Composiflex currently serves the medical, military, aerospace, ballistic protection, industrial and recreational markets. Composiflex conducts operations in Erie, PA, USA.