

# CTDI SUPPLIER CODE OF CONDUCT

revision April 2022

Communications Test Design, Inc. (CTDI) and its subsidiaries conduct business consistent with our long-established corporate values. These values include providing exceptional service to our customers and operating with the highest standards of quality while valuing our employees and making a positive contribution to the communities in which we conduct business. Our commitment to fulfilling our social responsibilities is an extension of the way we do business and adds value to our corporation. This Supplier Code of Conduct provides our employees, customers, and suppliers with a clear understanding of our standards for business conduct and fair business practice.

CTDI policy is to select suppliers who are leaders in their industries and are willing to demonstrate along with our company a strong commitment to sustainable development by adopting health & safety, labor, environmental, and ethical principles that protect the well-being of their employees and their human rights. Consistent with the application of CTDI's sustainability principles, this Supplier Code of Conduct outlines the company's expectations in regard to the sustainability practices of its suppliers. By adopting this Supplier Code of Conduct, CTDI aims to promote sustainable development, protect human rights, and prevent any abuse that would also create legal, financial and reputation risks to CTDI and its customers.

The CTDI Supplier Code of Conduct outlines standards to ensure that working conditions in the supply chain are safe, that workers are treated with respect and dignity, and that design and manufacturing processes are environmentally responsible. In all their activities, suppliers must conduct business in full compliance with the laws, rules, and regulations of the countries in which they operate. Suppliers are encouraged to go beyond legal compliance, drawing upon internationally recognized standards – listed in this document – to advance social and environmental responsibilities. When the country's laws and international standards address the same issues, we expect that the highest standards be applied. Suppliers are expected to take all reasonable measures to ensure the respect of this Code across their entire business and within their supply chains.

## A- MANAGEMENT CONTROL

Suppliers must have in place the appropriate control measures to monitor compliance with this Code and to promptly correct any non-compliance. Where appropriate, Suppliers should establish a management system whose scope is in line with the principles of this Code and in accordance with international standards such as ISO 14001, ILO-OSH 2001 and SA8001. The management system should be designed to ensure (a) compliance with applicable laws, regulations and customer requirements related to the supplier's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also be focused on continuous improvement. The management system may contain elements such as company commitment and policy towards corporate social and environmental responsibilities; identification of the management accountability and responsibility; performance objectives with implementation plan and measures; training programs; compliance assessment; documentation and records; etc.

## B- LABOR AND HUMAN RIGHTS

Suppliers are expected to uphold the human rights of workers, and to treat them with dignity and respect in compliance with internationally accepted standards as defined in the International Labor Organization (ILO) conventions and regional or national legislation governing working conditions.

### Freely Chosen Employment

Workers shall not be required to lodge 'deposits' or identity papers with the company. All work should be

voluntary, and workers should be free to leave after reasonable notice.

### **Child Labor Avoidance**

There shall be no use of child labor in production or anywhere else in the business. The term “child” refers to any person employed under the age of 15 (or 14 where the laws of the country permit), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of workplace apprenticeship programs, which comply with all laws and regulations, is encouraged. Workers under the age of 18 shall not be employed at night or in hazardous conditions.

### **Working Hours, Wages and Benefits**

Suppliers will manage operations in ways that overtime does not exceed levels that create inhumane working conditions. Where there are no applicable laws, Suppliers will not require, on a regularly scheduled basis, work in excess of six consecutive days without a rest day.

Suppliers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Where no wage law exists, workers must be paid at least the minimum local industry standard.

### **Non-Discrimination**

Suppliers shall be committed to provide a workplace free of harassment and unlawful discrimination. Suppliers shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or civil status in hiring and employment practices such as promotions, rewards, and access to training.

### **Freedom of Association and collective bargaining**

Suppliers shall respect the rights of workers to freely join labor unions, seek representation and join workers’ councils in accordance with local laws, and to bargain collectively.

## **C- BUSINESS CONDUCT AND ETHICS**

### **Business Integrity**

Suppliers shall maintain the highest standards of corporate ethics and integrity and shall comply with all applicable federal, provincial, state, and local laws, regulations, and procedures. Any form of corruption, extortion, embezzlement, or falsification is prohibited.

### **No Improper Advantage – Business Courtesies**

Suppliers shall not offer or solicit any gifts, gratuities, entertainment, travel, payments of cash or loans or any other kind of undue favor or use other inappropriate means of influence to gain competitive advantage or create the appearance of competitive advantage – nor is acceptance of anything beyond a nominal value of \$150 USD allowed. Suppliers should not offer any gift, entertainment, or travel to any CTDI employee who plays a role in the decision while a Request of Information, Request for Proposal or contract negotiations are underway.

### **Intellectual Property**

Suppliers shall respect intellectual property rights and comply with all applicable legislation pertaining to intellectual property rights.

### **Fair Business, Advertising and Competition**

Suppliers shall comply with all applicable legislation relating to fair business practices, anti-trust standards, and lawful advertising.

### **International Business**

CTDI and its Suppliers must adhere to all laws, rules, and regulations applicable to international business transactions. Various U.S. laws apply to activities outside of the United States, including:

- Anti-corruption laws;
- Anti-boycott requirements;
- Anti-money laundering laws;
- Controls on exports and re-exports of products, technology, and software.
- Customs and import regulations; and
- Economic trade sanctions and embargoes.

When representing CTDI or performing work for CTDI outside of the United States, we expect Suppliers to be aware of and comply with all applicable laws and regulations.

### **Responsible Sourcing of Materials**

Suppliers shall exercise due diligence on relevant materials in their supply chains. Supplier shall develop particular due diligence policies and management systems in order to identify applicable risks and take appropriate steps to mitigate them. Due diligence shall be conducted to the material processing level in order to determine whether relevant materials originate from regions with high risks, which include areas associated with conflict, worst forms of child labor, forced labor and human trafficking, gross human rights violations such as widespread sexual violence, or other reasonably objective high-risk activities, including severe health and safety risks, as well as negative environmental impacts.

Suppliers shall develop an appropriate management system to conduct due diligence in accordance with the standards set out in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the “OECD Guidance”) and other applicable international standards, as described in this Standard

### **Supplier Diversity**

CTDI believes competitive strength is achieved through a diverse group of people working together to find the best solutions and we are committed to providing procurement opportunities to women, minorities, service-disabled veterans, and small businesses through the CTDI Supplier Diversity Program. A diverse Supply Chain is a stronger Supply Chain.

### **Privacy**

Unless disclosure is authorized or legally mandated (for example by court order), Suppliers should protect the confidentiality of employee and customer information in compliance with applicable privacy legislation, irrespective of whether the information and data were provided by the employee or customer or was created by the Supplier. Suppliers should consider all non-public information to be confidential.

### **Community Engagement**

Suppliers are invited to engage in the community to help foster social and economic development.

## **D- HEALTH and SAFETY**

**Legislation** Suppliers are expected to comply with the international, regional, and national health and safety standards applicable to the Suppliers’ business activities. Suppliers must comply with all applicable health and safety legislation and all applicable regulations and perform all services in a diligent manner in respect of health and safety matters.

Suppliers must ensure that their employees and any person present on or near the workplace are protected against potential occupational health and safety hazards resulting from the Suppliers' business activities. Where appropriate, the Suppliers shall ensure that their employees are provided with adequate personal protective equipment, with adequate training on the safe use of tools and equipment and shall supervise

employees' adherence to safe working practices.

Suppliers shall ensure that all products supplied to CTDI or used on CTDI premises are in compliance with all applicable workplace hazardous materials information standards. Material Safety Data Sheets must be available in for all controlled products supplied to CTDI or used on CTDI premises.

### **Policies and practices**

We expect our suppliers to provide their employees with a healthy and safe working environment and where appropriate to implement and train their employees on policies, programs, and procedures to address when required, in particular but not limited to, the following matters:

- Exposure to hazardous substances
- Accident prevention
- Confined Space Entry
- Aerial Work
- Ergonomics
- Resiliency and Emergency procedures

## **E- ENVIRONMENT**

### **Legislation**

Suppliers must comply with all applicable statutes, regulations, guidelines, codes of practices, orders from and agreements entered with government authorities relating to the protection and conservation of the environment, including the use, handling, storage, transportation, and disposal of regulated hazardous substances.

Suppliers must obtain, maintain, and report on all environmental permits, approvals, licenses, and registration as required under environmental legislation.

### **Policies and practices**

We expect our suppliers to have knowledge of the environmental impacts associated with their business activities and where appropriate to implement policies, programs, and employee training to address, but not limited to, the following matters:

- hazardous products management
- accidental spills and releases
- air emissions and waste water control
- waste management and waste recycling

Suppliers should consider a commitment to reduce greenhouse gas emissions and find ways to utilize renewable energy. These efforts may be bolstered by environmentally responsible building practices, "green" IT, waste reduction efforts, e-billing practices, environmentally beneficial products and services, and a strong environmental employee-engagement program.

## **F- SUPPLIER ASSESSMENT AND MONITORING**

CTDI reserves the right to assess and monitor on an ongoing basis the supplier's practices regarding this Code.

The supplier may be requested by CTDI to complete a self-assessment questionnaire.

CTDI or a third party designated by CTDI may conduct onsite audits of selected supplier facilities which provide products or services to CTDI. Onsite audits may include a review of relevant supplier records, policies, and work practices as well as inspection of the facilities for compliance with this Code.

In case of observed noncompliance with this Code, Supplier will take all reasonable measures to meet the standards exposed in this Code in a diligent manner.

## **REFERENCES**

The following documents were consulted in preparing this Code and may be a useful source of additional information.

### **International Instruments**

Universal Declaration of Human Rights

ILO International Labor Standards

Guidelines on occupational safety and health management systems: ILO-OSH 2001

United Nations Convention Against Corruption

### **International Best Practices and Voluntary Standards**

Eco Management & Audit System

EICC (Electronic Industry Code of Conduct)

Ethical Trading Initiative

ISO 14001

OECD Guidelines for Multinational Enterprises

SAI (SA8000)

United Nations Global Compact

Revision History:

April 2022

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