

Supplier Code of Conduct

Why do we have a Code of Conduct?



“Integrity - It’s not just a word at WPG Americas, it is a lifestyle”

WPG Americas Inc. has worked to cultivate a culture of integrity that allows us to develop strong relationships with customer, suppliers, co-workers, government agencies and the communities in which we do business.

When selecting business partners, WPG Americas selects partners we can develop mutually productive and respectful long-term relationships with. Integrity, ethics, a respect for statutory/regulatory requirements and mutual cooperation are at the core of this relationship so we can best serve our customers and maintain good standing in the industries we work with.

WPG Americas Inc. holds itself to a high standard, as expressed in our internal code of conduct, and expects our business partners to cooperate in this effort by complying with the requirements of this Supplier Code of Conduct as a minimum standard.

This code may change from time to time and suppliers will be notified when changes occur to ensure ongoing communication.

Please review to familiarize yourself with the requirements and feel free to reach out if you have any questions or concerns so we can work through them together in a cooperative fashion.

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Supply Chain Approach

As a business partner to WPG Americas, we trust that you appreciate the importance of business being conducted in a legal and ethical manner at all levels of the supply chain. Therefore, the contents of this supplier code of conduct are expected to be flowed to all sub-tier suppliers and/or subcontractors associated with material and/or services provided to WPG Americas so we can work to address issues and improve performance together.

Compliance / Violations

Violations of the requirements established in this Code of Conduct, depending on severity, may result in a request for corrective action through to termination of the business relationship, in accordance with applicable laws, regulations and legal agreements on file.

RBA (Responsible Business Alliance) Code of Conduct / Applicable Laws and Regulations

Suppliers are encouraged to incorporate the practices in the RBA (Responsible Business Alliance) Code of Conduct but are, at minimum, required to comply with all applicable Labor, Health & Safety, Ethics and Environmental regulations and laws for the countries in which they do business.



Compliance with Laws, Rules and Regulations

This Code of Conduct is not an exhaustive list of applicable requirements or regulations. Business partners are expected to perform their own internal risk assessment to assure they are, at minimum, meeting all laws, rules and/or regulatory requirements for the countries/areas in which they do business.

Suppliers are expected to maintain appropriate management systems to prevent violations and provide information upon request to enable WPG America or its customers maintain compliance.

If a supplier finds a violation has occurred that has the potential to impact WPG Americas or its customers, they are expected to notify WPG Americas in a timely manner and cooperate in any associated investigation.

Import and Export Regulations

Suppliers are expected to comply with applicable import and export regulations for the countries in which they do business and provide due diligence information, as requested from WPG Americas to confirm compliance.

Import/Export due diligence data is subject to government audit and the supplier agrees that, in the event of a government audit, WPG Americas may provide due diligence information to a legal government entity for auditing purposes without notice.

Due Diligence or Verification Activities

As a distributor, WPG Americas depends on the cooperation of suppliers to provide due diligence and/or verification information.

Due diligence/verification requests can include regulatory classification (ECCN or HTS codes, for example), product specific information (REACH, RoHS, Conflict Minerals, California Prop 65, etc.), PPAP requests, general company certification or compliance information or any other area of inquiry required by WPG Americas or our customers to confirm compliance to a particular law, rule or requirement.

It is expected that suppliers will respond to due diligence requests in a timely and accurate manner. If an inquiry is not able to be answered, or if an additional cost is associated with the response, the supplier is expected to communicate effectively with WPG Americas so the information can be reviewed internally or provided to a customer for review in a timely manner.

Business Records

Suppliers are expected to generate and maintain records to ensure regulatory compliance and conformance to WPG Americas or customer requirements. This includes, but is not limited to, financial records, product test data, due diligence information, transactional records, etc. to demonstrate compliance with regulatory or contractual requirements.

Records are to be maintained in a manner ensures they are protected and retrievable in a timely manner. Information in records must be accurate, complete and legible.

Upon request, records are expected to be made available to WPG Americas, in agreement with contractual agreement or applicable law.

Confidentiality / Intellectual Property

In the course of normal business, our business partners may, at times, have access to confidential information or intellectual property related/belonging to WPG Americas or its customers. Suppliers must ensure that effective systems/processes are in place to protect confidential information and intellectual property from unintended release and must not release or misuse this information or property without prior written authorization from WPG Americas.

Company / Customer Property

Suppliers may, at times, have possession of physical material belonging to WPG Americas or one of our customers. The supplier must have processes implemented to identify, segregate and protect this material and notify WPG Americas in the event this material is damaged or lost.



Conflicts of Interest

The corporate image and business reputation of WPG Americas within the industry, the market, and the community is largely dependent on cooperation from our whole supply chain.

Suppliers must avoid any situation that may involve a conflict or the appearance of conflict or impropriety between WPG Americas and their financial interests, either as a business or personally.

Any activity or relationship between a supplier and WPG Americas employee that causes a conflict or the appearance of a conflict must be disclosed to WPG Americas as soon as the issue is known.

Human Rights

Suppliers shall protect the human rights of all workers and ensure that all employees are treated with fairness, respect and dignity, without fear of retaliation for participating in legally protected activities.

Suppliers shall refrain from harsh or inhumane treatment of workers, including but not limited to, verbal or physical abuse, harassment of any kind, corporal or financial punishment, mental/physical coercion, physical restriction or threats of retribution.

Suppliers shall ensure that none of the services or raw materials associated with its products finance or support, directly or indirectly, individuals, groups or companies that violate human rights in any way.

Lawful Workers

Suppliers shall employ only lawful workers and have a review process in place to ensure an individual's legal status to work before employment.

Zero Tolerance Policy Regarding Forced Labor and Trafficking in Persons

WPG Americas respects the rights of all people and does not engage in or tolerate human trafficking, indentured servitude, child labor, slave labor or any other type of forced or coerced labor.

Suppliers are expected to confirm that employees are working of their own free will and are able to separate from employment at will. No forced labor of any kind is acceptable to WPG Americas.

Suppliers shall ensure that no person is employed at an age younger than legally authorized for employment based on applicable regulations in the country of employment. Child labor at any stage of the supply chain will not be tolerated.

Working Hours / Minimum Wage

Suppliers shall comply with applicable laws and regulations related to maximum working hours, employee leave, time off and minimum wage in the area in which the supplier operates.

Collective Bargaining / Freedom of Association

Suppliers shall ensure that workers are free to associate and collectively bargain per applicable regulations.



Anti-Harassment

Suppliers are expected to provide a work environment free from harassment. This includes sexual harassment and harassment on the basis of age, gender, gender identity, gender expression, race, ancestry, color, religion, national origin, disability, marital status, military and/or veteran status, sexual orientation, transgender status, genetic characteristics or any other characteristic protected under applicable law.

Anti-Discrimination

WPG Americas will not tolerate discrimination against any supplier applicant, employee, contractor, intern or volunteer based on age, sex, gender, gender identity, gender expression, race, ancestry, color, religion, national origin, physical disability, mental disability, medical condition, marital status, military and/or veteran status, sexual orientation, transgender status, genetic characteristics or any other characteristic protected by applicable law.

Gifts and Entertainment

Entertaining business partners or exchanging gifts is a common way to build relationships and show appreciation, however, the value of the gift or entertainment must be reasonable.

WPG Americas employees cannot give or receive gifts or offers of entertainment that are excessive (above common norms) or intended to directly impact a business decision. This can create the appearance of unfair trade practices, bribery or a conflict of interest, which must be avoided.

We expect our business partners to respect this requirement and ask in advance if you are unsure that the value of any gift or entertainment would be considered excessive.

Anti-Bribery and Corruption

WPG Americas is committed to implementing a high standard of corporate governance and expects all business partners to embrace the same value.

Suppliers are expected to be in full compliance with the U.S. Foreign Corrupt Practices Acts (FCPA) and any of the applicable local anti-bribery and corruption laws of the countries in which they do business.

WPGA has a zero-tolerance policy for bribery and corruption. The principles that WPGA strongly advocate include:

- To carry out business fairly, honestly, openly and ethically.
- To prohibit bribery and corruption in any form, whether direct or indirect.
- To ensure all of our business stakeholders understand and adhere to our anti-bribery and corruption policy.

Antitrust and Fair Competition

Antitrust and competition laws are in place to protect markets from deceptive activities, such as price fixing, rigged bids or agreeing to allocate customers, markets or territories with competitors in order to unfairly eliminate competition.

At WPG Americas, we work closely with our business partners to outperform any competition but will do so in a fair and honest manner. Therefore, we require that all business partners comply with applicable fair competition and antitrust laws that are applicable in the areas in which we do business.

Money Laundering

Suppliers are required to maintain compliance with all applicable anti-money laundering laws and regulations and take steps to prevent being used by others to launder money.

Insider Trading

In the course of normal business, you may learn of non-public (insider) information about WPG or other companies that would be considered advantageous for an investor to have when deciding to buy, hold or sell that company's stock or other securities. This information must be kept confidential.

Suppliers and supplier employees are prohibited from using this information for personal financial gain or sharing the information with others.



Cybersecurity

Suppliers shall maintain a security infrastructure and provide security awareness throughout their organization that safeguards their IT systems.

Breaches that have the potential to impact WPG Americas, directly or indirectly, must be reported immediately once they are discovered.



Safety and Health of Employee

Suppliers shall comply with all applicable laws and regulations relating to the health and safety of employees and takes measures necessary to ensure a work environment that maintains workers physical and mental health.

Emergency preparedness plans must be on file with employees properly trained as risks are identified, per applicable laws and regulations.

Conflict Minerals / Extended Material Reporting

Suppliers are expected to adhere with applicable laws and regulations related to conflict minerals (example – Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502) and provide reporting, as requested, to verify compliance, using the most recent version of the RMI (Responsible Minerals Initiative) Conflict Minerals Reporting Template, available at <https://www.responsiblemineralsinitiative.org/reporting-templates/cmrt/>.

Suppliers are encouraged to report due diligence information related to the sourcing of cobalt and mica using the RMI

Environmental Sustainability

WPG Americas cares about our environment. We are committed to identifying and implementing sustainability practices that protect our environment and minimize our contribution to climate change.

Suppliers are required to adhere to all applicable laws regarding environmental sustainability.

We also encourage suppliers to proactively improve environmental performance by implementing programs to reduce their impact on the environment (examples are energy conservation, waste reduction or recycling programs).

Extended Minerals Reporting Template, available at <https://www.responsiblemineralsinitiative.org/facilities-lists/indicators/>.

Suppliers are expected to avoid using non-compliant smelters in their supply chain and take actions to correct if an existing smelter is found to no longer be compliant, as indicated on the RMI Indicators and Facility List by metal at <https://www.responsiblemineralsinitiative.org/facilities-lists/indicators/>.

Anti-Counterfeit

WPG Americas, Inc. has developed a robust Anti-Counterfeit Program to protect ourselves, our customers and our suppliers from the impact of counterfeit material being introduced into the supply chain.

Suppliers must have an effective anti-counterfeit program implemented to ensure the potential for counterfeit material entering the supply chain is minimized and respond to counterfeit alert inquiries with accurate and timely information, as applicable.

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