



# SUPPLIER CODE OF CONDUCT

Effective January 1, 2021

**SI Group**<sup>®</sup>  
The Substance Inside

# INTRODUCTION

SI Group is aware of its corporate responsibility towards the people, communities, and environment wherein we and our suppliers do business. We support a sustainable development policy and the conduct of our people and suppliers is a crucial part of that policy. The conduct of our supplier network is part of our organizational Code of Conduct and is governed by our business integrity policy as well as our company ethics standards.

We define suppliers as the companies and individuals that manufacture, trade, or deliver services to the Company or our clients by means of consulting outsourced services, or distribution of products. The Supplier Code of Conduct sets out the guidelines for these business partners so that all interactions can be monitored and reviewed for improvement.

This Supplier Code of Conduct is used in conjunction with SI Group's Global Code of Conduct. All Third Parties must comply with this Code in all aspects of their dealings with, or on behalf of SI Group. To that end, SI Group expects suppliers to implement effective systems and controls that will promote compliance and foster a culture that values ethics and integrity in business dealings.



# 1. SCOPE OF SUPPLIER CODE OF CONDUCT

- 1.1** The Code of Conduct as prescribed in this document pertains to any and all companies and individuals that fall within the definition of a supplier as set out in this document. This includes organizations that are operating as an extension of SI Group under legal authority as service providers to the Company. The Code of Conduct is not limited by jurisdiction or region but does not supersede any regulations or laws that might be in effect within these regions. SI Group expects that suppliers apply this Code of Conduct to their businesses and enact similar policies to their own supplier network.



## **2. LEGAL AND REGULATORY COMPLIANCE**

- 2.1** Suppliers and service providers of SI Group shall conduct their business operations according to the laws and regulations that are in place in their regions, jurisdictions, or countries while they are supplying to SI Group. These obligations will be after the laws and legislature of their jurisdiction but will not be limited to the following:
- 2.2** Suppliers shall conduct their business with strict compliance to anti-bribery and anti-corruption laws within the countries of operation. These laws include but are not limited to the Combating of Corrupt Activities Act, United States Foreign Corrupt Practices Act, the UK Anti Bribery Act and any other such legislation in the country of your business operations. Under no circumstance should you make illegal payments directly or indirectly to any government or corporate officials to illicit the abuse of his/her position to obtain or retain contractual business from said organizations.
- 2.3** Suppliers shall conduct their business in full compliance with any anti-trust or fair competition regulation in place within your jurisdiction of business operations.
- 2.4** Suppliers shall conduct their business in full compliance with environmental laws and statutes when it comes to the handling of hazardous material, air emissions, waste products, or wastewater discharge. This includes the transportation, storage, disposal, and release of these waste products and materials into the environment.
- 2.5** Suppliers shall conduct their business in an honest and transparent manner with any agency or government officials at all times.
- 2.6** Suppliers shall not engage in any misappropriation of confidential information, price fixing, bid rigging or collusive conduct in connection with any transaction involving SI Group. Suppliers are expected to understand and comply with all applicable laws regarding fair competition and antitrust.
- 2.7** Suppliers shall not source tin, tantalum, tungsten or gold (the “Conflict Minerals”) from the Democratic Republic of the Congo or the adjoining countries (the “Covered Countries”) in a manner which directly or indirectly finances or benefits armed groups in the Covered Countries. Supplier will abide by all applicable laws and regulations related to source tin, tantalum, tungsten or gold (the “Conflict Minerals”) and agrees to provide all necessary information requested by the Company concerning products supplied by the supplier to enable the Company to complete its reasonable country of origin inquiries and due diligence with respect to Conflict Minerals. Suppliers shall have policies and programs to reasonably ensure that their activities and/or the activities of their suppliers do not benefit perpetrators of human rights abuses in the Democratic Republic of the Congo or in adjoining countries.

### 3. MONITORING AND REVIEW

- 3.1** SI Group has a focused supplier relationship management process in place that assists with the selection, monitoring, and evaluation of the supply chain network. This system is based on a risk-based methodology to determine compliance with this Code of Conduct. This methodology is also in line with the country or jurisdiction in which the suppliers are conducting the business.
- 3.2** Each supplier will be evaluated according to this risk-based process before business operations will be entered between the Company and Supplier. SI Group will also be conducting regular assessments to review the status of each supplier to maintain a high standard of the business relationship between all parties.
- 3.3** The assessments will be conducted using a self-test questionnaire as well as further in-depth evaluations if it is required. These in-depth assessments will be conducted as and when the Company deems it necessary. If any non-compliance is found, we will direct the supplier on which corrective actions need to be taken to ensure compliance and continuation of the business relationship.
- 3.4** If any non-compliance is brought to the attention to the Company through any other means, we reserve the right to conduct independent investigations to determine the validity on a case by case basis. This does not limit our statutory or contractual rights in any way.



## **4. STANDARD BUSINESS PRACTICES**

- 4.1** The suppliers, vendors, and employees of the Company will at all times conduct their business with integrity and in compliance with any and all agreements with the Company. Furthermore, suppliers will do the following:
- 4.2** Accurately record all business transactions and information and comply with the relative laws and regulations pertaining to the recording and storage of this information.
- 4.3** Maintain accurate records both created and stored in compliance with the regulation pertaining to financial record keeping in your jurisdiction. Responsibly act on behalf of the Company when you are dealing with clients and other suppliers to protect the data and assets of the Company as well as intellectual property.
- 4.4** Use Company technology and systems for authorized business interactions with clients and providers. It is strictly prohibited to use SI Group technology and systems to create, access, send, print, store or solicit any abusive, sexually explicit, or any offensive material that is deemed inappropriate. The production of false, derogatory, or malicious communications by means of the Company technology or systems is strictly prohibited.
- 4.5** Maintain security to protect the intellectual property rights of the Company which includes but is not limited to copyrights, patents, trademarks, or trade secrets. Any usage of software, hardware, or content, electronic or otherwise must comply with the specific terms of the license agreements associated with them.
- 4.6** At all times use good judgment when entertaining SI Group employees. The giving of gifts or entertainment must comply with the SI Group's Global Code of Conduct so as not to breach the ethical standards of the Company. At no time shall a supplier offer any bribes, kickbacks, or any type of barter for business or incentive to any employee of the Company.
- 4.7** Maintain proper business relationships. SI Group will not conduct business with the supplier where a conflict of interest exists. If the supplier has an actual or potential conflict of interest, it must be reported to SI Group for review and approval before engaging in any business activities. This policy extends to contract negotiations prior to a business relationship being initiated. Potential conflicts of interest may arise, for example, where a supplier's family member is employed by SI Group.
- 4.8** Respect the intellectual property rights of the Company and third parties, including any patents, trademarks, copyrights, and trade secrets. The supplier shall not provide the Company with any products, services, or materials that infringe or otherwise misappropriate any intellectual property rights or confidential information of third parties.

## 5. EMPLOYMENT PRACTICES

- 5.1** The Company maintains a high standard when it comes to human rights and equal opportunity within the workplace. We require our suppliers to comply with this standard in their employment policies as well as keep in line with the current laws and regulations within their jurisdictions. The following aspects will gain special attention but will not be limited to these aspects:
- 5.2** Ensure that the workplace is free of harassment and unlawful discrimination. We will at all times be focused on creating and maintaining a work environment that does not include hiring discrimination, inequality of compensation, access to training and promotion, wrongful termination or retirement based on age, religion, disability, gender, marital status, sexual orientation, or union memberships as well as political views or legally protected categories.
- 5.3** Comply with the relative employment regulations as stipulated in the country of business legislation.
- 5.4** Maintain a safe work environment that promotes mental and physical health and complies with all relevant health and safety regulations. This will include any usage of Company premises and the interactions with any people authorized to access the property.
- 5.5** Prohibit the use of forced labor in any facilities or properties associated with the business operations of the Company.
- 5.6** Comply with the local minimum working age and at no time be a party to child labor practices or exploitive labor practices.
- 5.7** Maintain clear written employment information for all employees that define remuneration, deductions, and terms of employment. This employment documentation should also clearly define the disciplinary actions and procedures that will govern the interactions between employer and employee.
- 5.8** Maintain proper employee records in accordance with local regulations and legislation.



## 6. SUSTAINABILITY

- 6.1** The Company believes in living up to a high standard of social responsibility and sustainability. We are constantly striving to live up to our stewardship of the environment and this is extended to all our suppliers and their business practices. The Company and Supplier will at all times work on finding better ways of fulfilling the commitment to the environment and business sustainability.

## 7. CODE OF CONDUCT COMPLIANCE

- 7.1** It is the responsibility of the supplier and its company officers to ensure that all employees and its representatives comply with this Code of Conduct. Any potential violation of this Code must be reported to the Company's Compliance or Legal Departments or the Living Our Values Reporting Portal. In the event of a violation, the Company reserves the right to request the removal of persons or persons that committed the transgression, and in this regard, the Company reserves the right to conduct audits to evaluate the compliance at its discretion.
- 7.2** Furthermore, in the event of a violation, the Company may disqualify any potential supplier or terminate any agreement, purchase order, or relationship with a current supplier that has failed to conform to this Code of Conduct.







[www.siigroup.com](http://www.siigroup.com)

**SI Group, Inc.**

Corporate Headquarters  
1790 Hughes Landing Blvd.,  
Suite 600  
The Woodlands, TX 77380, U.S.A.  
Tel: +1 518.347.4200

The information presented herein is believed to be accurate and reliable, but is presented without guarantee or responsibility on the part of SI Group, Inc. and its subsidiaries to ensure the accuracy or reliability of the information. It is the responsibility of the user to comply with all applicable laws and regulations and to provide for a safe workplace. The user should consider all information contained herein only as a guide, and should take precautions that the user considers necessary or prudent to promote a safe work environment, such as considering all applicable health and safety hazards, developing safe work practice procedures and properly instructing employees. Further, nothing contained herein shall be taken as an inducement or recommendation to manufacture or use any of the materials or processes mentioned herein in violation of existing or pending patents.

©2022 SI GROUP, INC. ALL RIGHTS RESERVED.