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**Purpose:**

**SAMTEC IS COMMITTED** to conducting business across the globe by respecting local customs and practices while requiring our Associates and our agents, service providers, Suppliers, and their subcontractors (collectively “Suppliers”) to abide by applicable laws and socially and environmentally conscious practices. The standards stated herein have been committed to by SAMTEC and supported by its Associates. We expect our Suppliers to meet these Standards as well with their own business activities and in relation to their employees. Our Standards shall be maintained by the policies outlined.

1. [\*\*Certification Policies\*\*](#)
2. [\*\*Samtec General Practices & Policies\*\*](#)
3. [\*\*Ethics Policies\*\*](#)
4. [\*\*Social Responsibility Policies\*\*](#)
5. [\*\*Country Specific Policies\*\*](#)

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## **1. Certification Policies**

### **Quality Policy**

SAMTEC accepts responsibility for the complete satisfaction of its customers. We exercise this responsibility through adequate training of associates, adherence to proven procedures, appropriate quality objectives, total commitment to meeting and exceeding customer requirements, and through maintaining an organizational culture that fosters continual improvement on the effectiveness of the quality management system.

### **Environmental Policy Statement**

Samtec is committed to conducting business in a manner that will preserve and protect the environment. This commitment includes the following objectives:

- Complying with environmental laws and other agreed upon requirements
- Promoting the prevention of pollution
- Conserving natural resources
- Recycling materials
- Reducing waste
- Appropriate environmental objectives

These objectives are to ensure a safe and secure environment for our customers, associates and the community through an Environmental Management System (EMS) that is continually improving.

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## **2. Samtec General Practices & Policies**

***(In accordance with the California Transparency in Supply Chains Act)***

**Compliance.** SAMTEC is committed to complying with all applicable laws, rules, and regulations, at all times, wherever we operate. SAMTEC requires its Suppliers to do the same.

**Verification.** SAMTEC requires Suppliers to provide information regarding their own suppliers and subcontractors to verify that the extended supply chain related to SAMTEC products operates in a manner consistent with SAMTEC's expected code of conduct and commitment to its environmental and social principles.

**Audits.** SAMTEC has a regular audit schedule of its Supplier base, which must allow SAMTEC and its agents (including third parties) to engage in assessment activities to confirm compliance with these Standards.

**Accountability.** SAMTEC reserves the right, when the Standards are not met and/or corrected in a timely fashion, to cancel outstanding orders, suspend future orders or terminate its relationship with the Supplier, as circumstances demand.

**Training.** We train our Associates to use these standards in our own operations and in evaluating our Suppliers. If SAMTEC determines through audits or otherwise that a Supplier is not meeting the requirements and expectations set forth in these Standards, SAMTEC will offer guidance with respect to matters requiring correction or that need improvement if the facts allow.

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### **3. Compliance and Ethics Policies**

SAMTEC is committed to the highest standards of ethical conduct. We expect our Associates and our Suppliers to support the following principles:

- Strive on a daily basis to conduct affairs in an ethical and honest manner.
- Comply fully with all applicable laws and regulations.
- Question whenever a situation appears that could yield actions in conflict with SAMTEC's Policies.
- Report actions that may violate these Policies to SAMTEC management, the General Counsel or the confidential Ethics Report Email (ethics.report@samtec.com).

#### **International Trade Compliance**

SAMTEC is committed to complying with all laws and regulations governing the import, export and transfer of goods, data, and services in all countries where we do business. This includes all U.S. export controls and trade sanctions, such as the International Traffic in Arms Regulations (ITAR), Export Administration Regulations (EAR), and U.S. economic sanctions administered by the Department of Treasury, Office of Foreign Assets Control (OFAC). SAMTEC will not engage in any transaction involving an embargoed or sanctioned country, or any party that is subject to a debarment or is the target of economic sanctions. Further, because of the complexity of certain sanction regimes, we will not do business, directly or indirectly, with Russia, Kazakhstan, or Belarus. Samtec strives to go above and beyond in establishing a secure supply chain. Together with U.S. Customs and Border Protection (CBP), Samtec voluntarily participates in Customs Trade Partnership Against Terrorism (C-TPAT), supporting security efforts globally.

#### **Anti-Corruption**

SAMTEC requires all of its Associates and Suppliers to conduct business in an Ethical manner and to abide by the laws of the countries where we do business. This includes avoiding any type of corruption. Associates and Suppliers (directly or through third parties) shall not offer or receive payment or gifts from or to customers with the intent of taking improper advantage or to influence decisions (the same policy applies to any other items meant to intimidate and/or influence decisions). SAMTEC Associates will comply with the limitations of the Foreign Corrupt Practices Act (FCPA) and similar laws of the countries where we operate.

#### **Anti-Trust, Price-Fixing**

Antitrust and price fixing laws are designed to preserve and foster fair and honest competition among Parties within the free enterprise system. To accomplish this goal, the law is deliberately broad, prohibiting such activities as "unfair methods of competition" and agreements "in restraint of trade." The following arrangements are illegal and are strictly prohibited by Samtec: Price Fixing, Group Boycotting Tying Arrangements, restrictive agreements, product dumping, bid (RFQ) rigging, customer allocation, kickback arrangements, exclusive or reciprocal dealings, monopolization, price inducements, discriminatory allowances and misleading advertising.

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### **Privacy**

SAMTEC, Associates and Suppliers should commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including other suppliers, customers and employees. Participants are to comply with privacy and information security laws and regulatory requirements, such as the EU's GDPR, when personal information is collected, stored, processed, transmitted, and shared. For more information on Samtec Privacy processes and procedures please visit our [Privacy Notice](#)

### **Intellectual Property**

Intellectual property rights are to be respected; transfer of technology and knowhow is to be done in a manner that protects intellectual property rights; and, customer information is to be safeguarded.

### **Non-Retaliation Policy**

SAMTEC encourages Associates to report any concerns related to activity that may be illegal, unethical, or violates this Policy Manual. Such reports can be made to a manager, the General Counsel, or anonymously via e-mail to: [ethics.report@samtec.com](mailto:ethics.report@samtec.com).

SAMTEC will not permit retaliation against any person who, in good faith, reports any concerns or potential violations of applicable laws or this Policy Manual. If you believe you have experienced retaliation because you reported any concerns or participated in an investigation, you should immediately contact the Company using the methods described above

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## **4. Social Responsibility Policies**

SAMTEC defends the human rights of its Associates and seeks to reflect the ten principles of the United Nations Global Compact and Universal Declaration of Human Rights in the creation of this policy. The actions of SAMTEC and its Suppliers shall comply with the laws of the countries where we do business and protect the rights of those with which we work consistent with these policies:

### ➤ **Human Trafficking and Slavery**

SAMTEC recognizes the tragedy involved in Human Trafficking and Slavery and will not tolerate these crimes within SAMTEC or the Suppliers with which we do business. (See Samtec's Annual Statement pursuant to the UK Modern Slavery Act of 2015.

### ➤ **Harsh Treatment**

The use of harsh or inhumane treatment is not allowed within SAMTEC or by our Suppliers. The following acts/behaviors are not tolerated: coercion (mental or physical), sexual harassment, and other forms of harassment, including but not limited to verbal abuse, bullying, and threats or violence.

### ➤ **Child Labor**

Child labor is defined as work done by a person under the minimum legal working age set by the government where the work is taking place. Child labor also includes work which, because of its detrimental nature or conditions, is considered unacceptable for children below a certain age and is prohibited at any SAMTEC location or Supplier. In some cases, legitimate workplace apprenticeship programs may be utilized but only to the extent allowable under local laws and regulations and in consideration and complimentary to the apprentice's safety and educational needs.

### ➤ **Minimum Wages**

SAMTEC's and Supplier's compensation and benefits shall comply with local wage and hour laws and regulations where we do business including elements regarding minimum wages, overtime and other benefits mandated by the law of that region. Wage deductions shall comply as well.

### ➤ **Working Hours**

Working hours will be in compliance with the governing labor laws where the work is being performed. In the absence of any clearly defined law, no SAMTEC facility will exceed 80 hours overtime per month, per Associate.

### ➤ **Freedom of Association**

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SAMTEC is committed to providing a positive work environment for all Associates and to being a preferred employer. We have a long and rich history of treating our Associates with dignity and respect, providing competitive wages and benefits, having open and honest communications and providing an open door policy that ensures all Associates can raise issues without fear and retaliation. In conformance with local law, the rights of association of Associates will not be abridged.

➤ **Freely Chosen Employment**

SAMTEC does not tolerate the use of any forced, bonded or indentured labor. All Associates and employees of Suppliers should be free to leave their jobs in a voluntary manner. SAMTEC Associates and the employees of Suppliers shall not be required to hand over any government issued documents (passports, work permits or identifications) except to the limited extent needed for required verification only and to ensure compliance with local laws.

➤ **Discrimination**

Discrimination based upon race, age, gender, color, gender identity, sexual orientation, ethnicity, disability, religion, marital status, political beliefs and/or affiliations shall not be used in employment practices such as promotions, rewards, training and/or hiring.

➤ **Harassment**

SAMTEC strictly prohibits any behavior by any person (Associate, Supplier, Customer or other third party) which harasses, bullies or retaliates against an Associate or disrupts or interferes with an Associate's work performance or which creates an intimidating, offensive or hostile working environment, including but not limited to sexual harassment and conduct or language based on race, sex, ethnic background, age, religion or disability.

➤ **Health and Safety**

Samtec is committed to conducting its business and operations in a manner that will protect the safety, health and well-being of its associates, visitors, and all others that it serves. This commitment includes the following objectives:

- Comply with all legal and other requirements.
- Provide a safe work environment and safe equipment.
- Provide the necessary resources, instruction, and training to allow associates to perform duties in a responsible manner.
- Actively consult, listen and respond to associates' concerns.
- Engaging all levels of management in promoting and sustaining safety principles.

➤ **Conflict Resources**

SAMTEC recognizes the situation that is occurring in various places globally, including the Democratic Republic of Congo and does not allow the sourcing of any of the following materials that contain 3TG minerals (Tantalum (derived from Columbite-Tantalite), Tungsten (derived from Wolframite), Tin (derived

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from Cassiterite), and Gold) and/or finished materials originating, sourced, and/or smelted from the Democratic Republic of Congo or adjoining countries. Conflict Resources shall not be used within our products or supply chain.

## **5. Country Specific Policies**

### **➤ United States**

#### **Affirmative Action/Equal Employment Opportunity**

##### **Scope and Authority:**

This policy is written at the direction of the General Management Group and will apply to all Samtec business entities within the United States and Associates worldwide, to the full extent allowed by applicable local law.

##### **Description of Affirmative Action and Equal Opportunity Applicable Law:**

A set of procedures designed to eliminate unlawful discrimination between job applicants which works to remedy the results of such prior discrimination, prevent such discrimination in the future, and promotes diversity of intellects, skills and experiences to help strengthen and deepen our workforce.

##### **Business Risk Addressed:**

Beyond legal actions that can arise from discriminatory hiring practices in violation of applicable federal and state laws, as a business with government contracts and a subcontractor to customers with such contracts, violations of affirmative action and equal opportunity requirements therein can result in a breach of such contracts, loss of those opportunities and incurred damages.

##### **Affirmative Action and Equal Opportunity Policy:**

Samtec will provide equal employment opportunity in recruitment, selection, training, compensation, promotion and

assignments. These opportunities and other conditions of employment are extended to qualified applicants and Associates regardless of an individual's color, sex, age, religion, national origin, genetics, sexual orientation, gender, identity/expression, disability, veteran status and/or other protected categories under applicable laws. Samtec will make reasonable accommodations for qualified persons with disabilities.

Samtec will extend equal opportunities and take affirmative action to employ and advance in employment qualified minorities, women, disabled persons, disabled veterans, veterans of the Vietnam era, recently separated veterans, armed forces service medal veterans or other protected veterans.

To implement these policies, Samtec will maintain an Affirmative Action program by which we will work to:



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- (a) recruit, hire, train and promote qualified persons in all job titles, without regard to race, religion, color, sex, physical or mental disability, national origin, age, covered veteran's status, or any other protected group status;
- (b) base decisions on employment so as to further the principle of equal employment opportunity;
- (c) ensure that employment decisions are in accord with principles of equal employment opportunity by imposing only valid job requirements; and
- (d) ensure that all personnel actions such as compensation, benefits, transfers, promotions, layoff, return from layoff, sponsored training, education, tuition assistance, and social and recreational programs, will be administered without regard to race, religion, color, sex, disability, national origin, age, covered veteran status or any other protected group status.

**Americans with Disabilities Amendments Act:**

Samtec will comply with all applicable federal and state laws concerning the employment of persons with disabilities. Consistent with that commitment, it is our policy not to discriminate against qualified individuals with disabilities concerning application procedures, hiring, advancement, discharge, compensation, training, or other terms, conditions, and privileges of employment.

**Accommodation Policy:**

Samtec will seek to provide reasonable accommodations to qualified individuals with disabilities, unless to do so would cause undue hardship. An applicant or Associate in need of a reasonable accommodation should promptly provide written notice to HR so that the individual and Samtec can work together to determine whether an appropriate reasonable accommodation exists.