 <b>Edmund</b> optics   worldwide	DOCUMENT NUMBER:	Updated on: 02/09/2024
	<b>PM019</b>	<b>Rev C</b>


# EDMUND OPTICS

## SUPPLIER CODE OF CONDUCT

**JANUARY 1, 2017**


(INITIAL RELEASE)

Downloaded or printed copies of this document are **UNCONTROLLED!** Verify that this is the correct version before use.

	DOCUMENT NUMBER:	Initial Release Date: 01/01/2017
	<b>PM019</b>	<b>Rev C</b>
SUPPLIER CODE OF CONDUCT		Updated on: 02/09/2024

## TABLE OF CONTENTS

SUPPLIER CODE OF CONDUCT.....	3
CONFLICTS OF INTEREST .....	3
Relationships .....	3
Gifts and Gratuities.....	4
Bribes.....	4
Organizational Conflicts of Interest .....	4
ENGAGING IN FAIR, HONEST AND ACCURATE BUSINESS PRACTICES .....	5
Fair Competition.....	5
Reports, Records and Accounts .....	5
Confidential Information and Intellectual Property Rights .....	5
Confidentiality and Information Security.....	6
COMPLYING WITH LEGAL AND REGULATORY STANDARDS.....	6
Antitrust Compliance.....	6
Procurement Integrity .....	6
Prohibitions on Recruiting and Hiring Current and Former Government Employees .....	7
Anti-Kickback Act.....	7
Byrd Amendment .....	7
False Statements .....	7
False Claims .....	7
Tied Business Dealings.....	8
Anti-boycott Laws.....	8
Embargoes and Sanctions.....	8
Conflict Mineral (Dodd-Frank Wall Street Reform Act, Sec 1502).....	8
Truth in Negotiations Act (“TINA”) .....	8
HUMAN RIGHTS & LABOR PRACTICES.....	8
Human Trafficking & Labor Practices.....	9
Reducing Text Messaging While Driving .....	10
COMPLYING WITH LABOR LAWS, RULES AND REGULATIONS .....	10
HEALTH AND SAFETY.....	10
ENVIRONMENTAL COMPLIANCE .....	10
RAISING AND REPORTING CONCERNS .....	11
Toll-free Ethics Hotline Service .....	11
CONCLUSION .....	12
ANNEX A .....	13

	DOCUMENT NUMBER:	Initial Release Date: 01/01/2017
	<b>PM019</b>	Rev C
SUPPLIER CODE OF CONDUCT		Updated on: 02/09/2024

## SUPPLIER CODE OF CONDUCT

Edmund Optics, Inc. and subsidiaries (“Edmund” or the “Company”) conducts its business affairs with uncompromising integrity and it expects all suppliers, agents, contractors, and consultants (“Partners”) to conduct business in the same manner. Conducting our business with uncompromising integrity means acting ethically and complying with applicable laws and regulations. In an effort to ensure integrity in its business operations, Edmund complies with the requirements contained in this Code of Conduct (“Code”) and requires its Partners to conduct business in a manner that complies both with the letter and spirit of this Code. This Code is not intended to provide a list of every ethical and legal responsibility. Rather, this Code is intended to address those ethical and legal issues that may arise more commonly within the lines of business currently conducted by Edmund.

In addition to laws and regulations governing commercial transactions, as a contractor that provides services and supplies to various U.S. government entities, Edmund and its suppliers are also required to comply with certain unique laws, rules, and regulations that are addressed in this Code. With respect to laws and regulations applicable to the pursuit and performance of the aforementioned contracts, this Code addresses some of the basic principles that guide Edmund and each of Edmund’s Suppliers.


## CONFLICTS OF INTEREST

A conflict of interest can arise any time a financial or other commercial or personal relationship may influence Edmund’s, or its Partner’s ability to fairly, accurately, and ethically perform contractual requirements. The following examples serve as an overview of several common conflicts of interest encountered and are intended to serve as illustrative guidelines that Edmund and its Partners are required to follow.

A conflict of interest exists when a person’s private interest interferes, or appears to interfere, in any way with Edmund’s, or its Partner’s, ability to perform contractual requirements. A conflict can arise when an employee, officer, or director takes actions or has interests that may make it difficult to perform their work objectively and effectively. Conflicts of interest may also arise when an Edmund or Partner employee, officer, or director, or members of his or her family, receives improper personal benefits as a result of his or her employment position.

### Relationships

If a Partner, or someone with whom the Partner has a financial, employment, or other relationship with Edmund or an existing or potential Edmund competitor, customer, supplier, service provider or other business partner of Edmund, that relationship may create a conflict of interest. Edmund will notify its customers and requires its Partners to disclose all such relationships to Edmund so that Edmund may ensure actual conflicts of interest are avoided.

	DOCUMENT NUMBER:	Initial Release Date: 01/01/2017
	<b>PM019</b>	Rev C
SUPPLIER CODE OF CONDUCT		Updated on: 02/09/2024

It is almost always a conflict of interest for an Edmund employee, or an employee of Edmund’s Partner, to work simultaneously for a competitor, customer, or supplier.

**Gifts and Gratuities**

Providing gifts, both tangible and in the form of entertainment and meals, can create conflicts of interest and may be prohibited by applicable law. All gifts and entertainment to or from government personnel (federal, state and local), including persons that may be acting for or on behalf of the government, are expressly prohibited. A “gift” includes any gratuity, favor, discount, entertainment, hospitality, loan forbearance, or other item having monetary value, as well as services such as training, transportation, lodging and meals, whether provided in-kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.

Additionally, most countries have laws and regulations restricting gifts that may be given to government employees, including employees of government-owned or partially-owned entities. For example, the United States Foreign Corrupt Practices Act (“FCPA”) provides for severe penalties for companies and individuals who engage in direct or indirect bribery of government officials. Many countries have similar laws and extend anti-bribery restrictions to the private sector. Edmund expects all Partners to strictly abide by all such laws and regulations, including the FCPA.

**Bribes**


Bribes or other means of obtaining undue or improper advantage are prohibited. A bribe is anything of value given to a public official or employee, directly or indirectly, with the intent to influence or reward an official act or failure to act. Because the determination of whether or not a gift, or other thing of value, is a bribe or illegal gratuity depends on the mental state of the giver and the recipient, Edmund and its Partners must avoid even the appearance of impropriety. Any Edmund or Partner employee who has knowledge of such activity must report it in accordance with the reporting procedures set forth in this Code.

**Organizational Conflicts of Interest**

In addition to the conflicts of interests addressed above, the contracts and subcontracts for services or supplies provided to U.S. government entities may require that Edmund and its Partners comply with rules and regulations governing organizational conflicts of interest (“OCI”). As a general matter, an OCI can arise when a contractor has past, present, or currently planned interests that: (a) either directly or indirectly relate to work to be performed under a U.S. Government contract; and (b) may diminish the contractor’s capacity to give impartial, technically sound assistance and advice or give the contractor an unfair competitive advantage.

Edmund and its Partners will review all U.S. Government-related contracts and subcontracts to identify improper OCIs. Such potential OCIs may need to be mitigated with an appropriate mitigation plan.

Downloaded or printed copies of this document are UNCONTROLLED! Verify that this is the correct version before use.

	DOCUMENT NUMBER:	Initial Release Date: 01/01/2017
	<b>PM019</b>	Rev C
SUPPLIER CODE OF CONDUCT		Updated on: 02/09/2024

## ENGAGING IN FAIR, HONEST AND ACCURATE BUSINESS PRACTICES

### Fair Competition

Edmund and its Partners outperform competition fairly and honestly. Competitive advantages are created with superior performance and services, not unethical or illegal business practices. Stealing proprietary information, obtaining or possessing trade secret information that was attained without the owner’s consent, or inducing such disclosures from other companies is prohibited. Each employee, officer and director of Edmund and its Partners should endeavor to respect the rights of, and deal fairly with, customers, suppliers, and competitors. Employees of Edmund and its Partners shall not use manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.

Partners shall not enter into any agreement, understanding or plan (written or oral) with any competitors with regard to price, terms or conditions of sale, production, distribution, territories or customers, or exchange or discuss with any of its competitors pricing, marketing plans, manufacturing costs or other competitive information. Partners shall also comply with all antitrust laws applicable to their business activities.

### Reports, Records and Accounts

Edmund and its Partners shall maintain records and books of account that satisfy the highest standards and accurately reflect the true nature of the transactions they record.


Financial, accounting and other reports and records must accurately and fairly reflect the transactions and financial conditions of the company in reasonable detail, and in accordance with generally accepted and approved accounting principles, practices and procedures and applicable government regulations.

For records related to the performance of a U.S. government contract, Edmund and its Partners shall retain records for three years after final payment, unless a longer period of retention is required by government regulations.

### Confidential Information and Intellectual Property Rights

Edmund and its Partners seek to maintain the confidentiality of information entrusted to them by customers and suppliers, except when disclosure is authorized or legally mandated. Partners must not disclose proprietary or confidential information about Edmund or its employees or customers, or confidential information about an end customer, supplier or distributor, to anyone who is not authorized to receive it, or has no need to know the information. The only exceptions to this standard are when disclosure is authorized by Edmund and its customers, suppliers or distributors, or by applicable law, or appropriate legal process (i.e. subpoena). If a Partner must disclose confidential information to a third party, they should ensure that appropriate protections, such as a non-disclosure agreement, have been put in place prior to the disclosure. Partners are to respect Edmund and other

Downloaded or printed copies of this document are UNCONTROLLED! Verify that this is the correct version before use.

	DOCUMENT NUMBER:	Initial Release Date: 01/01/2017
	<b>PM019</b>	Rev C
SUPPLIER CODE OF CONDUCT		Updated on: 02/09/2024

third-party intellectual property rights at all times. Partners also are expected to comply with all pertinent data privacy laws and regulations, for example GDPR, as well as Edmund’s privacy practices.

**Confidentiality and Information Security**

Employees, officers and directors of Edmund and its Partners must maintain the confidentiality of proprietary and confidential information entrusted to them by Edmund and its customers, except when disclosure is authorized and permissible. The obligation to preserve confidential information and to abide by information security requirements can continue even after employment ends.

The contracts and subcontracts for services or supplies to government entities may also require that Edmund and its Partners comply with additional confidentiality and information security requirements. To the extent applicable, Edmund and its Partners must comply with all requirements for the handling of government confidential and sensitive information. All such information and other items must be handled and safeguarded in strict compliance with the laws and regulations governing the receipt and handling of such information. Nothing contained herein shall be interpreted to prohibit or otherwise restrict employees or subcontractors from lawfully reporting government waste, fraud, or abuse related to the performance of a government contract to a designated investigative or law enforcement representative of a Federal department or agency authorized to receive such information (e.g., agency Office of the Inspector General).

**COMPLYING WITH LEGAL AND REGULATORY STANDARDS**

Edmund employees, along with Edmund’s Partners and their respective employees, are required to strictly observe all applicable laws and regulations. Violations of law by a Partner can harm Edmund’s and its customers’ reputation. Partners should require that their employees are familiar with the basic legal requirements that pertain to their duties and responsibilities.

The following are summaries of some of the applicable laws. The summaries are not intended to be comprehensive in nature; rather, they identify some of the more prominent issues governing the pursuit, receipt, and performance of government contracts.


**Antitrust Compliance**

Companies are subject to complex laws and regulations designed to preserve competition among enterprises and to protect consumers from unfair business arrangements and practices (known in some countries as “antitrust” laws). Edmund and its Partners are expected to comply with these laws at all times.

**Procurement Integrity**

During the pendency of a government procurement, Edmund and its Partners will refrain from soliciting, obtaining or disclosing contractor bid or proposal information or proprietary or source selection information. The Procurement Integrity Act also places restrictions on employment

Downloaded or printed copies of this document are UNCONTROLLED! Verify that this is the correct version before use.

	DOCUMENT NUMBER:	Initial Release Date: 01/01/2017
	<b>PM019</b>	Rev C
SUPPLIER CODE OF CONDUCT		Updated on: 02/09/2024

discussions with current and former federal officials with regard to future non-government employment. Employees of Edmund and its Partners should avoid such discussions.

**Prohibitions on Recruiting and Hiring Current and Former Government Employees**

Certain laws and regulations prohibit government employees from accepting employment with designated types of entities, including entities that transact business with the U.S. government. The requirements, obligations, and prohibitions relating to hiring current and former government employees are complex. Neither Edmund, nor its Partners, should have employment discussions with current or former employees of a government entity until the necessary legal counsel has provided written authority for such discussions.

**Anti-Kickback Act**

Directly or indirectly offering, providing, soliciting or accepting anything of value in return for favorable treatment in connection with a government contract or subcontract is a violation of Company policy and federal law that may result in company discipline as well as severe civil and criminal penalties.

**Byrd Amendment**

The Byrd Amendment prohibits the use of appropriated funds to pay any person for influencing or attempting to influence officials of the Executive or Legislative branches, including members of Congress and their staffs, in connection with the award of modification of government contracts. Edmund and its Partners shall refrain from using appropriated funds to attempt to influence government officials and shall establish and maintain accounting systems that adequately segregates non-appropriated funds for the purposes of any lobbying activity.


**False Statements**

It is a crime to knowingly and willfully make false, fictitious, or fraudulent statements or to falsify, conceal, or cover up a material fact to an employee of a federal government agency. This statute is frequently used to prosecute companies and individuals for false statements that are made by employees to agencies in the course of the competition for or performance of a government contract. In this regard, a knowing false representation with respect to a company’s ability or agreement to comply with virtually any of the federal government contract requirements could subject a company and individuals to criminal liability. Employees of Edmund and its Partners are required to record information accurately and truthfully, and to avoid misrepresentations.

**False Claims**

Civil liability for false claims arises from knowingly making or causing to be made a false or fraudulent claim for payment or approval to an officer or employee of the United States or any other country. Criminal liability for false claims arises for making or presenting to any federal, or similar, agency a claim that is known to be false, fictitious or fraudulent. The US civil and criminal False Claims Acts are frequently used to prosecute companies and individuals for submission of false or fraudulent claims for payment under a federal government contract, with other countries employing similar acts and

Downloaded or printed copies of this document are UNCONTROLLED! Verify that this is the correct version before use.

	DOCUMENT NUMBER:	Initial Release Date: 01/01/2017
	<b>PM019</b>	Rev C
SUPPLIER CODE OF CONDUCT		Updated on: 02/09/2024

penalties. Employees of Edmund and its Partners are required to record billing and related information accurately and truthfully and to avoid misrepresentations.

**Tied Business Dealings**

“Tying” arrangements, whereby customers are required to purchase or provide one product or service as a condition for another being made available, are unlawful in certain instances. Edmund and its Partners will take the necessary steps to comply with the applicable “tying” laws and regulations.

**Anti-boycott Laws**

United States laws, and the laws of many other countries, prohibit persons from taking actions or entering into agreements that have the effect of furthering any unsanctioned boycott of a country. Edmund and its Partners are required to comply with all anti-boycott laws applicable in their jurisdiction.

**Embargoes and Sanctions**

Edmund and its Partners are required to comply with all applicable international economic sanctions and embargoes restricting persons, corporations and foreign subsidiaries from doing business with certain countries, groups and individuals. Economic sanctions prohibit and restrict business with targeted governments and organizations, as well as individuals and entities that act on their behalf. Sanction prohibitions also may restrict investment in a targeted country, as well as trading in certain goods, technology and services with a targeted country. Edmund screens all suppliers, contractors, customers and agents against all applicable denied party lists in use in the US, UK, EU, Singapore and Japan and will act accordingly on any information obtained.

**Conflict Mineral (Dodd-Frank Wall Street Reform Act, Sec 1502)**

Edmund and its Partners must ensure that all products within the Supply Chain comply with the regulations for “Conflict Minerals” and do not contain; Gold, Tin, Tantalum or Tungsten originating from the Democratic Republic of the Congo, Central African Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda, Uganda or any other adjoining countries or countries currently subject to sanctions by the US, European Union or any other applicable national or international authority.


**Truth in Negotiations Act (“TINA”)**

Edmund and its Partners recognize the accurate cost and pricing disclosures, communications and representations of fact to customer representatives. Edmund and its Partners must ensure that any such disclosures and communications are complete, current, accurate, and truthful.

**HUMAN RIGHTS & LABOR PRACTICES**

EO, and any supplier or other third party working with EO, must comply with all labor and employment laws in the jurisdictions where it operates. We are guided by principles and standards such as those in the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and

Downloaded or printed copies of this document are UNCONTROLLED! Verify that this is the correct version before use.

	DOCUMENT NUMBER:	Initial Release Date: 01/01/2017
	<b>PM019</b>	Rev C
SUPPLIER CODE OF CONDUCT		Updated on: 02/09/2024

Human Rights, and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. EO expressly prohibits and will not tolerate the use of forced or bonded (including labor demanded of employees because of their debt) labor, prison labor, slavery, trafficking in persons, and child labor. EO fundamentally opposes these practices in its supply chain.

EO prohibits the use of child labor. Our hiring practices conform to the ILO Minimum Age and Child Labor Standards. EO respects all local laws regarding compulsory school attendance and does not hire children under the legal age for employment in any location. EO employees under the age of 18 are prohibited from performing hazardous work. EO employees under the age of 18 should be restricted from work if it interferes with educational needs. The use of legitimate workplace interns and apprentices which comply with all laws and regulations are supported as they have a positive impact on the employee and community.

The U.S. Government and by extension, EO, has a zero-tolerance policy regarding trafficking in persons, procurement of commercial sex acts, and use of forced labor. All EO employees, contractors, consultants and other agents and representatives that are working directly or indirectly on any U.S. Government contract are prohibited from engaging in or supporting any trafficking in persons, use or procurement of commercial sex acts, or use of forced labor.

**Human Trafficking & Labor Practices**

Edmund and its Partners have a zero-tolerance policy regarding forced or bonded (including labor demanded of employees because of their debt) labor, prison labor, slavery, trafficking in persons, and child labor. All employees, contractors, consultants, suppliers and other agents working directly or indirectly with Edmund are prohibited from engaging in or supporting any of these practices.


The U.S. Government and by extension, EO, has a zero-tolerance policy regarding trafficking in persons, procurement of commercial sex acts, and use of forced labor. All EO employees, contractors, consultants and other agents and representatives that are working directly or indirectly on any U.S. Government contract are prohibited from engaging in or supporting any trafficking in persons, use or procurement of commercial sex acts, or use of forced labor.

All Partners shall ensure that all work is voluntary, and shall not traffic persons or use child, forced, or involuntary labor of any kind (including forced, bonded, indentured, or involuntary prison labor). Employment must be voluntary.

Partners shall take steps to ensure that the products and materials they sell to Edmund are not created with child labor, forced labor, or through victims of human trafficking and shall take appropriate steps to eliminate such practices in their supply chains.

Partners shall not withhold workers’ original government-issued identification and travel documents and shall not impose unreasonable restrictions on movement within the workplace. The term “child”

Downloaded or printed copies of this document are UNCONTROLLED! Verify that this is the correct version before use.

	DOCUMENT NUMBER:	Initial Release Date: 01/01/2017
	<b>PM019</b>	Rev C
SUPPLIER CODE OF CONDUCT		Updated on: 02/09/2024

refers to any person under the age for completing compulsory education or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported.

This policy aligns with human trafficking laws in force in the United States, the principles laid out in the UK Modern Slavery Act 2015, as well as other similar acts in force globally.

### Reducing Text Messaging While Driving

Text messaging whilst driving is illegal in many U.S. states as well as in many countries globally, by extension, Edmund and its Partners, encourage all employees to follow safe driving practices and ensure compliance with the local laws regarding cellphone use/text messaging whilst driving. As such, the sending or receiving of text messages by employees while driving is strictly prohibited: (i) at all times in a company-provided vehicle or rented vehicle paid for with company funds, or (ii) in a private vehicle, while performing work on behalf of Edmund or its customers.

## COMPLYING WITH LABOR LAWS, RULES AND REGULATIONS

Edmund and its Partners are expected to comply with all applicable labor laws, rules and regulations. Edmund’s commitment to integrity is supported by diverse, productive work environments that are free from unlawful discrimination or harassment. Edmund and its Partners are committed to a workplace free of harassment and unlawful discrimination. Edmund does not, and Partners shall not, engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership, or marital status in hiring or other employment practices such as promotions, rewards, and access to training or other growth opportunities.

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace issues. Partners should respect the rights of workers to associate freely. Partner’s employees shall be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment.


## HEALTH AND SAFETY

Edmund and its Partners will provide their employees with safe workplaces that meet, at a minimum, applicable country/regional laws and regulations and protect employees’ health and well-being. All new employees will be briefed on the health and safety policy in force at their local office, as well as training on local fire evacuation procedures and any training specific to their role.

## ENVIRONMENTAL COMPLIANCE

Suppliers are expected to comply with all applicable environmental laws and regulations, including but not limited to: New Development Concept from China, WEEE (Waste from Electrical and Electronic Equipment), EU Green Deal, CE (Conformité Européenne) marking, REACH (registration, evaluation,

Downloaded or printed copies of this document are UNCONTROLLED! Verify that this is the correct version before use.

	DOCUMENT NUMBER:	Initial Release Date: 01/01/2017
	<b>PM019</b>	Rev C
SUPPLIER CODE OF CONDUCT		Updated on: 02/09/2024

authorization and restriction of chemicals), ROHS (Directive Restriction of Hazardous Substances), TSCA (Toxic Substances Control Act), California proposition 65, UKCA (UK Conformity Assessed), Korean Electrical certification, Japanese PSE certification and documentation related to local embargos on specific products for specific countries.

Suppliers are expected to implement measures to minimize energy consumption, reduce waste, and promote efficiency within their operations. Suppliers are expected to adopt eco-friendly packaging and shipping practices when possible. Suppliers shall ensure transparency within their supply chain, including the origins of raw materials used in the production of optics and photonics products. Suppliers are encouraged to disclose their own sustainability practices and efforts. Suppliers should demonstrate a commitment to continuous improvement in their sustainability practices. Edmund Optics encourages collaboration with our suppliers on innovative solutions to reduce the environmental impact of products.

## RAISING AND REPORTING CONCERNS


In order to ensure that Edmund is able to conduct its business in a manner consistent with the policies, laws, and regulations established and referred to in this Code, it has established a hotline that can be used by Edmund, its Partners, and respective employees thereof. A Partner or its employees that suspects or has a concern regarding a possible violation of this Code by any person or party should raise the concerns by reporting to the hotline.

### Toll-free Ethics Hotline Service

Concerns may be reported to the Edmund toll-free ethics hotline which is managed by a third-party provider, Lighthouse. More information about EO's report hotline is available at [www.lighthouse-services.com/edmundoptics](http://www.lighthouse-services.com/edmundoptics). Toll free numbers are listed in Annex A. This service is available 24 hours a day, 7 days a week. Specially trained interviewers will document concerns and provide a report to the appropriate contacts at Edmund. Callers do not have to provide their identity. Interview specialists that speak multiple languages are always available.

In addition, interview specialists have translators available to enable reports to be provided in more than 150 additional languages. Information provided to the hotline by callers located outside of the United States will be transmitted to the United States in a manner consistent with applicable data privacy regulations, for example GDPR.


Edmund will not retaliate or threaten to retaliate against any Partner who in good faith reports concerns or a possible violation of this Code or who participates in or cooperates with any investigation, whether or not it is determined that an actual violation has occurred. Reports will be kept as confidential as possible under the circumstances presented and the Company's obligations under applicable law.

	DOCUMENT NUMBER:	Initial Release Date: 01/01/2017
	<b>PM019</b>	Rev C
SUPPLIER CODE OF CONDUCT		Updated on: 02/09/2024

## CONCLUSION

It is and always will be Edmund’s intent to operate within the highest standards of ethics and integrity. This Code was developed to reinforce these values and to ensure that they are clear to all of Edmund’s customers and Partners. The Company appreciates each Partner’s commitment to apply these ethical standards and behaviors in all its dealings with and on behalf of Edmund and trusts that all Partners will consistently reinforce the Company’s reputation for uncompromising integrity.

Downloaded or printed copies of this document are **UNCONTROLLED!** Verify that this is the correct version before use.


	DOCUMENT NUMBER:	Initial Release Date: 01/01/2017
	<b>PM019</b>	Rev C
SUPPLIER CODE OF CONDUCT		Updated on: 02/09/2024

## ANNEX A

### Ethics Hotline Numbers

Location	Toll-free Number
USA	+1-855-700-0099
UK	0-800-89-0011
Japan	00-539-111
Singapore	800-011-1111
Malaysia	1-800-80-0011
China	108-10
Germany	0-800-225-5288
Korea	00-729-11
India	000-117
France	0-800-99-0011

Downloaded or printed copies of this document are **UNCONTROLLED!** Verify that this is the correct version before use.

	DOCUMENT NUMBER:	Initial Release Date: 01/01/2017
	<b>PM019</b>	<b>Rev C</b>
<b>SUPPLIER CODE OF CONDUCT</b>		Updated on: <b>02/09/2024</b>

Reference Documents	

**Affected Plants** *indicates what areas are impacted and/or should be trained when changes occur*

Akita       Florida       Korea       Taiwan       United Kingdom  
 Barrington       ITOS       Malaysia       Tucson       **Global**  
 China       Germany       Singapore       Tokyo

**Affected Departments** *indicates what areas are impacted and/or should be trained when changes occur*

Accounting/Finance       Executive       Manufacturing       Research & Development  
 Assembly       Fabrication Cell       Marketing       Sales: Call Center  
 Coatings       Human Resources       Product Line Management       Sales: Custom/Defense  
 Compliance       IS/IT       Project Management Team       Sales: HVC/OEM  
 Design Services       Machine Shop       Product Support Engineers       Sales: Product Support  
 Distribution/Shipping       Maintenance       Quality Assurance       Supply Chain  
 **All Departments**

**Category** *choose one that best describes the documents ISO category*

Accounting       Handling, Storage & Preservation       Production, Manufacturing & Assembly  
 Compliance       Human Resources       Quality Assurance & Control  
 Continuous Improvement       IS & IT       Safety & Security  
 Design Control       Inspection, Measuring & Testing       Sales & Servicing  
 Document Control       Non-Conformity, Corrective Action       Supply Chain  
 Engineering & Development       Packaging & Delivery       Top Management  
 Environmental       Product Identification & Traceability

Revision History			
Rev.	Date	Description	Updated by
--	01/01/2017	Initial Release	M. Williams
A	10/05/2018	Updates and Revisions	O. Simmons
B	04/02/2020	Updates and Revisions	J. Misner
C	02/09/2024	Update template; Environmental Compliance per J. Harvey	J. Misner

**Approvers**

<p><b>Jennifer Misner</b></p> <p><small>Digitally signed by: Jennifer Misner DN: CN = Jennifer Misner email = jmisner@edmundoptics.com C = US O = Edmund Optics, Inc. OU = Compliance Department Date: 2024.02.29 13:52:52 -0500</small></p> <hr/> <p>Jennifer Misner, Compliance Manager</p>	<p><b>Jody MacIntosh</b></p> <p><small>Digitally signed by: Jody MacIntosh DN: CN = Jody MacIntosh email = jmacintosh@edmundoptics.com C = AD O = Edmund Optics, Inc. OU = Quality Assurance Manager Date: 2024.02.29 13:53:02 -0500</small></p> <hr/> <p>Jody MacIntosh, Management Representative</p>
---	---

**Effective Date:**  
**02/09/2024**

**Responsible Party:** Jay Budd

Downloaded or printed copies of this document are UNCONTROLLED! Verify that this is the correct version before use.