

Supplier Code of Conduct

This document summarizes our key expectations of all suppliers of goods and/or services to Phoenix Electronic Enterprises, Inc.

Phoenix Electronics has adopted the principles of sustainable development and corporate social responsibility outlined here and requires all our suppliers, subcontractors and service providers to review their own operations to ensure harmonization with these goals and commitments.

Governance of Phoenix Electronics is guided by the principles set forth in the ISO 26000 international standard and we require our suppliers to support and adopt these same practices.

Environmental Management

Phoenix Electronics recognizes and accepts its responsibility to protect and preserve the environment and to help achieve a state of sustainable development. In support of these responsibilities, we have established the following commitments:

- Compliance with all relevant federal, state and local legal requirements relating to environmental management.
- Conservation of natural resources, including energy, through source reduction, waste management, reuse and recycling, reduction of scope 1 and 2 greenhouse gas (GHG) emissions and pollution control.
- Continual environmental performance improvement through the involvement of all employees and stakeholders and partnership with the local community.
- Responsible material procurement including restriction of harmful substances and avoidance of raw materials sourced from global conflict zones.
- Alignment of our environmental management system with the principles and practices set forth in the ISO 14001 international standard.

Decent Work and Human Rights

Phoenix Electronics is committed to upholding the human rights of workers and to ensuring all workers are treated with dignity and respect.

Through our Decent Work Policy, we establish minimum standards of performance and engagement with our workforce that includes:

- The prohibition of child labor, forced labor, modern slavery and human trafficking.
- Free choice of employment, basic liberty and dignity of our workers and freedom to leave employment without penalty or obstruction.
- Regulation of working hours and provision of living wages.
- Freedom of association, the right to form and join trade unions, to bargain collectively and engage in peaceful assembly, and respect for the right of all workers to refrain from such activities.

- A workplace free of discrimination on the basis of race, color, creed, national origin, gender, age, sexual orientation, religion, political affiliation, union membership and/or marital status.

For more information, refer to our Decent Work Policy.

Occupational Health and Safety

All Phoenix Electronics suppliers shall provide and maintain a safe work environment that complies, at a minimum, with the requirements of the U.S. Occupational Health and Safety Administration (OSHA), ensuring:

- Workers have knowledge of the inherent risks involved in their work and have access to appropriate protection and the right to refuse unsafe work and report unsafe conditions.
- Workers are provided with appropriate personal protective equipment (PPE) and where machinery is present or used all physical guards, interlocks and/or barriers are implemented and hazards mitigated.
- Physically demanding work is identified, evaluated and controlled and ready access to potable water, sanitary food preparation and clean toilets are available.
- When provided, housing facilities and food are maintained according to local laws and regulations.

Fair Business Practices

Phoenix Electronics requires all suppliers to adhere to the highest standards of fair and ethical business practices through:

- Ethical conduct of business. Suppliers shall not engage in bribery, corruption, extortion and/or embezzlement.
- Transparency. Information regarding supplier's labor, health and safety, environmental practices, business activities and performance is to be disclosed pursuant to applicable regulations and prevailing industry norms.
- Respect for intellectual property. That intellectual property rights, transfer of technology and/or know-how is protected and customer information is safe from disclosure. Suppliers shall proactively identify counterfeit products or sub-components and eliminate them from the supply chain.
- Partnering. Suppliers are encouraged to approach with mutually beneficial solutions and recommendations.

Protection of Employee Identity and Non-Retaliation

Suppliers should implement a process that allows employees to raise concerns without fear of retaliation. The process should ensure the confidentiality, anonymity and privacy of employees/whistleblowers is maintained.

Quality Management

We value our suppliers and the important part they play in the quality of our products and our success as a customer-oriented company.

Our employees and suppliers become engaged and aligned with our quality practices through a common understanding of our quality policy and our desired results.

Quality Policy

- To consistently and sustainably provide defect-free products on-time, every time that meet and/or exceed customer specifications for quality, delivery and workmanship.
- To comply with all mechanical, electrical, legal, social, environmental and other regulatory requirements applicable to our products.
- To establish, implement, maintain and continually improve our quality management system.

As a supplier to Phoenix Electronics, you are expected to recognize and understand our quality policy and support our commitment to customer satisfaction.

Our quality management system is aligned with the principles and practices set forth in the ISO 9001 international standard.

EICC Code of Conduct and United Nations Global Compact

Phoenix Electronics supports and strongly encourages our supplier's adherence to the EICC (Electronic Industry Citizen's Coalition) Code of Conduct which may be found at:

<http://www.responsiblebusiness.org/standards/code-of-conduct>

Phoenix Electronics is a member of the United Nations Global Compact and we support and strongly encourage our suppliers to adhere to the rules and principles set forth by this organization which may be found at:

<https://www.unglobalcompact.org>

Cascading of Requirements

We encourage all Phoenix Electronics suppliers to communicate our key expectations to their own suppliers and monitor their compliance.