



**SUPPLIER**  
CODE OF CONDUCT



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**Globe Tech's goal is to build trust-based relationships with ethical Suppliers that meet the following requirements:**

## **1. Obey the Law**

As a responsible company, we expect our Suppliers to share our commitment to following the law. Know and follow the regional, jurisdictional, and country laws that apply to your business. Treat legal requirements as a minimum standard.

## **2. Conduct Business with Honesty and Integrity**

Globe Tech seeks business relationships based on trust, transparency, and mutual accountability. Set up and continuously improve appropriate management processes to prevent, identify, mitigate and if necessary, remediate, negative social, environmental, health and safety related impacts on workers and the community. Uphold standards of fair competition, ethical business practices, and honest advertising.

## **3. Supplier's Supply Chain**

Use reasonable efforts to address legal, social, and environmental risks in your own supply chain and make reasonable efforts to ensure sub-suppliers adhere to comparable requirements.

## **4. Dignity and Mutual Respect**

Foster an inclusive work environment that supportive energy and encourages individual growth and strong teams. Prohibit unwelcome conduct that creates an intimidating, offensive or hostile work environment. Instead, encourage and expect mutual respect among working colleagues (to respect the personal dignity, privacy, and rights of each individual), and between our companies. Treat all individuals with respect. Foster an inclusive work environment that is free of harassment. "Harassment" means any conduct or comments that create, encourage, or permit an offensive or intimidating work environment, including verbal or physical harassment, intimidation, mental cruelty, bullying, sexual harassment, power harassment, racism, or other actions that are objectively offensive or inappropriate. Whether it is targeted at you or someone else, object to such conduct. Prohibit all behavior, including gestures, language and physical contact, that is sexual, coercive, threatening, abusive, or exploitative.

## **5. Non-Discrimination**

Supplier should value a diverse workforce and expect their hiring managers to observe applicable laws against discrimination. Employment decisions like hiring, pay, title, promotion, discipline, termination, or working conditions should be solely based on a person's performance and ability. Do not discriminate based on personal factors such as: gender, gender identity, or expression, family status, age, nationality, race, ethnicity, skin color, or cultural background, religion or beliefs, disability, genetics or health information, including pregnancy, sexual orientation, union affiliation, and military or veterans' status. Any position requirements and employment related decisions must be based on a legitimate business reason, and candidates must be evaluated based solely on talent, skill, and experience. Speak up if you observe discrimination or believe someone has been unfairly discriminated against.



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## 6. Practicing Diversity and Inclusion

Suppliers should encourage diversity and inclusion, which will: (a) build trust by rewarding people based on their contribution and reinforcing an atmosphere of respect; (b) strengthen the working environment by helping to bring out the best in people; and (c) drive performance, by ensuring attracting and hiring the best, most qualified candidates.

## 7. Safe and Healthy Workplace

Globe Tech has a Safety-First Pledge that Supplier must follow: "Nothing is more important than our associates' safety." Maintain clean, healthy, and safe working environment for all associates while on the job, enforce established safety and health rules, and comply with or exceed applicable safety and health laws and codes as established, to reduce the chances of accidents, incidents, injuries, near misses, work-related illnesses, and unsafe conditions. Our Suppliers must take responsibility for safety – providing safe and healthy working conditions at all of their operations. Know and follow all safety requirements, including the use of personal protective equipment. Never take shortcuts or ignore required safety practices. Control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases. Ensure that employees are properly trained and equipped for their jobs. Finally, to create a safe working environment, Supplier's should ensure employees do not use, or possess, illegal drugs while at work and should not work while under the influence of drugs or alcohol.

## 8. Fair Working Hours and Compensation

Globe Tech observes all applicable rules regarding working hours and provides fair competitive wages to its employees. All employees may openly communicate with senior management without having to fear any reprisals. Suppliers must comply with applicable law regarding the maximum number of working hours. Except in emergency or unusual situations, work week should not exceed 60 hours, including overtime. All overtime worked must be paid according to applicable wage laws. Provide fair remuneration and pay at least the applicable national statutory minimum wage. Recognize, as far as legally possible, the right of free association and collective bargaining of employees and neither favor nor discriminate against members of employee organizations or trade unions.

## 9. Modern Slavery and Child Labor

Do not tolerate any forms of modern slavery, including forced, bonded or compulsory labor, or human trafficking, including by your suppliers or other business partners. Respect children's right to personal development and education, and do not use child labor. Observe the minimum employment age in your country. Never hire children, even if permitted by local law. "Human trafficking" means recruiting, harboring, or transporting people into a situation of exploitation through the use of violence, deception or coercion and forcing them to work against their will. "Forced labor" means any work or service that people are forced to do against their will, under threat of punishment and for which the person did not volunteer.



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## 10. Anti-Corruption, Bribery and Money Laundering

Bribery and corruption distort the market, interfere with free competition, and violate laws that carry significant penalties for the companies and individuals involved. Money laundering allows criminals and others to disguise the source of funds obtained illegally. These funds may come from or support activities like human trafficking, drug trafficking, terrorism, blackmail, or fraud. Do not participate in, endorse, or tolerate any bribery, corrupt practices, or money laundering, including offering or accepting kickbacks, bribes, excessive gifts or hospitality, or facilitation payments – directly or indirectly through employees, third parties or agents, including any payment or other form of benefit conferred for the purpose of influencing decision making in violation of law.

## 11. Conflict of Interest

A conflict of interest occurs when individuals place their personal interests (i.e., family, friend, co-worker, or personal finance) above the interest of the company, thereby, compromising their judgment, decisions, or actions in the workplace. Globe Tech recommends that our Suppliers educate their employees concerning conflicts of interest. Suppliers should instruct their employees to engage in conduct that always protects and promotes the company's, and their customer's, best interests. Suppliers should promote awareness, to avoid any activities that can harm the company financially, but even more significantly, can damage the company's and its customer's reputation. Situations that constitute a conflict or give the appearance of a potential conflict should be disclosed immediately.

## 12. Trade Compliance (Exports and Imports)

Comply with international trade rules, by which countries regulate the movement of products, technology, software, and technical information across national borders. Violations can lead to criminal prosecution for the companies and individuals responsible, along with bad publicity, delayed shipments, or even the loss of import/export privileges. Investigate export license requirements before exporting a product or sharing technical information or software across national borders. Screen certain business partners, including distributors, importers, dealers, and customers, ensuring they are not prohibited parties to the agreement, subject to sanctions, or debarred from government contracts. Know and follow the trade restrictions that apply where you do business. These can be complex, as rules vary by location and may change in response to world events. Observe all customs and export control requirements, including documentation related to classification, valuation, and country of origin. Globe Tech is DFAR compliant, and ITAR registered.

## 13. Confidential Information and Intellectual Property

Protect the confidential information of Globe Tech and its customers, which includes any non-public information about processes, products, innovation, and financial or strategic plans or position. Suppliers must sign a Mutual Non-Disclosure Agreement when such information is applicable. Protect Globe Tech's reputation and any information and property we entrust to you. Mark and handle information as confidential, and store in a manner to restrict access. Intellectual property of Globe Tech and its customers – such as technical inventions, patents, copyrights, know-how, trade secrets, inventions, designs, and trademarks and related licenses – are highly valuable assets, and must be carefully protected, defended, and never disclosed to third parties unless specifically authorized in writing to do so. Handle confidential information or intellectual property properly, safeguard it from inappropriate disclosure, and use it only in ways that are permitted. Report any suspected or alleged unpermitted use of intellectual property to Globe Tech.





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## 14. Customer Owned Property

Safeguard any property belonging to Globe Tech, or its customers, under your control.

## 15. Accurate and Honest Records

Conducting business honestly and transparently with honest communications, mutual respect, deliver on commitments, and manage unanticipated events in a proactive, timely, and open manner. Records (accounting and quality related) must be accurate, honest, and retained for the agreed-upon period per Globe Tech's Terms and Conditions.

## 16. Whistle Blowing and Non-Retaliation

Establish an effective grievance procedure (whistle-blowing system) to ensure that any worker, acting individually or with other workers, can submit a grievance without suffering a prejudice or retaliation of any kind.

## 17. Environmental Compliance

To the best of your ability, Suppliers should ensure that products and services purchased or contracted conform to the goals of Globe Tech's environmental policy. Strive, where feasible, to purchase environmentally preferable products and services to meet the company's office and operational needs, to improve environmental performance, to provide environmentally preferable products, and document the supply-chain impacts of efforts.

### **Globe Tech's Purchasing decisions will positively favor products and services that:**

- a. Reduce greenhouse gas emissions;
- b. Are made with renewable energy;
- c. Reduce pollution from all discharges (releases to air, water, and land);
- d. Reduce the use of toxic materials hazardous to the environment, employees, and public health;
- e. Maximize post-consumer recycled content, followed by percentage of recycled content;
- f. Recycle paper, cardboard and byproducts of production (example – plastic or metal)
- g. Reduce packaging and other waste;
- h. Are energy-efficient;
- i. Conserve water;
- j. Are reusable or durable;
- k. Minimize transportation (local sources, concentrated products); and
- l. Serve several functions (for example, copiers/printers, multipurpose cleaners) to reduce the overall number of products purchased.

In situations where the most environmentally preferable product is unavailable or impractical, secondary considerations will include production methods and the environmentally and socially responsible management practices of Suppliers and producers. Environmentally preferable purchasing is part of our long-term commitment to the environment.



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## 18. Conflict Minerals

Ensure that the use and sale of "Conflict Minerals" (whether on a stand-alone basis or contained in finished goods) do not contribute to the ongoing conflict in the "Covered Countries." For definition of both terms, see U.S. Department of State Conflict Minerals website ([www.state.gov/conflict-minerals](http://www.state.gov/conflict-minerals)). Perform a reasonable country of origin inquiry throughout your supply chain. Immediately notify Globe Tech in writing if you become aware of any warning signs that indicate conflict minerals from Covered Countries were used, and use best efforts to ensure Suppliers do not use minerals from forbidden sources.

Globe Tech created this Supplier Code of Conduct to ensure that our Suppliers adhere to high standards of safe working conditions, fair and respectful treatment of employees, ethical business practices and environmentalism. Suppliers must cooperate with reasonable requests for information, certifications, and audit access. When there is a concern, Globe Tech's practice is to work with our Supplier as a partner, and attempt to help, by identifying possible areas for improvements. However, when a Supplier is unwilling, or unable, to correct an issue, or unwilling to engage, we reserve the right to end the relationship. We strongly encourage our Suppliers to develop their own Code to ensure adherence. Please contact Globe Tech with any questions or concerns.

We appreciate our Suppliers and look forward to conducting fair and ethical business together.



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