



## SUPPLIER CODE OF CONDUCT

The Sierra Circuits Inc. Supplier Code of Conduct (“Supplier Code”) formalizes the key principles under which suppliers to Sierra Circuits Inc. and its global subsidiaries (“Sierra Circuits”) are required to operate.

In selecting suppliers, Sierra Circuits works hard to choose reputable business partners who are committed to ethical standards and business practices compatible with those of Sierra Circuits.

This Supplier Code makes clear that, while we recognize differences in cultures and legal requirements, we expect those producing products for us or performing services for us (collectively “suppliers”) do so in a manner aligned with the high standards and values representative of Sierra Circuits. It encompasses principles from the Defense Industry Initiative on Business Ethics and Conduct, the Electronic Industry Citizenship Coalition, the International Labor Organization, the Organization for Economic Co-operation and Development, the United Nations, AS 9100, ISO 9001, ISO 13485, and ISO 14001. Suppliers are required to comply with this Supplier Code and to have and maintain practices similar to Sierra Circuits Inc.

This Supplier Code applies to all Sierra Circuits Suppliers, and to all Supplier facilities that perform work for Sierra Circuits.

This Supplier Code is in no way intended to conflict with or modify the terms and conditions of any existing contract. In the event of a conflict, suppliers must first adhere to applicable laws and regulations, then the contract terms, followed by this Supplier Code of Conduct.

### **I. Laws and Regulations**

*We expect our suppliers to maintain full compliance with all laws and regulations applicable their business. When conducting international business, or if their primary place of business is outside the United States, suppliers must comply with local laws and regulations.*

### **II. Human Rights**

*We expect our suppliers to treat people with respect and dignity, encourage diversity in their workforce, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture.*

#### **Child Labor**

Sierra Circuits suppliers may not use child labor in the performance of work for Sierra Circuits. The term “child” refers to any person under the age of 15 or under the age for completing compulsory education, whichever is greater. Any hazardous work performed for Sierra Circuits must be done by individuals over the age of 18.



### Human Trafficking

We expect our suppliers to adhere to regulations prohibiting human trafficking and comply with all applicable local laws in the country or countries in which they operate. Suppliers must refrain from violating the rights of others and address any adverse human rights impact of their operations. Suppliers must educate employees on prohibited trafficking activities and provide avenues for raising issues or concerns about human trafficking without fear of retaliation.

### Conflict Minerals

If applicable, suppliers must adhere to U.S. federal laws and regulations requiring reporting companies to make specialized disclosure and conduct due diligence concerning their use of conflict minerals that may have originated in the Democratic Republic of the Congo or an adjoining country, as required by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. As a reporting company, under the Securities Exchange Act of 1934, Sierra Circuits must conduct due diligence of its suppliers concerning the source and chain of custody of conflict minerals contained in its products. We expect our suppliers to develop due diligence processes to support our reporting obligations and to cooperate fully in responding to our information requests. Sierra Circuits' Conflict Minerals Policy can be found at <https://www.protoexpress.com/content/quality.jsp>

## **III. Working Conditions**

*We expect our suppliers to practice mutual trust and respect in the workplace and provide a workplace free of rude, disrespectful, discriminatory, or harassing behavior. We expect our suppliers to ensure that all employment actions – including hiring, payment, benefits, training opportunities, advancement, discipline, termination, and retirement – are based on skills and job performance, and not on employees' personal characteristics or beliefs.*

### Fair Pay and Benefits

We expect our suppliers to meet local minimum wage and overtime pay requirements. Working hours must not exceed legal limits.

### Non-Discrimination

We expect our suppliers to provide equal employment opportunity to employees and applicants for employment, without regard to race, ethnicity, religion, color, sex, national origin, age, military veteran status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information, or mental or physical disability, so long as employees are able to competently perform the essential functions of their job, with or without reasonable accommodation.

### Harassment

We expect our suppliers to ensure that their employees are afforded an employment environment that is free from physical, psychological, and verbal harassment or other abusive conduct.



### Collective Bargaining

Suppliers must permit employees to independently choose whether to join a trade union or to participate in union activities, without supplier interference. Suppliers are expected to respect employee's choices, and to comply with applicable processes and laws on collective representation, bargaining, and consultation.

### Substance Abuse

We expect our suppliers to maintain a workplace free from illegal use, possession, sale, or distribution of controlled substances.

### Security

Sierra Circuits suppliers must protect worker health by providing a safe workplace and appropriate security measures.

## **IV. Anti-Corruption**

*We expect our suppliers to conduct appropriate levels of due diligence to prevent and detect corruption in all business arrangements, including their own supply-chain relationships, partnerships, joint ventures, offset agreements, and the hiring of consultants.*

### Anti-Corruption Laws

Our suppliers must comply with the anti-corruption laws, directives and/or regulations that govern operations in the countries in which they do business, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act.

### Improper Payments

The receipt, payment, and/or promise of monies or anything of value, directly or indirectly, intended to exert undue influence or to gain improper advantage is prohibited under this Supplier Code. Our suppliers must not offer any payments to, or receive any payments from, any government official, political party, candidate for public office, customer, supplier, agent, representative or others. This includes a prohibition on facilitation payments intended to expedite or secure performance of a routine governmental action, like obtaining a visa or customs clearance. This prohibition against improper payments applies even in locations where such payments are commonplace and do not violate local law.

### Gifts & Business Courtesies

We expect our suppliers to compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. In any business relationship, our suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulations, and that these exchanges do not violate the rules and standards of the recipient's organization, and are consistent with reasonable marketplace customs and practices.



## **V. Conflicts of Interest, Competitive Behavior, & Anti-Trust**

*We expect our suppliers to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with Sierra Circuits. We expect our suppliers to provide notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between the interests of our company and a supplier's personal interests or those of close relative, friends or other associate. In addition, we expect our suppliers to deal fairly with their customers, suppliers, competitors and employees, avoiding taking unfair advantage of such parties through manipulation, concealment or misuse of information or misrepresenting material facts.*

### Anti-Trust

Our suppliers must not fix prices or coordinate market conduct with competitors or their own suppliers in a way that improperly restricts competition. They must not exchange current, recent, or future pricing information with competitors. Our suppliers must refrain from participating in a cartel or any kind of association or arrangement that affects competition in a manner not allowed by the applicable laws and regulations.

### Insider Trading

Our suppliers and their personnel must not use material, non-public information obtained in the course of their work with Sierra Circuits as the basis for stock trading or to enable others to trade on inside information.

### Counterfeit Parts

We expect our suppliers to develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, to exclude them from the delivered product, and to provide notification to recipients of counterfeit products when warranted. For more information refer to Sierra Circuit's Counterfeit Control Policy at <https://www.protoexpress.com/content/quality.jsp>

Certificate of Compliance: When required by the purchase order the vendor will provide a Certificate with the following information

- The Original Manufacture of the part
- The Original Manufacture's address.
- The Original Manufacture's part number
- General description, functionality, or requirements of the part. This can include color, size, description, and any other technical specifications.

### Accurate Books & Records

We expect suppliers to create and maintain complete and accurate business transaction records, in accordance with applicable laws and contract terms, and to prevent alteration, concealment, or misrepresentation of those records. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. Upon request, all records of Sierra Circuits transactions must be made available to Sierra Circuits for review and audit.



## **VI. Information Protection**

*Suppliers must protect the confidential and proprietary information of others, including personal information, from unauthorized access, use, modification, disclosure, or destruction through appropriate physical and electronic security procedures. Suppliers must comply with all applicable data privacy laws. Suppliers shall ensure extension of this requirement to their own supply chain.*

### **Confidential/Proprietary information**

We expect our suppliers to properly handle sensitive information, including confidential, proprietary, and personal information. Information should not be used for any purpose other than the business purpose for which it was provided.

### **Intellectual Property**

We expect our suppliers to respect and comply with all the laws governing intellectual property rights, including intellectual property designated as a trade secret, as confidential, or that is subject to patents, copyrights, or trademarks restrictions.

## **VII. Global Trade Compliance**

*We expect our suppliers to comply with all applicable laws, directives, and regulations governing both the import and export of parts, materials, technical data, and services. This could include but not limited to International Traffic in Arms Regulations (ITAR) requirements.*

## **VII. Quality**

*Suppliers must take due care to ensure their work product meets Sierra Circuits' quality standards. We expect our suppliers to have in place quality assurance processes to identify defects and implement corrective actions, and to facilitate the delivery of a product whose quality meets or exceeds specifications and/or contractual requirements. Where applicable, suppliers are expected to flow down requirements to their supply chain.*

### **Changes in product or manufacturing procedures**

Any changes in the chemical and/or physical properties of a material or product that is being supplied to Sierra Circuits shall be preapproved before supplying that item.

The supplier shall notify Sierra Circuits of changes in the purchased product prior to implementation of any changes that affect the ability of the purchased product to meet specified purchase requirements.

Approval shall be in writing from Sierra Purchasing Department.

### **Certificate of Compliance, Conformance, or Analysis**

Sierra will require a Certificate of Compliance, Conformance, or Analysis for specific chemical, inks and materials. If required on the Purchase Order the vendor will supply the document with the shipment.



## **IX. Environment, Health & Safety**

*We expect our suppliers to operate in a manner that actively manages risk, conserves natural resources, and protects the environment. We expect our suppliers to apply environmental management system principles in order to establish a systematic approach to the management of risks/hazards and opportunities associated with the environment, including potential loss from regulatory non-compliance, reputational loss, and opportunities for business growth through operational and product stewardship.*

*We expect our suppliers to comply with all applicable environmental, health and safety laws, regulations, and directives. Suppliers should protect the health, safety, and welfare of their employees, visitors, and others who may be affected by their activities.*

Sierra Circuits is a ISO 14001 compliant company. Safety Data Sheets (SDS) must be submitted and approved by Sierra Circuits Environmental, Health & Safety (EH&S) Department prior to shipping the chemical.

## **X. Ethics Program**

*Commensurate with the size and nature of their business, we expect our suppliers to have management systems in place to support compliance with laws, regulations, and the expectations of this Supplier Code of Conduct.*

### **Ethics Policies**

We encourage our suppliers to have documented ethics and compliance policies, to implement their own code of conduct, and to flow down the principles of their code to their supply chain.

### **Non-Retaliation**

We expect our suppliers to provide their employees and contractors with avenues for raising legal or ethical issues or concerns without fear of retaliation. We expect our suppliers to take action to prevent, detect, and correct any retaliatory actions.

Suppliers' employees and contractors may raise suspected violations of this Code to the HR Department at Sierra Circuits Inc. at 1-408-735-7137

All such reports are treated as confidential, whether provided through telephone or website, and reporters may remain anonymous where permitted by law.