

# TranSpec Integrity Guide for Suppliers, Contractors and Consultants



## A Message from TranSpec

TranSpec Fasteners, Inc. (“TranSpec”) is committed to unyielding integrity and high standards of business conduct in everything we do, especially in our dealings with TranSpec suppliers, contractors and consultants (collectively “Suppliers”). TranSpec bases its Supplier relationships on lawful, efficient and fair practices, and Suppliers must adhere to applicable legal and regulatory requirements in their business relationships as set out in this **TranSpec Integrity Guide for Suppliers, Contractors and Consultants** (the “Guide”) in connection with their activities for TranSpec.

Suppliers are responsible to ensure that they and their employees, workers, representatives, suppliers and subcontractors comply with the standards of conduct set out in this Guide and in other contractual obligations to TranSpec. Please contact the TranSpec manager you work with or email [compliance@transpec.com](mailto:compliance@transpec.com) if you have any questions about this Guide or the standards of business conduct that all TranSpec Suppliers must meet.

## Responsibilities of TranSpec Suppliers

*You, as a Supplier to TranSpec, agree:*

**Fair Employment Practices:** (i) To observe applicable laws and regulations governing wages and hours; (ii) to allow workers to choose freely whether to organize or join associations for the purpose of collective bargaining as provided by local law or regulation; and (iii) to prohibit discrimination, harassment and retaliation.

**Environment, Health & Safety:** (i) To comply with applicable environmental laws and regulations; (ii) to provide workers a safe and healthy workplace; and (iii) not to adversely affect the local community.

**Human Rights** (i) To respect human rights of your employees and others in your business operations and your activities for TranSpec; (ii) not to employ workers younger than sixteen (16) years of age or below the applicable minimum age, whichever is higher; (iii) not to use forced, prison or indentured labor, or workers subject to any form of compulsion or coercion, or to engage in or abet trafficking in persons; and (iv) to adopt policies and establish systems to procure tantalum, tin, tungsten, and gold from sources that have been verified as conflict free, and to provide supporting data on your supply chain for tantalum, tin, tungsten, and gold to TranSpec when requested, on a platform to be designated by TranSpec.

**Working with Governments, Improper Payments and Dealings with TranSpec Employees and Representatives:** (i) To maintain and enforce a policy requiring adherence to lawful business practices, including a prohibition against bribery of government officials, (ii) not to offer or provide, directly or indirectly, anything of value, including cash, bribes, gifts, entertainment or kickbacks, including offers of employment, or participation in a contest, game or promotion, to any TranSpec employee, representative or TranSpec customer or to any government official in connection with any TranSpec procurement, transaction or business dealing, and (iii) to provide supporting data to TranSpec when requested.

**Competition Law:** Not to share or exchange any price, cost or other competitive information or engage in any collusive conduct with any third party with respect to any proposed, pending or current TranSpec procurement.

**Intellectual Property:** To respect the intellectual and other property rights of TranSpec and of third parties, including all patents, trademarks and copyrights.

**Security and Privacy:** (i) To respect privacy rights and secure the data of TranSpec employees, customers, and suppliers (collectively, “TranSpec Data”); and (ii) to implement and maintain physical, organizational and technical measures to ensure the security and confidentiality of TranSpec Data in order to prevent accidental, unauthorized or unlawful destruction, alteration, modification or loss of TranSpec Data; misuse of TranSpec Data; or unlawful processing of TranSpec Data; and protect Supplier operations and facilities against exploitation by criminal or terrorist individuals and organizations.

**Trade Controls & Customs Matters:** Not to transfer TranSpec technical information to any third party without the express, written permission of TranSpec, and to comply with all applicable trade control laws and regulations in the import, export, re-export or transfer of goods, services, software, technology or technical data including any restrictions on access or use by unauthorized persons or entities.

**Controllanship:** To ensure that all invoices and any customs or similar documentation submitted to TranSpec or governmental authorities or audited by third parties in connection with transactions involving TranSpec accurately describe the goods and services provided or delivered and the price thereof and ensure that all documents, communications and accounting are accurate and honest.

## How to Raise a Question or Concern

Subject to local laws and any legal restrictions applicable to such reporting, each TranSpec Supplier is expected to inform TranSpec promptly of any concern related to this Guide affecting TranSpec, whether or not the concern involves the Supplier, as soon as the Supplier has knowledge of such an occurrence. TranSpec Suppliers also must take such steps as TranSpec may reasonably request to assist TranSpec in the investigation of any such occurrence involving TranSpec and the Supplier.

**I. Define your question/concern:** Who or what is the concern? When did it arise? What are the relevant facts?

**II. Prompt reporting is crucial** — a question or concern may be raised by a TranSpec Supplier as follows:

- By discussing with a TranSpec Manager; OR
- By calling and asking to speak with an officer of TranSpec: **+1 800-451-8160**; OR
- By emailing [compliance@transpec.com](mailto:compliance@transpec.com).

**III. TranSpec Policy forbids retaliation** against any person reporting such a concern.