

## VT GROUP SUPPLIER CODE OF ETHICS

*“The VT Group Supplier Code of Ethics establishes the principles expected of our suppliers. Our goal is to work with suppliers that comply with these principles and require their manufactures and subcontractors to comply with these principles as well. The Code is made up of sections that outline standards for labor, health, safety, the environment, and standards relating to business ethics.”*

### **VT GROUP SUPPLIER CODE OF ETHICS**

All Sellers who accept a purchase order or subcontract agreement from VT Group certify that it has in place a similar policy for a Code of Ethics that embraces the standards set forth herein or that the seller shall adapt and make available the Code of Ethics set forth here to all employees:

By acceptance of any purchase order, subcontract, vendor business agreement, teaming agreement or consultant agreement, the “supplier” or teaming partner accepts the following standards of ethics, known as the “VT Group Supplier Code of Ethics” and acknowledges the mutual commitment between VT Group and itself to adhere to these standards.

#### **Supplier Relationships**

The standards set forth herein are expected of all suppliers to VT Group including any parent companies, other legal entities, partners, subcontractors, and employees of the supplier. This document shall be made available to all employees and subcontractors of the supplier in a local language that is understandable to the employee or subcontractor. VT Group expects the supplier to work with its own supply chain to ensure the principles and standards set forth in this code or an equivalent interpretation is met by its suppliers.

#### **Wages and Benefits**

VT Group Suppliers will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages; overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits.

#### **Nondiscrimination**

VT Group Suppliers will not discriminate in hiring and employment practices on grounds of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation, disability, or any other applicable protected category.

#### **Harassment**

VT Group Suppliers commit to provide a work environment free from unlawful harassment and discrimination, more specifically to include conduct deemed to be coercive; bullying, disruptive and or harassing, whether sexual or otherwise.

#### **Drug-Free Workplace**

VT Group Suppliers will provide a drug-free workplace, meaning the unlawful manufacture, distribution, dispensation, possession, or use of a controlled substance. Drug and alcohol use or possession on VT Group or our Customer facilities is forbidden and will result in immediate expulsion from the job. Suppliers are to inform all employees assigned to any applicable Purchase Order, contract, or subcontract of the provisions of this policy.

**Health and Safety**

VT Group Suppliers will provide their employees with a safe and healthy workplace in compliance with all applicable laws and regulations. Consistent with these obligations, Suppliers must have and implement effective programs that encompass life safety, incident investigation, chemical safety, ergonomics, etc., and provide the same standard of health and safety in any housing that is provided for employees. Suppliers should strive to implement management systems to meet these requirements.

**Protection of the Environment**

VT Group Suppliers will operate in a manner that is protective of the environment. At a minimum, Suppliers must comply with all applicable environmental laws, regulations and standards, such as requirements regarding chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits, and environmental reporting. Suppliers must also comply with any additional environmental requirements specific to the products or services being provided to VT Group as called for in design and product specifications, and contract documents. Suppliers should strive to implement management systems to meet these requirements.

**Laws, Including Regulations and Other Legal Requirements**

VT Group Suppliers will comply with all applicable laws and regulations in all locations where they conduct business.

**Ethical Dealings**

VT Group expects our Suppliers to conduct their business in accordance with the highest ethical standards. Suppliers must strictly comply with all laws and regulations on bribery, corruption, and prohibited business practices.

**Communications**

VT Group Suppliers must make the VT Group Supplier Code of Ethics and other relevant information available to employees in the native language(s) of the employees and supervisors.

**Monitoring/Record Keeping**

VT Group Suppliers must maintain documentation necessary to demonstrate compliance with the VT Group Supplier Code of Ethics Principles and must provide VT Group with access to that documentation upon VT Group's request.

**Deliverables/Products and Services**

VT Group Suppliers must ensure that all deliverables to VT Group and its end user complies with the purchase order and/or subcontract and contain no hidden hazards, known or unknown, which could jeopardize the safety of life, limb or property.