

This Code of Conduct defines expected ethical behavior by all Belcan suppliers. It requires and expects everyone to conduct business fairly, impartially and in full compliance with all laws and regulations. This Code of conduct outlines the basic requirements for all suppliers, contractors, consultants.

A. INTEGRITY

Maintain the highest standard of integrity in all business transactions.

B. COMPLIANCE WITH CODE AND LAWS

Suppliers are to conform with all applicable laws, regulations and the standards set forth in this Code.

C. PROTECT CONFIDENTIAL INFORMATION

Supplier shall use Belcan confidential information only as authorized and intended. Adequate internal controls must be in place to protect all written and printed data, technologies, and all other storage devices. This obligation continues after the relationship between Supplier and Belcan ends.

D. INTELLECTUAL PROPERTY

Suppliers shall protect Belcan and customers of Belcan's intellectual property. Unless otherwise provided in the agreement with Belcan, all ideas, inventions, methodologies, technologies, and business plans created by the Supplier for Belcan are the sole property of Belcan.

E. COMPLY WITH OUR CONTRACT

This Code is meant to complement the contract or purchase order, not to replace it. Any inconsistency between this Code and the provisions of the contract or purchase order, the provision will control.

F. AVOID CONFLICT MINERALS

Supplier shall make reasonable efforts to avoid the use of tantalum, tin, tungsten and/or gold ("Conflict Minerals"), in the making or supply of any products. Supplier agrees to communicate to its sub-suppliers its own commitment to responsible sourcing and legal compliance. Supplier agrees to cooperate and work with its sub-suppliers in an attempt to ensure traceability of Conflict Minerals.

G. SECURITY AND CYBERSECURITY

Supplier shall leverage an industry-standard security framework, such as a subset of the NIST 800-53 or ISO 27001.

In addition, Belcan's Customers frequently require contractors and subcontractors to provide appropriate security to safeguard Covered Defense Information (CDI) and Controlled Unclassified Information (CUI). In support of either CDI or CUI, the supplier shall comply with the following contract clauses:

- FAR 52.204-21 – This requires a contractor to implement 17 "basic safeguarding" controls from NIST SP 800-171, prior to award.
- DFARS 252.204-7012 – This requires full implementation of the 110 NIST SP 800-171 controls, prior to award, for systems with Controlled Unclassified Information or Covered Defense Information. This also requires that the supplier perform a self-assessment of their covered systems, complete a System Security Plan (SSP), and if needed, a Plan of Actions and Milestones (POA&M). The supplier must also have obtained the DIBNET incident reporting medium level of assurance hardware certificate.
- DFARS 252.204-7019 and -7020 – Prior to award, a supplier must have conducted, at minimum, a Basic Assessment of the 110 NIST SP 800-171 controls and reported the resulting scores and documentation in the Supplier Performance Rating System (SPRS).

H. CONFLICT OF INTEREST

Suppliers shall avoid conflicts of interest in their work for Belcan. Supplier may not negotiate or deal directly with any Belcan employee or contracted employee that has a financial interest in the supplier or whose relative, friend, romantic partner or household member holds a financial interest in the supplier.

Suppliers to avoid any behavior that would conflict with the Belcan employee Conflict of Interest policy, viewed [here](#).

I. ANTI-CORRUPTION AND BRIBERY

Supplier shall comply with the anti-corruption laws, directives, and regulations that govern operations in the countries in which they do business either directly or indirectly, including U.S. Foreign Corrupt Practices Act, the OECD Convention Against Bribery, the UK Bribery Act, and any other applicable laws. Supplier is required to refrain from promising, offering, or making, or authorizing or enabling any third party to offer or make on Supplier's behalf, any improper payments of money or any other thing of value to government officials, political parties, or candidates for public office.

J. RESPECT HUMAN RIGHTS

Supplier shall comply with applicable laws regarding minimum legal age requirements, equal opportunities, forced labor, working hours, fair wages, collective bargaining, and working conditions. Supplier and anyone in their supply chain will not participate in or condone human trafficking or slavery.

Treat all workers with respect and dignity. Suppliers must not engage in discrimination on any basis prohibited by applicable/local law and treat all employees and potential employees with equal opportunity.

K. HEALTH AND SAFETY

Suppliers shall provide a safe and healthy work environment free of harassment, discrimination, and retaliation. Suppliers are responsible for assuring that all workers, including employees, contractors and other third parties, are provided with a safe place to work and are qualified to perform their work functions safely. Suppliers shall have a policy and process in place for reporting workplace concerns.

L. SUSTAINABLE BUSINESS PRACTICES

Suppliers are to implement and maintain environmentally responsible business practices and must operate within the applicable environmental laws and regulations. Suppliers are encouraged to implement and disclose strategies that reduce their impact on the environment.

M. MAINTAIN ACCURATE BOOKS AND BUSINESS RECORDS

Supplier will create and maintain complete and accurate records and not alter any records to conceal or misrepresent the underlying transaction to which the record pertains. Records should be retained based on the applicable retention requirements.

N. QUALITY

Supplier must ensure the services or product meets high quality standards within their industry. Supplier shall develop, implement, and maintain policies and procedures to detect and avoid counterfeit electronic parts within their supply chain.

O. TRADE CONTROLS

Supplier shall understand and comply with all export, re-export and import laws and applicable trade sanctions.

P. USE OF BELCAN LOGO

Supplier must receive authorized written approval to use Belcan's name or logo in any marketing. The material where it is used must be truthful and accurate.

Q. REPORT VIOLATIONS OR CONCERNS

Suppliers who suspect a violation of this Code or other concern to be addressed should contact the Belcan Hotline at <https://www.belcan.com/contact-us/>