

## SUPPLIER CODE OF CONDUCT

Dwyer Instruments, LLC and any of its affiliated companies (collectively referred to as “DwyerOmega”), is committed to the highest standards of integrity and social responsibility, and we expect all of our Suppliers who provide; products, services, and materials, to be committed to these same guiding principles.



DwyerOmega’s Supplier Code of Conduct (SCC) outlines our expectations for our Suppliers and their own Supplier Network to achieve a responsible and ethical global Supply Chain by adhering to this guide and ensuring that they too have robust policies and procedures to support our guiding principles.

- **Human Rights, Forced Labor, Inclusion and Diversity**
- **Responsible Sourcing**
- **Supply Chain Security**
- **Management Systems**
- **Environmental, Health and Safety**
- **Business Integrity and Ethics**
- **Export Control**
- **Terms and Conditions**

### Human Rights, Forced Labor, Inclusion and Diversity

At DwyerOmega, we hold the safety, well-being, and dignity of every individual in high regard. We appreciate the invaluable contributions of individuals whose hard work and talents enable us to provide our products and services to our customers around the world. We expect our Supplier Partners to adhere to these same guiding principles.



#### Human Rights –

DwyerOmega requires all Suppliers to enact practices to maintain a respectful and safe workplace. To not tolerate physical violence, threats, corporal punishment, mental coercion, verbal abuse, bullying or harassment of any kind. DwyerOmega also expects our Suppliers’ compliance with all applicable local labor and wage laws.

#### Forced Labor –

DwyerOmega requires all Suppliers to comply with prohibitions on forced labor, including but not limited to; UN Anti-Slave Labor, EU Ban on Forced Labor and Uyghur Forced Labor Prevention Act (UFLPA) legislation. We require that all Suppliers and their employment agencies will not use slave labor, child labor, forced prisoner, bonded indentured or any other form of forced or coerced labor.

We also require that all Suppliers carefully monitor their entire supply chain to ensure that there is no forced, labor and specifically that no materials are sourced/produced in whole or in part from the Uyghur region of China.

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### Inclusion and Diversity –

DwyerOmega fosters an Inclusive culture and celebrates diversity. We believe that discrimination in any form should not be tolerated and expect these same policies be enacted by our Suppliers, ensuring compliance with all applicable laws and regulations relating to discrimination in hiring, employment practices, harassment, and retaliation.

### **Environmental, Health and Safety**



DwyerOmega expects our Suppliers to implement sound health and safety practices across business operations. We also expect our Supplier Network to be good stewards of the Earth and environment, ensuring they do all they can to protect the world in which we live, along with its valuable natural resources.

#### Environmental -

DwyerOmega is committed to reducing the impact of its operations on the environment and working with its Supplier Network to do the same. Suppliers must comply with all applicable environmental laws and regulations. We also expect our Suppliers to measure, manage and address energy usage and greenhouse gas (GHG) emissions and, where applicable, reduce water and waste in their operations.

#### Health and Safety -

DwyerOmega Suppliers will provide clean, healthy, and safe working environments for their personnel that meet or exceed legal standards. Suppliers will have safety procedures for their employees and tracking tools that drive to a goal of zero workplace safety incidents, providing needed safety training and PPE to their workforce to ensure their continued safety.

### **Responsible Sourcing**

DwyerOmega is dedicated to fair and ethical competition for our business. This includes a commitment to the sustainable and responsible sourcing of goods and services throughout your supply chain.



#### Conflict Minerals -

Consistent with DwyerOmega's company values, the goal of our Suppliers is to avoid sourcing minerals and raw materials that contributes to armed conflicts or human rights abuses. This includes minerals (commonly referred to as conflict minerals) that predominantly originate from Conflict Affected and High-Risk Areas (CAHRA), including the Democratic Republic of Congo and adjoining countries, current UN embargoed materials from Russia and China and other identified high-risk areas as detailed in the OECD Due Diligence Guidance. To this end, DwyerOmega requires all Suppliers to successfully complete and forward to DwyerOmega a Responsible Minerals Assurance Process (RMAP). These materials include, but are not limited to: Gold, Gallium, Germanium, Cobalt, Mica, Steel, Iron, Tin, Tantalum and Tungsten.

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### Resources –

DwyerOmega Suppliers shall respect the principles of free, prior, and informed consent regarding the resources and tenure rights of indigenous communities. In addition, DwyerOmega Suppliers shall conserve water and other natural resources in use in their operations, prevent contamination and reduce GHGs, minimize waste and reduce the impact on surrounding communities.

### **Business Integrity and Ethics**



DwyerOmega calls for our Suppliers to uphold the highest standards of integrity in all business interactions. Suppliers will avoid conflicts of interest and operate openly and ethically throughout the supply chain and in accordance with all applicable laws. This includes laws pertaining to intellectual property, anti-competitive business practices, company or personal data, export controls, economic sanctions as well as contractual terms, including but not limited to those governing ITAR-controlled activities.

### Anti-Corruption –

DwyerOmega will not tolerate corruption, bribery, extortion, embezzlement, or fraud in any form. This includes but is not limited to; giving or receiving anything of value, including money, gifts or other unlawful incentives to improperly influence negotiations or win business with any private or government body, including DwyerOmega.

### Intellectual Property and Assets–

Suppliers will safeguard all DwyerOmega intellectual property, ensuring adequate measures are in place to prevent the transfer or theft of technology (data piracy), designs, blueprints, bills of materials, financial information, or trade secrets outside of their organization to any restricted or unauthorized party.

DwyerOmega Suppliers will also ensure that any physical property owned/provided by DwyerOmega to their respective Suppliers is controlled and protected from theft, damage, reverse engineering, or sabotage.

No Supplier will be permitted to share any proprietary design, technology, software, manufacture, or process information of parts or machinery/dies without prior written consent from DwyerOmega.

### Prohibition of Malpractice and Fraud

Suppliers and their sub-tiers shall remain vigilant in preventing Malpractice, Fraud, and Falsification (F&F). This includes, but is not limited to, the falsification, concealment, or alteration of material facts; the submission of false or misleading documentation; or any other fraudulent or fictitious misrepresentation in connection with ITAR-controlled activities.



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- Any such malpractice is strictly prohibited by company policy and may subject the offender to disciplinary action, contract termination, civil liability, and/or criminal prosecution under applicable U.S. law.
- Any act of falsification, concealment, gross mistake tantamount to fraud, or fraudulent misrepresentation in the performance of ITAR-controlled work is a direct violation of both company policy and U.S. law. Such conduct will not be tolerated and will be reported to the appropriate regulatory and legal authorities as required.
- Suppliers must ensure that their employees and sub-tier suppliers are provided with all documentation, training materials, and communication necessary to comply with ITAR requirements and this policy, including letters, posters, or other required compliance notices.

### Supply Chain Security

DwyerOmega is committed to ensuring that all international shipments are moved in the most secure and safe manner to prevent contraband or other illicit activities.

#### Supply Chain Security –

DwyerOmega Suppliers will comply with all applicable restrictions and controls related to supply chain security, including but not limited to; facility security, conveyance security, shipping and receiving security, personnel security, and cyber security.

We strongly recommend and encourage all Suppliers to participate in the CTPAT program or other equivalent supply chain security programs in various countries.

### Export Control

DwyerOmega is dedicated to compliance with all export control requirements in all countries, including restricting exports to denied individuals, entities and prohibited and sanctions countries.

#### Export Controls -

DwyerOmega Suppliers will comply with all applicable restrictions and controls related to export, re-exports, release or other transfer of goods, software, services, and technology. DwyerOmega Suppliers shall also comply with all applicable economic sanctions/restrictions involving certain regions, entities, individuals and end uses, and all other similar trade related laws and regulations. This includes conducting appropriate investigations and screening any third parties with whom they may engage and trade with.

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### Management Systems

DwyerOmega expects its Suppliers to develop and have in place robust systems and practices that safeguard our supply chain. These systems should support the preceding mandates pertaining to protecting confidential information, employees, trade compliance and environmental compliance. In addition, DwyerOmega Suppliers shall avoid any situations that adversely affect DwyerOmega's business interests or reputation.



Suppliers must be able to demonstrate, upon request, their compliance with DwyerOmega's SCC and will undertake any necessary actions to correct any/all non-compliance. As and when requested, Suppliers will complete questionnaires and participate in on-site assessments or audits.

Successful management systems will contain the following elements:

#### Leadership Commitment –

Suppliers will identify senior executives and/or company representatives that are responsible for ensuring implementation of the management systems and programs. DwyerOmega recommends that said leadership performs at least an annual review of these systems to ensure compliance.

#### Risk Assessment –

Suppliers will have processes and procedures in place to identify and control risks; ensure legal compliance, environmental, health, safety, labor practices and ethics risks along with robust Quality Assurance. These are to include, but are not limited to, ensuring training on the adherence to the controls and safeguards outlined above which Suppliers shall provide to new and current employees for their review and compliance with DwyerOmega's SCC.

#### Information Technology –

Suppliers will ensure/enact IT systems and processes that will safeguard and prevent the sourcing of materials, minerals and supplies from any sanctioned, embargoed or restricted areas, companies or individuals. Conversely, Suppliers will be able to provide full traceability of any said commodities upon request, to ensure their due diligence. Suppliers shall take all necessary measures to prevent the theft and transfer of confidential information as outlined above, including the implementation of sufficient cyber security controls.

#### Terms and Conditions –

DwyerOmega has clearly defined Terms and Conditions that identify responsibilities, legal requirements, and remedies for redress for both parties.

By accepting purchase orders from DwyerOmega, Dwyer Instruments, Inc. or Omega Engineering, Inc. or any of its affiliates, Suppliers agree to honor and be bound by these Terms and Conditions. DwyerOmega will ensure that these Terms and Conditions are transmitted with each Purchase Order transmittal and will make every effort to post them on our website(s).



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DwyerOmega also expects its Suppliers to cooperate and comply fully with the principles and standards set forth in our SCC. Failure to cooperate and comply fully with the guidelines outlined in our SCC or failure to implement corrective actions or cease activities with severe impacts may result in the modification or termination of the business relationship. Both the Supplier and DwyerOmega agree to comply with the principles, standards, requirements, and responsibilities included in this DwyerOmega Supplier Code of Conduct.



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### Supplier Acknowledgement and Agreement

I/we the undersigned of \_\_\_\_\_ are duly authorized  
(Supplier Name)

representatives of the above company and hereby certify that I/we have read, understand, and accept DwyerOmega's Supplier Code of Conduct and will make every effort to comply with the SCC as outlined above.

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COMPANY NAME: \_\_\_\_\_

VENDOR NUMBER: \_\_\_\_\_

"TRADE AS" NAME: \_\_\_\_\_

(If different from above)

#### Signatories:

Name: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_

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Should DwyerOmega not receive a signed/written response from you within 7 business days after transmittal of this Supplier Code of Conduct, it will be evidence that you agree to comply with all areas as outlined.

You also agree to alert DwyerOmega if/when compliance issues are discovered in your company's Supply Chain or Business Practices, that contravene DwyerOmega's stated goal to achieve and maintain an ethical global Supply Chain.

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