	P110	CODE OF CONDUCT / ETHICS
	Rev. NC	Manage Business and Support
	Operation Leaders:	Operations, HR, EHS, Quality
	Page 1 of 14	

1.0 PURPOSE

- This document constitutes Fralock's Code of Conduct-Ethics and policy statements regarding its business ethics. This includes anti-corruption policies as reflected throughout this document.

2.0 SCOPE

- This document applies to Fralock to ensure that the organization operates within the laws, rules, and regulations of the states, counties, and countries in which it operates.

3.0 RELATED DOCUMENTS

- Responsible Business Alliance (RBA) Code Of Conduct.

4.0 DEFINITIONS

- Whistleblower definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.


5.0 RESPONSIBILITIES

- Operations, HR, EHS, and Quality department leaders have the overall responsibility to oversee the implementation and maintenance of this document.

6.0 PROCEDURE

6.1 OVERVIEW

- 6.1.1 Fralock is committed to the highest standards of ethics and business conduct.
- 6.1.2 Employees will comply with the law, honor their commitments, act in good faith, uphold the organization's values, seek to advance the interests of stakeholders, communicate openly and effectively, and hold themselves accountable.
- 6.1.3 Fralock expects its suppliers to provide superior products and services in a responsible manner and requires them to meet its expectations for ethics and compliance. Fralock expects that product and service suppliers will have their own internal codes of ethics and conduct. This expectation has been flowed down to suppliers through the Purchase Order clauses and the suppliers' terms and conditions.
- 6.1.4 This Code is not intended to be an exhaustive list of all ethical and business conduct requirements to be followed by Fralock.
- 6.1.5 Fralock will work with top management, officers, employees, representatives, and business partners to understand and comply with the expectations set forth in this Code.
- 6.1.6 The expectations set forth in this Code are not intended to conflict with or modify

	P110	CODE OF CONDUCT / ETHICS
	Rev. NC	Manage Business and Support
	Operation Leaders:	Operations, HR, EHS, Quality
	Page 2 of 14	

the terms and conditions of Fralock's contracts with its customers. If a contract requirement is more restrictive than this Code, Fralock will comply with the more restrictive contract requirement, including any governmental requirements, contracts, and/or Federal Acquisition Regulations (FARs).

6.2 COMPLIANCE WITH LAWS


6.2.1 Fralock maintains compliance with all laws and regulations applicable to the operation of its business and its relationship with its customers, suppliers, and interested parties.

6.3 INTERNATIONAL TRADE COMPLIANCE

6.3.1 Fralock conducts business in compliance with all applicable laws and regulations governing (a) the export, re-export and retransfer of goods, technical data, software and services; (b) import of goods; (c) economic sanctions and embargoes; and (d) U.S. antiboycott requirements.

6.4 COMPETITION ON THE MERITS AND FAIR PLAY / ANTI-CORRUPTION

- 6.4.1 Fralock competes strictly on the basis of the merits of its products and services.
- 6.4.2 Fralock does not pay a bribe in any amount, to anyone, anywhere, for any reason whatsoever, whether on its behalf, its customers' behalf, or on behalf of others. Accordingly, Fralock never offers, promises, authorizes, or provides, directly or indirectly, anything of value (including business gifts or courtesies) with the intent or effect of inducing anyone (including a customer, a customer's employee, or higher tier or sub-tier supplier) to forego its duties and provide unfair business advantage to Fralock, its customers, suppliers, or others.
- 6.4.3 Fralock does not engage in any anti-competitive conduct for any reason whatsoever, whether on its behalf, its customers' behalf, or on behalf of others. Accordingly, Fralock never rigs bids, fixes prices, or allocates customers or markets, or exchanges Fralock or its customers' competitively sensitive information (e.g., price, cost, output) with its competitors or its customers' competitors.
- 6.4.4 Fralock refrains from abusing its market power, whether for its benefit or for the benefit of others, by refusing to deal, engaging in predatory or discriminatory pricing practices, conditioning the sale or provision of a particular product or service with that of another product or service, or undertaking similar abusive tactics.

	P110	CODE OF CONDUCT / ETHICS
	Rev. NC	Manage Business and Support
	Operation Leaders:	Operations, HR, EHS, Quality
	Page 3 of 14	

6.4.5 Fralock does not engage in other deceptive or unfair market practices, whether on its behalf, its customers' behalf, or on behalf of others. Accordingly, Fralock never makes misrepresentations regarding its products or services, its customers' products or services, or the products or services of others. Similarly, Fralock never denigrates its competitors, its customers' competitors, or its products or services.

6.5 CONFLICT OF INTEREST / ANTI-CORRUPTION

6.5.1 Fralock avoids all conflicts of interest or situations giving the appearance of a conflict of interest in its dealings with its customers and suppliers.

6.5.2 Fralock reports to its customers any instances involving actual or apparent conflicts of interest between its interests and those of its customers, such as when one of its employees (or someone close to one of its employees) has a personal relationship with a customer employee who can make decisions impacting its business, or when a customer employee has an ownership or financial interest in its business.

6.6 LABOR

Fralock is committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

Fralock complies with laws and regulations prohibiting human trafficking. Fralock does not engage in the use of forced labor, bonded labor, indentured labor, involuntary prison labor, slavery, or trafficking in persons.

This may include the following labor standards, as applicable:

6.6.1 Freely Chosen Employment


6.6.1.1 Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.

6.6.1.2 As part of the hiring process, workers receive documentation that will include information such as description of terms and conditions of employment.

6.6.1.3 All work is voluntary and workers are free terminate their employment without penalty if reasonable notice is given as per worker's contract.

6.6.1.4 Employers, agents, and sub-agents may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits.

6.6.1.5 Employers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents.

	P110	CODE OF CONDUCT / ETHICS
	Rev. NC	Manage Business and Support
	Operation Leaders:	Operations, HR, EHS, Quality
	Page 4 of 14	

6.6.2 Child Labor / Young Workers

- 6.6.2.1 Child labor is not to be used in any stage of operations. The term “child” refers to any person under the age of fifteen (15), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.
- 6.6.2.2 Fralock implements an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported.
- 6.6.2.3 Workers under the age of 18 (Young Workers) will comply to all the local labor laws.
- 6.6.2.4 Fralock ensures proper management of student workers through proper maintenance of student records, due diligence of educational partners, and protection of students’ rights in accordance with applicable laws and regulations.

6.6.3 Working Hours


- 6.6.3.1 Studies of business practices clearly link worker strain to reduced productivity, increased turnover, and increased injury and illness. Working hours are not to exceed the maximum set by local law.
- 6.6.3.2 A workweek is not typically more than 60 hours per week, including overtime.

6.6.4 Wages and Benefits

- 6.6.4.1 Compensation paid to workers will comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.
- 6.6.4.2 In compliance with local laws, workers will be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure will not be permitted.
- 6.6.4.3 Workers have access or can request an understandable wage statement that includes sufficient information to verify accurate compensation for work performed.
- 6.6.4.4 All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

6.6.5 Humane Treatment

- 6.6.5.1 There is to be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment.
- 6.6.5.2 Disciplinary policies and procedures in support of these requirements are in place either by company policy or local laws and are available for review as required.

	P110	CODE OF CONDUCT / ETHICS
	Rev. NC	Manage Business and Support
	Operation Leaders:	Operations, HR, EHS, Quality
	Page 5 of 14	

6.6.6 Non-Discrimination/Non-Harassment

- 6.6.6.1 Fralock is committed to a workplace free of harassment and unlawful discrimination.
- 6.6.6.2 Fralock does not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training.
- 6.6.6.3 Fralock treats its existing and prospective employees and business partners fairly, based only on merit and other factors related to their legitimate business interests, and without regard to race, religion, color, age, gender, gender identity or expression, sexual orientation, national origin, marital status, veteran status or disability.
- 6.6.6.4 Fralock provides reasonable accommodation for religious practices.
- 6.6.6.5 Workers or potential workers should not be subjected to medical tests, including pregnancy, or physical exams that could be used in a discriminatory way.

6.6.7 Freedom of Association


- 6.6.7.1 In conformance with local law, Fralock respects the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly, as well as respect the right of workers to refrain from such activities.
- 6.6.7.2 Workers and/or their representatives can openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

6.7 QUALITY

Fralock's products and services are handled and delivered with the paramount consideration being the safety and health of its employees and consumers. Fralock established and implemented quality assurance processes and procedures to detect, communicate to its customers and suppliers, and correct defects to ensure delivery of products and services that meet or exceed contractual quality, legal, and regulatory requirements.

6.8 HEALTH AND SAFETY

Fralock not only complies with all applicable environmental, health and safety laws, regulations, and directives, but also conducts its operations in a manner that safeguards the environment and minimizes waste, emissions, energy consumption, and the use of materials of concern. Fralock also assures safe and healthy work environments for its employees and business invitees.

	P110	CODE OF CONDUCT / ETHICS
	Rev. NC	Manage Business and Support
	Operation Leaders:	Operations, HR, EHS, Quality
	Page 6 of 14	

Fralock recognizes that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale.

Fralock also recognizes that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace.

This may include the following health and safety standards, as applicable:

6.8.1 Occupational Safety

6.8.1.1 Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) are to be identified and assessed, mitigated, which includes eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and providing ongoing occupational health and safety training.

6.8.1.2 Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards.

6.8.1.3 Reasonable steps maybe be taken to remove pregnant women and nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers.

6.8.1.4 Reasonable accommodations will be made for nursing mothers.

6.8.2 Emergency Preparedness

6.8.2.1 Potential emergency situations and events are addressed in accordance with Fralock's policies and procedures.


6.8.3 Occupational Injury and Illness

6.8.3.1 Procedures and systems are to be in place to prevent, manage, track, and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work.

6.8.4 Industrial Hygiene

6.8.4.1 Worker exposure to chemical, biological, and physical agents is to be identified, evaluated, and controlled. If any potential hazards were identified, management will look for opportunities to eliminate and/or reduce the potential hazards.

6.8.4.2 If elimination or reduction of the hazards is not feasible, potential hazards are to be controlled through proper design, engineering, and administrative controls.

	P110	CODE OF CONDUCT / ETHICS
	Rev. NC	Manage Business and Support
	Operation Leaders:	Operations, HR, EHS, Quality
	Page 7 of 14	

6.8.4.3 When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment free of charge.

6.8.5 Physically Demanding Work

6.8.5.1 Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks is to be identified, evaluated, and controlled.

6.8.6 Machine Safeguarding

6.8.6.1 Production and other machinery will have physical guards, interlocks, and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

6.8.7 Sanitation, Food, and Housing

6.8.7.1 Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities.

6.8.7.2 When applicable, worker dormitories provided by Fralock or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting and heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

6.8.8 Health and Safety Communication

6.8.8.1 Fralock provides workers with appropriate workplace and health and safety information and awareness.

6.8.8.2 Health and safety related information will be clearly posted in the facility or placed in a location identifiable and accessible by workers.

6.8.8.3 Awareness and/or training are provided to all workers prior to the beginning of work and regularly thereafter, as needed.

6.8.8.4 Workers are encouraged to raise any health and safety concerns without retaliation.


6.9 ENVIRONMENT

Fralock recognizes that environmental responsibility is integral to producing world-class products.

This may include the following environmental standards, as applicable:

6.9.1 Environmental Permits and Reporting

6.9.1.1 All required environmental permits (e.g., discharge monitoring), approvals, and registrations are to be obtained, maintained, and kept

	P110	CODE OF CONDUCT / ETHICS
	Rev. NC	Manage Business and Support
	Operation Leaders:	Operations, HR, EHS, Quality
	Page 8 of 14	

current and their operational and reporting requirements are to be followed.

6.9.2 Pollution Prevention and Resource Reduction

6.9.2.1 Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means.

6.9.2.2 The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

6.9.3 Hazardous Substances

6.9.3.1 Chemicals, waste, and other materials posing a hazard to humans or the environment are to be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

6.9.4 Solid Waste

6.9.4.1 Fralock handles solid waste per applicable laws and regulations.

6.9.5 Air Emissions

6.9.5.1 Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are to be characterized, routinely monitored, controlled, and treated as required prior to discharge.

6.9.5.2 Ozone-depleting substances are to be effectively managed in accordance with applicable regulations.

6.9.6 Materials Restrictions

6.9.6.1 Fralock adheres to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.


6.9.7 Water Management

6.9.7.1 Wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal.

6.9.8 Energy Consumption and Greenhouse Gas Emissions

6.9.8.1 When required, Fralock will establish a corporate-wide greenhouse gas reduction goal.

6.9.8.2 When required, energy consumption and relevant greenhouse gas emissions are to be tracked, documented, and publicly reported against the greenhouse gas reduction goal.

	P110	CODE OF CONDUCT / ETHICS
	Rev. NC	Manage Business and Support
	Operation Leaders:	Operations, HR, EHS, Quality
	Page 9 of 14	

6.10 ETHICS / ANTI-CORRUPTION

To meet social responsibilities and to achieve success in the marketplace, Fralock and its agents are to uphold the highest standards of ethics including:

6.10.1 Business Integrity

- 6.10.1.1 The highest standards of integrity are to be upheld in all business interactions.
- 6.10.1.2 Fralock has a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion, and embezzlement.

6.10.2 No Improper Advantage

- 6.10.2.1 Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted.
- 6.10.2.2 This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

6.10.3 Disclosure of Information


- 6.10.3.1 All business dealings should be transparently performed and accurately reflected on Fralock's business books and records.
- 6.10.3.2 Information regarding labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices.
- 6.10.3.3 Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

6.10.4 Information Protection

- 6.10.4.1 Fralock respects the legitimate proprietary rights and intellectual property rights of its customers and others.
- 6.10.4.2 Fralock takes proper care to protect sensitive information, including confidential, proprietary, and personal information.
- 6.10.4.3 Fralock does not use such information for any purpose other than the business purpose for which it was provided, unless the owner of the information provided prior authorization.

6.10.5 Intellectual Property

- 6.10.5.1 Intellectual property rights are to be respected, transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information is to be safeguarded.

	P110	CODE OF CONDUCT / ETHICS
	Rev. NC	Manage Business and Support
	Operation Leaders:	Operations, HR, EHS, Quality
	Page 10 of 14	

6.10.6 Accuracy of Records and Submissions

6.10.6.1 Fralock will never make any entry in its books and records or alters, conceals, or destroys any document to misrepresent any fact, circumstance, or transaction related to customer business.

6.10.7 Fair Business, Advertising and Competition

6.10.7.1 Standards of fair business, advertising, and competition are to be upheld.

6.10.8 Protection of Identity and Non-Retaliation

6.10.8.1 Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law.

6.10.8.2 Fralock has a communicated process for its personnel to be able to raise any concerns without fear of retaliation.

6.10.9 Responsible Sourcing of Minerals

6.10.9.1 As required, Fralock will exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

6.10.10 Privacy


6.10.10.1 Fralock is committed to protecting the reasonable privacy expectations of personal information of everyone it does business with, including suppliers, customers, consumers, and employees.

6.10.10.2 Fralock complies with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

6.11 MANAGEMENT SYSTEMS / ETHICS & COMPLIANCE PROGRAM

Commensurate with the size and nature of its business, Fralock established management systems and ensures that tools and processes are in place to:

- a) Ensure compliance with applicable laws, regulations and the requirements set forth in this Code;
- b) Promote an awareness of and commitment to ethical business practices, including, without limitation, the expectations set forth in this Code;
- c) Facilitate the timely discovery, investigation, disclosure (to interested parties such as customers, suppliers, regulators, and others, as appropriate) and implementation of corrective actions for violations of law, regulations or the expectations set forth in this Code;

	P110	CODE OF CONDUCT / ETHICS
	Rev. NC	Manage Business and Support
	Operation Leaders:	Operations, HR, EHS, Quality
	Page 11 of 14	

- d) Provide awareness to its employees on compliance requirements, including the expectations set forth in this Code, as needed.

Fralock has established management systems with a scope that is related to the content of this Code.

The management system are be designed to ensure:

- a) Compliance with applicable laws, regulations and customer requirements related to the site operations and products;
- b) Conformance with this Code;
- c) Identification and mitigation of operational risks related to this Code.

The management system should also facilitate continual improvement.

The management system should contain the following elements, as applicable:

6.11.1 Company Commitment

- 6.11.1.1 Corporate social and environmental responsibility policy statements affirming Fralock's commitment to compliance and continual improvement, endorsed by executive management, are communicated to personnel and may be posted in the facility in the local language.

6.11.2 Management Accountability and Responsibility


- 6.11.2.1 Fralock has clearly identified senior executive and company representatives responsible for ensuring implementation of the management systems and associated programs.

6.11.3 Legal and Customer Requirements

- 6.11.3.1 Fralock has established and maintains a process to identify, monitor, and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.

6.11.4 Risk Assessment and Risk Management

- 6.11.4.1 Fralock has established and maintains a process to identify the legal compliance, environmental, health and safety, and labor practice and ethics risks associated with its operations.
- 6.11.4.2 Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.
- 6.11.4.3 Areas to be included in the risk assessment for environmental health and safety are production areas, warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen/cafeteria, and worker rest areas, as applicable.
- 6.11.4.4 As needed, Fralock has established and maintains risk and opportunity management procedures and risk and opportunity registers relevant to the sites to identify, mitigate, and document such risks.

	P110	CODE OF CONDUCT / ETHICS
	Rev. NC	Manage Business and Support
	Operation Leaders:	Operations, HR, EHS, Quality
	Page 12 of 14	

6.11.5 Improvement Objectives

6.11.5.1 Fralock has established and maintains written performance objectives, targets, and implementation plans to improve social, environmental, and health and safety performance, including a periodic assessment of the performance in achieving those objectives.

6.11.6 Training

6.11.6.1 Fralock has established and maintains programs for training managers and workers to implement policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.

6.11.7 Communication

6.11.7.1 Fralock established and maintains a process for communicating clear and accurate information about its policies, practices, expectations, and performance to workers, suppliers, and customers.

6.11.8 Anonymous Reporting, Reporting Misconduct, Worker Feedback, Participation and Grievance

6.11.8.1 Fralock provides its employees and its business partners with access to adequate reporting channels to raise legal or ethical issues or concerns, including, without limitation, reports of a violation of this Code by Fralock, or its business partners, without fear of retaliation, including opportunities for anonymous reporting.

6.11.8.2 Fralock established and maintains ongoing processes, including an effective grievance mechanism, to assess workers' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement.

6.11.8.3 Fralock provides workers a safe environment to provide grievance and feedback without fear of reprisal or retaliation.


6.11.8.4 A dedicate third party hotline has been established and communicated to personnel.

6.11.8.5 In the event that Fralock becomes aware of misconduct related to customer business undertaken by any customer employee, any of its employees, or any employees of its business partners. Fralock will promptly investigate reports of legal or ethical issues or concerns.

6.11.9 Code Compliance

6.11.9.1 In accordance with contractual requirements, Fralock

- a) Permits its customers and/or its representatives to assess its compliance with the expectations set forth in this Code in performing work for the customers, including on-site

	P110	CODE OF CONDUCT / ETHICS
	Rev. NC	Manage Business and Support
	Operation Leaders:	Operations, HR, EHS, Quality
	Page 13 of 14	

inspection of facilities and review of associated books, records, and other documentation;

- b) Provides its customers, upon request, with additional information and certifications evidencing compliance;
- c) Ensures that its customers have the right to assess their suppliers and business partners' compliance with the expectations set forth in this Code in performing work for customers, including on-site inspection of facilities and review of associated books, records, and other documentation;
- d) Ensures that its suppliers and business partners will provide the customers upon request with additional information and certifications evidencing compliance.

6.11.9.2 In the event of any wrongdoing, Fralock will cooperate with related investigation conducted by its customers.

6.11.9.2.1 Fralock will ensure that its suppliers and business partners also fully cooperate if such investigation involves their performance.

6.11.9.3 Fralock and its suppliers and business partners correct any nonconformances identified during such assessments.

6.11.9.4 Fralock acknowledges and agrees that it is solely responsible for full compliance with this Code by its directors, officers, employees, representatives, suppliers, and business partners.

6.11.10 Audits and Assessments

6.11.10.1 Periodic self-evaluations may be performed to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.

6.11.11 Corrective Action Process

6.11.11.1 Fralock established and maintains a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

6.11.12 Documentation and Records

6.11.12.1 Fralock established and maintains a process for the creation and maintenance of documents and records to ensure regulatory compliance and conformity to requirements along with appropriate confidentiality to protect privacy.

6.11.13 Supplier Responsibility

6.11.13.1 Fralock established and maintains a process to communicate ethics requirements to suppliers and to monitor supplier compliance.

6.11.13.2 Supplier responsibility and Fralock expectation have been flowed down to suppliers through the Purchase Order clauses and the suppliers' terms and conditions.

6.11.14 Fralock has assigned a management representative, or an ethics and compliance officer with responsibility for assuring and facilitating compliance with current business Ethics laws, regulations and codes (e.g., bribery, corruption).

6.12 GOVERNMENT PROCUREMENT

6.12.1 Fralock takes special care to comply with the unique and special rules that apply to contracting with the U.S. Government.

6.12.2 If Fralock supports a customer contract with the U.S. Government, it will follow the U.S. Government's rules for competing fairly, honor restrictions applying to U.S. Government employees (e.g., receipt of gifts and employment), deliver products and services that conform to specifications, laws and regulations, adhere to government accounting and pricing requirements, claim only allowable costs, ensure the accuracy of data submitted and comply with all other applicable U.S. Government requirements.

6.13 BUSINESS PARTNERS / ANTI-CORRUPTION

6.13.1 If Fralock contract with its customers prohibits assigning, delegating, or subcontracting its obligations, Fralock strictly complies with this prohibition.

6.13.2 If Fralock's contract with its customers permits assigning, delegating, or subcontracting its obligations or procure products or services from others that will be incorporated in products or services acquired by customers, Fralock carefully selects its business partners and performs due diligence, audit, and/or oversight to prevent and detect misconduct.

6.13.3 Fralock flows down the principles set forth in this Code to its suppliers and appropriate business partners.

7.0 RECORDS/PROCESS OUTPUT

- Records generated under this procedure are handled in accordance with documented policies and procedures.

8.0 HISTORY OF REVISIONS

Date	Revision	Description
8/04/2022	NC	INITIAL RELEASE