

Title: Supplier/Vendor Code of Conduct
Release Date: July 9, 2024
Department: Global Supply Chain
Scope: Global



OFS Fitel, LLC and its affiliates (collectively “OFS”) are committed to an elevated level of ethics, respect and dignity for our employees [in all of our business operations. OFS values your business and trusts that your company shares our commitment to always doing business the right way. We expect OFS contractors, suppliers, and consultants (“Vendors”) to adopt their own, comparable ethical principles. By executing any contract, supplying materials, or performing any work or services for OFS, you, as a Vendor, agree and acknowledge that you shall perform to the highest level of business and professional ethics, and adhere to the following guidelines for ethical and social responsibility conduct. These requirements are in addition to any requirements and obligations in any request for proposal, agreement or contract between Vendor and OFS and Vendor’s own Code of Business Conduct.

Vendors Must:

Ethical Business Practices:

- Conduct their business ethically, adhering to all applicable laws and regulations.
- Avoid engagement in bribery, corruption, nor violate applicable sanctions requirements or engage in any other illegal practices.
- Avoid engagement in conflicts of interest or unfair competition practices.
- Review OFS’ Corporate Social Responsibility Policy located on its website at <https://www.ofsoptics.com/our-values>, and comply with that policy.

Labor Practices:

- Ensure fair labor practices, fair wages, reasonable work hours, and a safe working environment.
- Prohibit any form of forced or child labor, human trafficking, nor foster labor conditions that violate recognized standards.

Confidentiality and Data Security:

- Safeguard all confidential information and trade secrets of OFS and its affiliates and consent to OFS’ Privacy Policy which is set forth on its website at <http://www.ofsoptics.com/privacy>.
- Adhere to all applicable data protection laws.
- Implement robust cybersecurity measures to protect against data breaches.

Social Media, Use of Artificial Intelligence Tools, Cyber Security:

- Use Social Media in a productive and respectful manner.
- Only use and/or provide artificial intelligence (AI) or generative AI (GenAI) responsibly, with due care, and with industry best practices focused on promoting safe, secure, and trustworthy AI.
- Comply with all applicable laws pertaining to AI, including, but not limited to, all applicable privacy laws, and shall not infringe upon any rights, including but not limited to, any intellectual property rights.
- Take measures to combat cybersecurity attacks including but not limited to having a business continuity plan in place.

Diversity and Inclusion:

- Promote diversity and inclusion within its workforce.
- Promote an inclusive workplace where every individual, regardless of background, is valued, respected, and given equal opportunities to succeed, because diversity is not just a goal but a fundamental strength that fuels innovation, creativity, and success.
- Avoid discrimination and provide a work environment free from discrimination based on race, color, religion, national origin, sex, age, disability, sexual preference or orientation, marital status, or any unlawful factor.
- Comply with applicable human rights and employment equity legislation, and do not discriminate unlawfully in any aspect of employment, including recruiting, hiring, compensation, promotion, or termination.
- Do not permit conduct that creates an intimidating or offensive work environment. Such conduct includes, but is not limited to, racist, sexist, ethnic, or homophobic comments or jokes; sexual advances or inappropriate physical contact; or sexually oriented gestures, pictures, jokes or statements.

Quality and Safety Standards:

- Provide products and services that meet high-quality standards in accordance with OFS' acceptance criteria and all applicable laws and regulations.
- Demonstrate evidence of safety programs, including that for Hazardous Materials handling.
- Establish safety audits and allow facility inspections by OFS as well as establish emergency response and evacuation procedures.
- Prioritize the safety of products, workers, and end-users.

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Supply Chain Transparency:

- Maintain transparency in the supply chain and disclose relevant information.
- Encourage Vendor's own suppliers to adopt similar principles within their own supply chains.
- Comply with supply chain laws and regulations, including obtaining required licenses.

Continuous Improvement:

- Commit to ongoing improvement in social, environmental, and ethical performance.
- Encourage innovation and the adoption of best practices.
- Ensure that Vendor has a resiliency plan and recovery procedures in place.

Environmental Responsibility:

- Comply with OFS' Environmental, Health and Safety ("EH&S") requirements, which are set forth in its website at <https://www.ofsoptics.com/our-values>.

Compliance Monitoring and Enforcement:

- Establish mechanisms to monitor and enforce compliance across its supply chains ensuring only legally allowed components and materials in products it delivers to OFS.
- Take corrective actions when violations are identified.
- Ensure no bias or discrimination against people that create, produce, or deliver Vendor's goods and services.
- Not directly or indirectly provide any material or service from a sanctioned or restricted country, person, or entity under U.S. or other applicable law.
- Not supply prohibited telecommunications equipment or services listed in the FCC's Covered List, or as further defined in other law or regulations. Vendor shall immediately notify the OFS Compliance and Governance or Global Supply Chain teams at the address listed below in writing in the event Vendor discovers any violation or potential violation of this paragraph, including, but not limited to, any prohibited telecommunications equipment or services provided to OFS or any of its affiliates.
- Ensure it has a document retention policy in place as required by applicable law or regulation.

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Community Engagement:

- Engage with local communities in a positive manner.
- Contribute to social development initiatives and respect the cultural diversity of communities.

By engaging in a business relationship with OFS and its affiliates, Vendors agree to abide by this Supplier/Vendor Code of Conduct. Failure to comply may result in termination of that business relationship.

Acknowledged and Agreed:

Vendor Name: _____

Signature/Manager

Print/Manager

Date