



## Betis Group and Supplier Code of Conduct

### ACCOUNTABILITY

- We expect our suppliers to maintain full compliance with all laws and regulations applicable to their business and, where applicable, any the Federal Acquisition Regulation, Defense Federal Acquisition Regulation Supplement, and Sarbanes Oxley controls.
- We expect our suppliers to comply with the terms and conditions of their purchase order or contract with BETIS GROUP.
- We expect our suppliers to maintain a workplace free from illegal use, possession, sale, or distribution of controlled substances.

### INTEGRITY

- Our suppliers must comply with the anti-corruption laws, directives and/or regulations that govern operations in the countries in which they do business, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act.
- We require our suppliers to refrain from offering or making any improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, even in locations where such activity may not violate local law.
- We expect our suppliers to exert due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of consultants
- Suppliers must not offer any illegal payments to, or receive any illegal payments from, any customer, supplier, their agents, representatives or others. The receipt, payment, and/or promise of monies or anything of value, directly or indirectly, intended to exert undue influence or improper advantage is prohibited. This prohibition applies even in locations where such activity may not violate local law.
- Suppliers will comply with all aspects of the Procurement Integrity Act, which generally prohibits:
  - Knowingly obtaining bid, proposal, or source-selection information related to a current or future federal procurement,
  - Disclosing bid, proposal, or source-selection information to which supplier has received access in the course of providing support or advice to a federal agency, or engaging in employment discussions with, employing, or providing compensation to certain former government procurement or contract officials.

- BETIS GROUP expects that its suppliers will respect human rights in the operation of their business. We condemn human rights abuses and we are committed to ensuring compliance with all applicable law and to combat human trafficking and the use of forced labor.

We expect our suppliers to observe similar standards respecting human rights. BETIS GROUP suppliers shall not engage in or support severe forms of trafficking in persons, procure commercial sex acts, or use forced labor in the performance of any contract. Suppliers and their employees have a duty to report human trafficking violations using any appropriate disclosure channel, including the Government's Global Human Trafficking Hotline (844) 888 FREE and its email address at [help@befree.org](mailto:help@befree.org). Suppliers working overseas shall become aware of and comply with that host nation's laws on this subject.

- Suppliers must conduct and require due diligence throughout their supply chain to prevent use of conflict minerals that may have originated in the Democratic Republic of the Congo (DRC) or an adjoining country, and directly or indirectly financed or benefitted armed groups. Conflict minerals include cassiterite, columbite tantalite, gold and

wolframite, or their derivatives (tantalum, tin, and tungsten). Where applicable, we expect suppliers to develop due diligence and reasonable country of origin inquiry processes that allow BETIS GROUP to submit accurate conflict mineral reports to the government and other entities and meet our objective that all products are responsibly manufactured.

### RESPECT

- We expect our suppliers to ensure that their employees are afforded an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct.
- We expect our suppliers to treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture.
- We expect our suppliers to provide equal employment opportunity to employees and applicants for employment, without regard to race, ethnicity, religion, color, sex, national origin, age, military veteran status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information, or mental or physical disability, so long as the essential functions of the job can be competently performed with or without reasonable accommodation.

### TRUST

- We expect suppliers to create accurate records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented.
- BETIS GROUP's and its suppliers' business relationships must be free from any perception that favorable treatment is being sought, received, or given as the result of a gift or gratuity. BETIS GROUP and supplier are subject to a range of laws that prohibit the offering and acceptance of gifts to government customers and suppliers.

### RESPONSIBILITY

- Suppliers must take due care to ensure their work product meets the quality standards required of their orders. We expect our suppliers to have in place quality assurance processes to identify defects and implement corrective actions, and to facilitate the delivery of a product whose quality meets or exceeds the contract requirements. Suppliers must maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit product(s) when warranted and exclude them from the delivered product.
- BETIS GROUP does not tolerate retaliation of any kind from a supplier against individuals who, in good faith, raise questions, report concerns, or participate in investigations of suspected unethical behavior.
- Retaliation by or against suppliers or supplier's employees for good faith reporting of misconduct or for participating in an investigation is considered a serious breach of BETIS GROUP's Code of Conduct and will result in action against the persons or suppliers engaged in the retaliatory conduct.

