



EJOT ATF Human Rights Policy and Business Conduct and Ethics Policy

Human Rights

EJOT ATF supports the principles articulated in *The Universal Declaration of Human Rights*, *The International Labor Organization's Declaration on Fundamental Principles and Rights at Work*, and *The United Nations Convention Against Corruption*. Furthermore, EJOT ATF supports the *United Nations Framework on Business and Human Rights* and the *Guiding Principles for the Implementation of the United Nations 'Protect, Respect and Ready' Framework*.

Our employees are expected to comply with such policies, and are held accountable for complying with them. We expect our affiliates to operate in a similar manner. We have incorporated such language in supplier contracts.

Specific Principles:

Labor

EJOT ATF

- Prohibits the use of forced, bonded, indentured or involuntary prison labor.
- Employs workers who are at least 16 years old.
- Sets work hours to comply with local law.
- Maintains payroll records as required under applicable federal, state, and local laws.
- Complies with applicable wage laws, regulations, including those relating to minimum wages, overtime hours, and legally mandated benefits.
- Maintains workplaces free of unlawful discrimination and harassment in all of its forms, including discrimination and harassment related to race, ethnicity, color, gender, sexual orientation, age, pregnancy, caste, disability, religious beliefs, veteran status, union membership, and any other factors protected by law.
- Ensures opportunity in employment for qualified persons with disabilities. Whenever possible, EJOT ATF will make reasonable accommodations to eligible employees in accordance with the law, and will take all other actions necessary to ensure equal opportunity for persons with disabilities in accordance with the Americans With Disabilities Act and all other applicable laws.

- Maintains workplaces free of physical and mental harassment and abuse.
- Respects employees' voluntary freedom of association, including their right to organize and bargain collectively in a manner that is legally compliant; legally recognized workers' representatives will have access to facilities necessary to carry out their required functions; EJOT ATF will not discriminate against such workers' representatives.
- Encourages open communication and direct contact between workers and management in situations where representation and collective bargaining are restricted by law.
- Respects the special and individualized needs of employees, including those who are pregnant or are returning to work after childbirth.
- Respects employees' rights to privacy and their personal information.

Health and Safety

EJOT ATF

- Strives to continuously improve health and safety performance in all operations.
- Minimizes employee exposure to potential safety hazards through proper design, engineering and administrative controls, preventive maintenance, and safe work procedures.
- Provides and properly maintains machine safeguards.
- Properly stores chemicals to ensure chemical safety and to avoid cross contamination.
- Provides personal protective equipment ("PPE") to employees.
- Will never discipline employees for raising safety concerns.
- Manages, tracks, and reports occupational injuries and illnesses.
- Maintains appropriate emergency plans and response procedures.

Conflict Minerals

EJOT ATF expects suppliers that manufacture components, parts, or products containing ores of tantalum, tin, tungsten, and gold take care to avoid the procurement or usage of materials which are unlawful or which are obtained through unethical or otherwise unacceptable means.

- Suppliers must conduct due diligence of their supply chains to determine if any of the products supplied to EJOT ATF contain Conflict Minerals.
- If suppliers determine that supplied products do not contain Conflict Minerals, suppliers must still provide EJOT ATF with an assurance that the supplied product does not, to their best knowledge, contain Conflict Minerals and describe the basis for such a determination.
- If a supplier determines that the supplied products do contain Conflict Minerals, the supplier must work with sub-suppliers to ensure traceability of Conflict Minerals to at least the smelter

level and provide the following information to EJOT ATF when requested: 1) the smelter(s) used to process the Conflict Mineral found in the product; 2) the country of origin of these Conflict Minerals; 3) the due diligence process used to make this determination; and 4) any other information EJOT ATF may reasonably request in order to comply with applicable laws.

Business Conduct and Ethics

Governance

EJOT ATF

- Properly protects business information, customer information, and intellectual property rights in accordance with applicable laws, regulations, and business requirements.
- Appropriately protects employee and supplier “whistleblower” confidentiality and prohibits retaliation for reporting violations.
- Prohibits corruption, extortion and embezzlement, bribery, money laundering, or other means of obtaining undue or improper advantage.
- Obtains business only on the merits of its products, services, and employees.
- Never pays, offers or promises to provide money, favors, inappropriate gifts, hospitality, or entertainment or anything else of value for an improper or corrupt purpose, or otherwise appears to influence business judgment or the decision-making of customers or suppliers which can be considered bribery.

Code of Business Conduct

EJOT ATF is committed to complying with all laws and regulations wherever it conducts business. EJOT ATF employees, as representatives of EJOT ATF, conduct themselves in the following manner:

- EJOT ATF employees will compete honestly and fairly for all business.
- EJOT ATF employees will strictly observe the laws, rules, and regulations that are applicable to the conduct of EJOT ATF’s business.
- EJOT ATF employees will avoid situations where their personal interests conflict, or appear to conflict, with the interests of EJOT ATF including any situation of accepting or offering bribes.
- EJOT ATF employees will behave in a manner that insures a work environment free from all forms of illegal discrimination and will be committed to complying with all applicable laws and regulations related to the environment, safety, and health.
- EJOT ATF employees will treat one another with respect and not take part in any kind of fighting, horseplay, or use of obscene, profane, or abusive language when interacting with one another.

- EJOT ATF employees will report any misconduct of which they are aware, without fear of reprisal, and cooperate with any ensuing investigation of a matter reported to EJOT ATF management.
- EJOT ATF employees have the option of reporting concerns directly to a confidential third party, Employment Practice Solutions (EPS), by calling 800-837-6855.

Reporting and Accountability

Throughout its operations, EJOT ATF strives to achieve these principles. As such, supervisors are responsible for helping their team members comply with this policy. Employees are expected to comply with this policy, and submit questions or concerns to supervisory staff or to members of Human Resources, Legal, or other departments where appropriate.

Employees are also encouraged to raise any issues and concerns with their supervisor, Human Resources department, or a member of the Legal Department.