

# **DMT Solutions Global Corporation d/b/a Supplier Code of Conduct**

(October 2020)

## Introduction:

BlueCrest is committed to the highest standards of product quality and business integrity in its dealings with Suppliers and ensuring that working conditions in our supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally and socially responsible.

To ensure our relationships with Suppliers meet and support these expectations, BlueCrest has developed a Supplier Code of Conduct. Accordingly, we require each of our Suppliers to acknowledge and support our Code and seek to conform to its standards and provisions documented in detail below.

Furthermore, we expect our suppliers to apply these to their extended sources of supply engaged in the production of goods and services for BlueCrest. Failure on the supplier's part to comply with the standards and provisions set forth in our Code may impact business relationships with BlueCrest.

**Dennis LeStrange**

President and CEO

DMT Solutions Global Corporation (d/b/a BlueCrest)

## **Supplier Code of Conduct**

### **DMT Solutions Global Corporation (d/b/a BlueCrest)**

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## **BlueCrest Supplier Code of Conduct**

*BlueCrest has always set high standards for conducting business in a socially and environmentally responsible manner, with sound business ethics, and in compliance with all applicable laws and regulations. In turn, we expect the same commitment from our suppliers.*

*This is why we have established the DMT Solutions Global Corporation d/b/a BlueCrest (herein referred to as “BlueCrest”) Supplier Code of Conduct. These principles speak to the commitments we make to our customers, our commitment to compliance with law, and our legacy of innovation and relationships built on trust and personal responsibility. We will consider these principles in our selection of suppliers and will actively monitor their compliance. In turn, it is expected that our Suppliers will apply these standards to the suppliers they work with in the delivery of goods and services for BLUECREST.*

### **Forced Labor**

BLUECREST Suppliers will not use forced or involuntary labor of any type (e.g., forced, bonded, indentured or involuntary prison labor). BLUECREST Suppliers will not use child labor. The term “child” refers to any person employed under the minimum age for employment in the country where work is performed. We support the use of legitimate workplace apprenticeship programs which comply with all applicable laws and regulations.

### **Wages and Working Hours**

BLUECREST Suppliers will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits. Workers should not be required to work more than 60 hours per week, including overtime, except in extraordinary business circumstances with their consent. Employees should be allowed at least one day off during a seven-day week.

### **Nondiscrimination**

BLUECREST Suppliers will not discriminate in hiring and employment practices on grounds of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation, or disability, subject to local law.

### **Respect and Dignity**

BLUECREST Suppliers will treat all employees with respect and will not use corporal punishment, threats of violence or other forms of physical coercion or harassment. Supplier should have a policy that prohibits inappropriate conduct and a process for employees to report such conduct for Supplier’s investigation and resolution.

### **Non-Compliance Reporting**

**Violations of this Code of Conduct should be reported to 1-800-461-9330 or to BLUECREST’s confidential Ethics and Compliance Portal.**

### **Health and Safety**

BLUECREST Suppliers will provide their employees with a safe and healthy workplace in compliance with all applicable laws, regulations and sound industry practice. Consistent with these obligations, BLUECREST Suppliers must have and implement effective programs that encompass life safety, incident investigation, chemical safety, ergonomics, and other relevant protective elements.

### **Protection of the Environment**

BLUECREST Suppliers will operate in a manner that is protective of the environment. At a minimum, Suppliers must comply with all applicable environmental laws, regulations and sound industry practice, such as requirements regarding chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits and environmental reporting. Suppliers must also comply with any additional environmental requirements as called for in BlueCrest’ design and product specifications, and contract documents.

### **Legal and Ethical Dealings**

BLUECREST Suppliers will comply with all applicable laws and regulations in all locations where they conduct business, especially with respect to strict compliance with all laws and regulations on bribery, corruption and prohibited business practices. BLUECREST expects suppliers to conduct their business in accordance with the highest ethical standards.

### **Product Compliance**

BLUECREST Suppliers will manufacture our parts and products in a manner such that adverse or potentially adverse impacts on people, communities, and the environment will be minimized and eliminated. This includes meeting Environmental Compliance regulatory requirements such as REACH, RoHS and WEEE, investigating the origins of “3TG metals” covered under the Dodd-Frank Act, and providing requested environmental product data.

## BlueCrest Supplier Code of Conduct

### Code 1 **Forced Labor**

BLUECREST Suppliers will not use forced or involuntary labor of any type (e.g., forced, bonded, indentured or involuntary prison labor). BLUECREST Suppliers will not use child labor. The term “child” refers to any person employed under the minimum age for employment in the country where work is performed. We support the use of legitimate workplace apprenticeship programs which comply with all applicable laws and regulations.

#### **Critical Benchmarks**

BLUECREST Supplier Code of Conduct bans forced or illegal child labor in any form by suppliers. All employment must be voluntary and legal. Suppliers must comply with all applicable child labor laws, including those relating to minimum age limits, limitations of hours worked, and prohibitions against certain types of work.

#### ***Forced or prison labor***

Forced or prison laborers are prohibited from employment if they are constrained to work as a requirement of the sentence and without compensation. Forced or prison labor occurs most often where the supplier is using a government or military-controlled agency to provide or arrange for the hiring of workers.

#### ***Indentured and bonded labor***

Indentured labor refers to employees who are forced, physically or by intimidation, to perform work against the employee’s will. Bonded labor refers to situations where employees work to pay a debt, which may have been created by another person.

#### ***Child labor***

Many countries restrict the number of hours persons between ages 13 and 18 can work. Young workers may also be barred from performing certain types of work, such as hazardous work, night work or overtime work

Apprentice programs are regulated by law in most countries, with specific limits on number of hours worked, duration of training period, number of times the same worker can be classified as a trainee, and requirements for post-apprenticeship hiring

#### **Examples of Actual or Potential Noncompliance**

Any type of forced, prison, indentured, or bonded labor  
Unreasonable restrictions placed on basic liberties – (bathroom, drinking water, use of medical facilities, etc.)  
Withholding government issued identification, passports or work permits without employee consent  
Use of workers below the legal age of employment  
Incomplete or missing age documentation records verifying the age of all employees when workers appear to be of unlawful age within the facility

#### **Examples of Good Management Practices**

Supplier’s hiring practices, and those of any labor recruiters, prohibit forced or bonded labor. Supplier actively verifies compliance  
Supplier establishes a written set of instructions for all subcontractors and labor recruiters that prohibit forced labor and supplier requires certification of compliance  
Government-issued identification, passports or work permits are not withheld from the employee.  
Supplier verifies the age of each worker prior to employment  
Supplier ensures that young workers are only employed within the legally specified number of hours  
Supplier has a clear program for hiring, training, and promoting apprentices

## BlueCrest Supplier Code of Conduct

### **Code 2      Wages and Working Hours**

BLUECREST Suppliers will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits. Workers should not be required to work more than 60 hours per week, including overtime, except in extraordinary business circumstances with their consent. Employees should be allowed at least one day off during a seven-day week.

#### **Critical Benchmarks**

All employees are paid the legal minimum wage applicable in the country of operation  
 Workers must be compensated for overtime hours at the legally mandated premium rates, or where such rates do not exist, payment for overtime hours must be at least equal to the regular hourly wage  
 Employees should receive all statutory benefits mandated by law, including but not limited to pension benefits, annual leave, and holidays. (**Note:** Unless specified otherwise by local legal requirements, this provision may not apply to exempt employees, including those in executive, managerial, or professional positions)  
 Establish a weekly work schedule compliant with local legal limits on regular working hours  
 Provide workers with advance notice that overtime hours may be necessary. (**Note:** Unless specified otherwise by local legal requirements, this provision may not apply to exempt employees, including those in executive, managerial, or professional positions)

#### **Examples of Actual or Potential Noncompliance**

Lack of compliance with minimum wage and overtime guidelines  
 Incorrect pay records  
 Miscalculation of wages  
 Miscalculation of benefits

#### **Examples of Actual or Potential Noncompliance (continued)**

Improper or unauthorized wage deductions  
 Compensation not paid directly to workers, except as required by law or by voluntary employee authorization  
 Nonpayment or late payment of wages.  
 Failure to provide employer/employee mandated benefits  
 Failure to pay mandated compensation withholdings to the appropriate government agency  
 No payroll receipts provided to workers  
 Missing, incorrect, or no time records.  
 Non-payment for actual time worked (work done off the clock)  
 Not providing mandated rest day(s), holiday(s), and vacations day(s)  
 Denial of mandated meal and rest breaks

#### **Examples of Good Management Practices**

Employees are provided payroll receipts that clearly indicate compensation, including overtime hours and overtime compensation levels  
 Workers are educated on wage/pay practices  
 Workers are encouraged through surveys to suggest changes/improvements in benefits  
 Supplier maintains and applies systems to pay workers for overtime in accordance with applicable law  
 Supplier has a process for identifying capacity restraints, to minimize overtime hours

### **Code 3 Nondiscrimination**

*BLUECREST Suppliers will not discriminate in hiring and employment practices on grounds of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation, or disability, subject to local law.*

#### **Critical Benchmarks**

BLUECREST Supplier Code of Conduct stipulates that job candidates and/or employees be judged solely based on their ability to perform the job they are applying for or currently engaged in. This provision applies to all employment decisions, including recruitment, hiring, training, promotion, and termination.

#### **Examples of Actual or Potential Noncompliance**

- Discrimination in hiring, employing, or terminating workers
- Substantial differences in the demographics of Supplier’s workforce compared to other similar facilities in the local vicinity may indicate discriminatory practices
- Variations in pay, benefits or promotion based on grounds of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, political affiliation, or disability
- Health tests, pregnancy testing, or contraception used as a condition of employment
- Pregnant workers performing dangerous tasks.
- Withholding mandated benefits such as maternity leave
- Lack of written hiring and employment policies.
- Lack of feedback system between employees and management

#### **Examples of Good Management Practices**

- Periodically reviewing hiring practices to determine that there is no prohibited discrimination
- Hiring agents and Supplier management who are trained in nondiscrimination and applicable nondiscrimination laws
- Periodically training managers on nondiscrimination
- Conducting interviews to determine that employees are being fairly compensated, including whether women workers are allowed to take maternity leave
- Creating written job descriptions that focus solely on “occupational qualifications”, not personal characteristics
- Taking proactive action to hire and promote a diverse workforce
- Management communicates its written policies on nondiscrimination to its employees

**Code 4      Respect and Dignity**

*BLUECREST Suppliers will treat all employees with respect and will not use corporal punishment, threats of violence or other forms of physical coercion or harassment. Supplier should have a policy that prohibits inappropriate conduct and a process for employees to report such conduct for Supplier’s investigation and resolution.*

**Critical Benchmarks**

BLUECREST Suppliers must not:  
 Engage in harassing or physically abusive discipline  
 Act in a threatening way towards employees  
 Submit employees to demeaning conditions

***Examples of prohibited abuse***

Threats to harm an employee’s physical well-being  
 Physical contact intended to harass, hurt, or harm, whether or not considered to be disciplinary action  
 Comments which are understood by the employee to be harassing or demeaning  
 Harassment based on race, religion, age, nationality, social or ethnic origin, sexual orientation, gender identity or expression, political affiliation, or disability  
 Sexual harassment of any kind  
 Discipline resulting in the withdrawal of basic physical comforts provided other workers

**Examples of Actual or Potential Noncompliance**

Evidence of physical or sexual abuse or harassment  
 Evidence of wage deductions or monetary fines used as discipline  
 Lack of written policies prohibiting physical or sexual abuse or harassment  
 Lack of feedback system between employees and management

**Examples of Good Management Practices**

Written policies and practices are in place prohibiting harassment and abuse  
 Supplier has established a training program for management and supervisors delineating policies and disciplinary actions are clearly documented  
 All disciplinary actions are non-physical and clearly documented  
 The supplier has established a communication system or suggestion box where workers can raise issues of concern including treatment by their supervisors or coworkers  
 Supplier has a program providing for investigation of worker concerns about illegal or unethical conduct, and resolves substantiated concerns with appropriate discipline according to its policies and practices  
 Management communicates its written policies on respect and dignity to its employees

## **Code 5 Health and Safety**

*Suppliers will provide their employees with a safe and healthy workplace in compliance with all applicable laws, regulations and sound industry practice. Consistent with these obligations, BLUECREST Suppliers must have and implement effective programs that encompass life safety, incident investigation, chemical safety, ergonomics, and other relevant protective elements.*

### **Critical Benchmarks**

BLUECREST Suppliers are required to:  
Comply with all applicable laws regarding health and safety in the workplace  
Comply with all legal regulations regarding health and safety in residential facilities, where provided  
Provide employees with a safe and healthy work environment, with appropriate health and safety training provided to employees  
Effectively implement any program necessary to identify and mitigate workplace hazards

### **Examples of Actual or Potential Noncompliance**

Blocked, locked, or no emergency exits  
Immediate fire hazards – (e.g. frayed electrical wiring, open flames, flammable vapors, etc.)  
Inadequate fire extinguishers or fire fighting equipment  
Blocked aisles and passageways  
No evacuation plan, signage or drills  
Missing exit signs; Insufficient or no emergency lighting  
No fire alarm system or public address system  
No drinkable water  
Inadequate or missing machine guards  
Lack of personal protective equipment or improper use  
Unsafe worker exposure to hazardous chemicals or substances  
Hazardous chemicals or substances that are without proper labels and datasheets  
Missing handrails/guardrails on stairwells, elevated walkways or platforms  
Lack of fall protection above 6 feet when required  
Poor or inadequate ventilation, lighting, and temperature controls  
Missing or inadequate first aid supplies or other provisions for emergency care  
Unsanitary or insufficient toilets, hand washing or canteen areas

### **Examples of Actual or Potential Noncompliance (continued)**

Routine building and machine maintenance not performed  
Repetitive lifting or unusually heavy objects or work requiring extremely awkward postures  
Unstable or makeshift scaffolding  
Trash and rubbish accumulation or other signs of grossly inadequate housekeeping  
Electrical hazards (e.g., bare wires, exposed electrical panels, ungrounded equipment, overloaded circuits)  
Uncontrolled confined spaces (e.g., tanks, pits, vaults, manholes) where there could be potentially hazardous atmospheres, insufficient oxygen levels, etc.

### **Examples of Good Management Practices**

A management system has been implemented to identify and control potential hazards and to strive for continuous improvement (e.g., OSHA S 18001)  
A health and safety manager has been appointed to oversee compliance  
Employees are involved in safety programs and management leadership is evident.  
Health and safety education is provided during initial orientation and on an ongoing basis  
Workplace incidents are reported and investigated and action taken to minimize the potential for future occurrence  
Formal and informal management self-assessments are completed on a routine basis.  
Health and safety trends (e.g., incidents, employee perceptions, regulatory deficiencies) are monitored and properly addressed  
New equipment, processes and facilities are reviewed for potential health and safety risks prior to initiation  
Emergency evacuation drills are conducted regularly.  
Emergency response capabilities are appropriate to the risk  
Health and safety professionals are consulted for guidance and evaluation



## **Code 6 Protection of the Environment**

*BLUECREST Suppliers will operate in a manner that is protective of the environment. At a minimum, suppliers must comply with all applicable environmental laws, regulations and sound industry practices, such as requirements regarding chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits and environmental reporting. Suppliers must also comply with any additional environmental requirements called for in BlueCrest's design and product specifications, and contract documents.*

### **Critical Benchmarks**

BLUECREST Supplier Code of Conduct calls for suppliers to conduct their operations in ways that are environmentally responsible and in compliance with all applicable environmental laws, regulations, and standards. Suppliers are also required to meet any additional requirements specific to their work with BLUECREST. The applicability of compliance will vary depending on the product or service being provided to BLUECREST and the associated operations.

### **Examples of Actual or Potential Noncompliance**

Supplier does not have a process to identify applicable laws, regulations, and standards  
 Supplier does not have appropriate records documenting compliance to the law, such as required environmental monitoring, reporting, permits, etc.  
 Supplier cannot demonstrate that it is meeting BLUECREST's environmental requirements in design and product specifications or contract documents  
 Employees are not adequately trained on proper handling, use and storage of hazardous waste and on emergency procedures  
 Supplier's chemical and waste management/pollution control systems and processes are not in compliance with applicable environmental laws, regulations, standards and sound industry practices. Examples:  
 unlawful disposal of chemicals or waste  
 uncontrolled air emissions  
 discharging untreated wastewater  
 chemicals are not being properly used, managed, stored and disposed of  
 hazardous and combustible materials and waste are not clearly marked and/or properly stored  
 use of banned substances  
 Improper use of pesticides or herbicides

### **Examples of Actual or Potential Noncompliance**

Supplier has received environmental violations. (If the violations are minor and have been appropriately addressed, they would not represent an issue.)

### **Examples of Good Management Practices**

Supplier has a complete and effective environmental management system (written policies, processes, and requirements for environmental protection and pollution prevention/source reduction) that is in accordance with laws, regulations, and standards  
 Supplier conducts periodic environmental audits to confirm that its operations are environmentally responsible and are conducted in accordance with laws, regulations, and standards  
 Supplier's staff and contractors have the necessary skills and training so they are familiar with the supplier's environmental management system and their role in meeting environmental requirements  
 Supplier is proactive with respect to environmental protection and employees are encouraged and comfortable with raising issues of environmental concern without fear of retaliation  
 Supplier has obtained certification to the ISO 14001 environmental management system standard or equivalent  
 Supplier has programs for the efficient use and conservation of energy  
 Supplier has programs for the efficient use and conservation of water  
 Supplier has programs for the efficient use of materials, including waste reduction, material reuse, and recycling  
 Supplier has programs to review environmental performance of its supply chain, and acts meaningfully to improve performance throughout

## Code 7 Legal and Ethical Dealings

*BLUECREST Suppliers will comply with all applicable laws and regulations in all locations where they conduct business, especially with respect to strict compliance with all laws and regulations on bribery, corruption and prohibited business practices. BLUECREST expects suppliers to conduct their business in accordance with the highest ethical standards.*

### Critical Benchmarks

BLUECREST Supplier Code of Conduct requires that

Suppliers:

Know and comply with all applicable legal requirements, including U. S. import, export and trade laws and similar laws of the countries in which Supplier operates

Review internal processes and procedures for legal compliance and ethics issues

Not offer or provide cash or non-cash gifts to any BLUECREST employee, or to anyone else on BLUECREST's behalf, to influence them to take or not take a course action or for any other improper purpose

Avoid any conflict of interest between Supplier and BLUECREST and make timely disclosure of all such actual or potential conflicts to BLUECREST.

Comply fully with all anti-bribery laws, including the U.S. Foreign Corrupt Practices Act

Maintain adequate physical and electronic security for all confidential information relating to BLUECREST

Only use subcontractors that do not violate ethical standards through bribes, kickbacks or other similar improper or unlawful activity

Must not represent themselves to be agents or representatives of BLUECREST without BLUECREST's prior written consent

### Examples of Actual or Potential Noncompliance

No postings of legally required wage, benefit, and health information

Maintaining inadequate, out-of-date, or **missing process and procedure** documentation

Ineffective monitoring of internal compliance performance

Failure to review and act upon complaints about noncompliance from employees or others

### Examples of Good Management Practices

Supplier senior management supports compliance objectives and practices and enforces them

Supplier has management representatives who are responsible for monitoring the Suppliers' compliance.

Supplier cooperates with monitoring government officials responsible for reviewing compliance practices

Encourage all employees to report suspected noncompliance to management

Supplier discloses all potential and actual conflicts of interest to BLUECREST (e.g., if a Supplier employee has a relationship with a BLUECREST employee who can make decisions affecting Supplier's business)

Supplier follows written policies and guidelines on conflicts of interest, giving and receiving of gifts, business trips, entertainment, use of representatives and agents, and facilitation payments that are in accordance with law

Supplier has generally acceptable accounting policies, procedures, and record keeping.

Supplier conducts periodic financial audits to confirm that its accounts are in order

Supplier staff and contractors are educated so they are aware of their ethical and legal requirements and Supplier's standards

Create clear communications channels so that employees are comfortable with reporting, and are encouraged to report, violations of law or Supplier policy. Have and follow policies that prohibit retaliation for employee reporting

## BlueCrest Supplier Code of Conduct

### Code 8 Product Compliance

*BLUECREST Suppliers will manufacture our parts and products in a manner such that adverse or potentially adverse impacts on people, communities, and the environment will be minimized and eliminated. This includes meeting Environmental Compliance regulatory requirements such as REACH, RoHS and WEEE, investigating the origins of “3TG metals” covered under the Dodd-Frank Act, and providing requested environmental product data.*

#### Critical Benchmarks

BLUECREST Supplier Code of Conduct requires that suppliers:

Understand and comply with all applicable federal, state, local and international environmental laws, requirements and regulations, including but not limited to the Directive 2011/65/ EC of the European Parliament the restriction of the use of certain hazardous substances in electrical and electronic equipment (ROHS2); (ii) the Directive 2002/96/EC of the European Parliament Waste Electrical and Electronic Equipment (WEEE) (iii) the Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH); and (iv) BLUECREST environmental specifications and standards (packaging, labeling, etc.) and fully cooperate with BlueCrest' efforts to comply with those requirements.

Upon request, Supplier will certify that the products it supplies to BLUECREST are manufactured in accordance with applicable laws, regulations and requirements. This includes surveys, data requests, etc.

Shall be responsible for all registration and other REACH requirements for chemical products by either importing the product into the EU and supplying the product to BlueCrest as a downstream user or appointing an Only Representative to fulfill all REACH obligations.

Warrant that any materials returned by BLUECREST will be disposed of, recycled, recovered, or reclaimed and not landfilled, in accordance with all applicable international, federal, state, local and European Union environmental laws and regulations of the country of material dispositioning.

#### Examples of Actual or Potential Noncompliance

Not responding to Product Compliance Database information requests.  
Not providing a Certificate of Compliance for RoHS.  
Not undertaking an investigation into the origins of covered minerals.  
Not responding to Compliance Database information requests / surveys.  
Providing false information to BlueCrest regarding the composition of products supplied to BLUECREST or Supplier's compliance with applicable laws, regulations or contractual requirements.  
Not allowing BLUECREST to audit a facility or review requested files associated with BLUECREST business.

#### Examples of Good Management Practices

Agree upon notice from BLUECREST, at reasonable intervals, to permit representatives of BLUECREST to visit and audit, at BLUECREST's expense, the environmental, health and safety records, programs, data and procedures.  
Provide products and services that meet regulatory requirements and are safe to use.  
Supplier strives to reduce or eliminate waste of all types at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, and recycling and reusing materials.  
Supplier responds to regulatory information requests in a timely manner.  
Supplier completes investigation of products, materials provided to BLUECREST that may contain 3TG metals and determines whether those substances originate in areas of conflict.  
Supplier responds to BlueCrest Conflict Minerals survey and attests to the origin of any 3TG metals contained in Supplier's products.  
Supplier identifies and manages chemicals and other materials posing a hazard if released to the environment to ensure their safe handling, movement, storage, use, recycling and reuse, and disposal