

# Code of Ethics and Conduct

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**8/25/17**

Document No. F-730-001 Rev A.

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**4/19/2021**

Document No. F-730-001 Rev B.

This document provides the standard by which Winchester Interconnect Micro formerly known as Ulti-Mate Connector, LLC. and its employees will conduct themselves ethically in activities both internal and external as they relate to business operations.

## **Our Values**

### People

- Treat others with respect and dignity.
- Be sympathetic and understanding.
- Welcome diversity: people and their opinions.
- Recognize and reward accomplishment.
- Collaborate with fellow employees to improve the skill sets of all.

### Integrity

- Tell the truth.
- Be forthright with no hidden agendas.
- Obey and respect the law, government regulation, and company policy.
- Honor commitments to each other, customers, and suppliers.
- Be accountable.

### Excellence

- Improve performance continually.
- Continuous innovation in all that we do.
- Achieve the highest levels of quality and efficiency.
- Perform work in accordance with best practices.
- Strive to be the best.

## **The Code of Conduct**

Winchester Interconnect Micro's Values of People, Integrity, and Excellence are the foundation for our Code of Ethics and Conduct. The Code provides guidance about business behavior expected of the Winchester Interconnect Micro community as we work and interact with customers, coworkers, and suppliers. The Code applies to company ownership, officers, employees, and in certain respects to suppliers, consultants, and representatives.

Employees are encouraged to contact their supervisor or the Ethics Office to: resolve concerns, report potential ethics violations, or to obtain advice concerning ethics-related issues.

## **Code of Conduct Responsibilities**

### Responsibilities of Employees:

- Foster a culture of ethical behavior.
- Understand and adhere to the standards of behavior outlined in the Code and related company policy, guidelines, and rules.
- Seek advice from the appropriate company resources to obtain answers to questions concerning a course of action.
- Report instances of observed or suspected misconduct.
- Cooperate with any investigations of alleged misconduct or violation of policy, procedure, rule, regulation, or law.

### Responsibilities of Leaders:

- Serve as an ethical role model by treating people appropriately, acting with integrity, and performing with excellence.
- Promote a culture of compliance to the code, policies, procedures, regulations, and laws.
- Foster an open environment that permits employees to be comfortable when raising questions or concerns without fear of retaliation.
- Communicate and demonstrate intolerance for unethical behavior.
- Enlist available resources and the Ethics Office to assist in resolving issues.
- Earn trust by leading according to Winchester Interconnect Micros values.
- Ensure that employees are aware and compliant of company ethics.

## **Code of Conduct – No Retaliation**

It is strictly prohibited that adverse actions be taken against anyone who reports conduct that he or she reasonably believes is illegal or otherwise violates the Code. Even if the report is ultimately mistaken, the employee who reported the potential violation shall not be discharged, demoted, suspended, threatened, harassed, or treated in any adverse manner because of such a report, including reports made to government agencies. Potential retaliatory acts will be thoroughly investigated, and appropriate action taken. An employee found to have retaliated against a reporting individual will face disciplinary action and potential termination of employment.

## **Comply with Laws and Regulations**

All owners, officers, employees, and business partners such as suppliers, consultants, and representatives must obey applicable laws and regulations. This includes FAR's (Federal Acquisition Regulations). As a government contractor, the laws and regulations affecting Winchester Interconnect Micro are complex. Therefore, it is important to seek advice and guidance through the Ethics Office to ensure compliance.

## **Treat People in an Ethical Manner**

We are committed to a nurturing and rewarding environment for our employees that will help them to achieve the rewards of personal and professional growth. We are committed to honesty, fairness, just management, and a safe and healthy environment. We shall comply with all applicable, work-place laws and regulations to ensure that employee health is protected. We maintain a drug-free, secure workplace where employees are attentive to hazard prevention. Each employee is responsible to follow safety and health rules, to observe posted warnings, and to report any accidents, injuries, and unsafe equipment, practices, or conditions to appropriate leadership.

All employees are expected to treat fellow employees, customers, and business partners with respect and dignity. Each employee shall be honorable, trustworthy, and responsible. We value an inclusive workforce in order to promote diversity of thinking, the type that helps us reach solutions so we may achieve excellence. We are committed to fair employment practices that are made regardless of race, color, creed, religion, ethnicity, national origin, sex, sexual orientation, gender identity and expression, age disability, or veteran status. We will not tolerate harassment or discrimination of any kind.

Our customers will be treated with the utmost respect so that we may have long-standing relationships; the customer is king. We will do this by maintaining delivery schedules, selling our products at a fair price, and assuring the quality of each product.

Our suppliers and partners are inextricably linked to our success. Therefore, we are committed to fair competition and being a good customer that treats its vendors and partners as extensions of the Winchester Interconnect Micro community.

With respect for the communities in which we live and work, we are committed to observe sound environment business practices and act as concerned, responsible neighbors so as to reflect all aspects of good citizenship. As part of this commitment, we will strive to do no environmental harm, and each employee is responsible for observing sensible environmental practices.

## **Maintain Financial Integrity**

The company's financial records including books, cost accounts, and financial statements shall properly document all assets and liability, accurately reflect all transactions, and be maintained in accordance with company policy, Generally Accepted Accounting Principles (GAAP), and applicable laws and regulations. Company funds may not be used for any unethical purpose. No false entries shall ever be made on our books or company records. Undisclosed or unrecorded funds or assets may not be established. All company books, records, accounts, and financial statements must be maintained in reasonable detail, must appropriately reflect the company's transactions, and must conform to applicable legal requirements and to our system of internal controls. Any and all concerns about financial reporting should be raised with supervisors, the

financial department, ownership, or the Ethics Office. Those who become aware of employee questions or concerns must make sure that these issues are properly elevated within the company to ensure an appropriate response.

### **Accurately Record Labor and Other Costs**

Accurately charging labor, material, and other costs is essential to maintaining the integrity of customer billings, financial reporting, and planning. Deliberate mischarging of work time or timecard fraud violates company policy and the law. Knowingly charging an unauthorized account or cost objective, knowingly approving such mischarges, or shifting costs to improper accounts is strictly prohibited. Each employee is responsible for ensuring that labor, travel, material, and other expenses are recorded truthfully. Supervisors, the finance department, and the Ethics Office must be contacted if an employee has questions or concerns about the charging of labor and other costs.

### **Steer Clear of Accepting or Giving Improper Gifts**

Winchester Interconnect Micro does not sell nor buy goods and services that have even the perception of favorable treatment resulting from having been sought, received, or given in exchange for furnishing or receiving business courtesies. Employees will not give or accept business courtesies that could reasonably be perceived as influencing the company's business transactions. Promotional items with little intrinsic value totaling \$10 or less may be given to customers and/or received from vendors. It is acceptable that meals, refreshment, and entertainment will be provided and accepted by Winchester Interconnect Micro employees to further relationships with customers and vendors. Such meals, refreshments, and entertainment should never violate the standards of the customer or vendor's organization and should be consistent with marketplace practices, infrequent in nature, and may never be lavish or extravagant (rule of thumb is \$25 or less per person). Giving or receiving gifts with a market value of \$100 or more is expressly prohibited without the express, written consent of the Ethics Office.

Before any business courtesy is exchanged with a government employee, a Winchester Interconnect Micro employee has the responsibility to seek guidance from the Ethics Office. Laws governing such interactions are complex and fluid. Therefore, it is important that the laws and regulations are thoroughly reviewed before any such exchange is made.

### **Avoid and Steer Clear of Conflicts of Interest, Disclose Potential Conflicts**

Nepotism or other conflicts of interest – even if in appearance – are to be avoided. Any relationship, influence, or activity that might impair - or even appear to impair - an employee's ability to make fair, objective decisions when performing their job duties must be disclosed to the Ethics Office for review and resolution. Examples of such conflicts include: dual or prior employment by a customer, competitor, or supplier; placement of business where the employee or family member has an interest; acting independently as a consultant to a customer or

supplier of Winchester Interconnect Micro; or accepting anything of value in excess of \$10 or not expressly approved by the Ethics Office from a supplier or potential supplier.

All employees are prohibited from taking opportunities for themselves discovered through the use of company information, position, or property without the consent of company ownership. No company information, position, or property may be used for improper personal gain, and no employee may compete with the company directly or indirectly. Any potential conflict of interest must be disclosed to the Ethics Office immediately.

### **Engage only in Lawful and Authorized Political Activity**

Winchester Interconnect Micro encourages its employees to be civically minded and involved in the political process. However, such participation must be on the employee's own time and at the employee's own expense. It is expressly prohibited for employees to engage in political activities on the company's time or using any of the company's assets.

### **Ensure the Quality of Our Products**

The success of Winchester Interconnect Micro and its customers depends on providing quality products. This means having a culture that will meet all contract and government requirements where employees take personal responsibility to comply with quality standards, perform in accordance with best practices, and never seek to hide or cover-up a mistake. Every inspection and test specified on a drawing or in a contract must be performed and properly documented.

If a change to a contract or drawing requirement is considered, the customer must be notified and given approval for the change. Employees must follow approved company processes to guard against product substitution or the use of counterfeit parts.

### **Protect Proprietary Information**

Winchester Interconnect Micro's proprietary information must be safeguarded. This information includes our ideas, drawings, financial information, customer solutions, business plans, and other information intended to not be disclosed. This information may never be disclosed without proper authorization. Keep proprietary information protected and secure. Any proprietary information provided by suppliers, customers, or competitors must be protected and respected.

### **Appropriately Use Company Assets**

Winchester Interconnect Micro provides employees with business tools such as computers, internet access, telephones, and a wide variety of other equipment. Use and maintain these assets with the utmost care and respect. Do not abuse or waste. Do not remove from company property without permission. When the personal use of these tools is permissible, the employee shall not use this company property in such a way that interferes with job performance, compromises Winchester Interconnect Micro's interests, or negatively reflects on the company.

## **Combating Human Trafficking**

Federal law obligates United States Government contractors to meet certain requirements designed to protect persons from exploitation and to eliminate human trafficking, including sex trafficking, forced labor, and other forms of involuntary servitude. The United States Government has adopted a zero-tolerance policy regarding trafficking in human persons. The United States Government prohibits contractors and contractor employees from engaging in any of the following activities while performing on a United States Government contract:

- Procuring commercial sex acts (including, for example, prostitution)
- Participating in any sex trafficking involving children under the age of 18
- Inducing a commercial sex act by force, fraud, or coercion
- Using forced labor
- Recruiting, harboring, transporting, providing, or obtaining a person for involuntary servitude, slavery, or debt bondage

Any Employee or subcontractor employee found to have violated this policy will be subject to discipline, including (without limitation): (1) removal from the United States Government contract; (2) reduction in benefits; (3) termination of employment; and (4) referral to the appropriate criminal authorities. The Company will promptly notify the appropriate United States Government authorities of any violation of this policy. If you become aware of any violation of this section, you should alert the Legal Team immediately.