



## **CODE OF ETHICS AND BUSINESS CONDUCT**

### **Our Core Values**

- **Integrity**  
We conduct ourselves with integrity at all times.
- **Respect**  
We show respect to everyone in all of our interactions.
- **Excellence**  
We always strive to achieve excellence in Quality and Delivery.

### **Laws and Regulations and Contracts**

We follow all laws and regulations pertaining to our business and follow the flowdown terms of our customers.

### **Anti-corruption. Gifts/Business Courtesies**

We comply with the anti-corruption laws that govern where we do business. We do not offer or receive any bribes or kickbacks. Small gratuities of nominal value received, are immediately turned into Human Resources to be distributed at a later date by drawing among all employees.

### **Conflicts of Interest**

We avoid situations that have the potential or appearance of conflicts between personal interest and our customers.

### **Confidential/Proprietary**

We handle, store and protect all confidential and sensitive information with extreme care. Information is only disclosed to those who have a "need to know" and authorizations and/or Proprietary Agreements are obtained as required. All paper documents no longer needed are shredded then recycled by an AAA NAID Certified facility.

### **Financial Responsibility/Accurate Records**

We accurately record, maintain and report our business records, including, but not limited to, financial statements, quality records, and time records. We properly account for all costs and do not falsify or misrepresent the facts and figures. Records are regularly reviewed to ensure accuracy.

## **ETI TECH and Starwin Industries**

### **CODE OF ETHICS AND BUSINESS CONDUCT (CONT.)**

#### **Environment**

We constantly look for ways to reduce waste, improve the environment and share suggestions with customers and suppliers too. All paper documents no longer needed are shredded then recycled by an AAA NAID Certified facility. We also maintain a recycling program and use energy efficient lighting throughout our plant.

#### **Human Rights and the Workplace**

We are an equal opportunity employer with a safe work environment. We offer wellness programs and provide safety training, such as CPR/AED training to all of our employees and have a reporting procedure in place to immediately address any accidents. We are committed to maintaining a workplace that is free of drugs, alcohol and tobacco. We absolutely prohibit any harassment, bullying, discrimination, and use of child or forced labor.

#### **Conflict Minerals and Counterfeit Parts**

We take measures to assure that no conflict minerals are purchased from sources that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or adjoining countries and require our supply chain to do the same. We have procedures in place to minimize the risk of introducing counterfeit parts and materials into deliverable products.

#### **Training Requirements**

In order to ensure that ALL ETI TECH and STARWIN INDUSTRIES employees are held to an ethical standard, all employee will be required to take and be certified in ETI and Starwin's code of Ethics and Code of Business conduct , within 30 days of start of employment, and yearly thereafter.

