

# Code of Conduct

## MISSION

We provide full support and deliver innovative solutions to help our customers produce the best products available.

## VISION

Be a leader in electronics contract manufacturing.

## **VALUES**

- Loyalty
- Integrity
- Exceeding expectations



## President's Note

It is my pleasure to share with you our updated **Code of Conduct**. It is through these guidelines that we will continue to pursue our **Mission** and **Vision** while adhering to our core **values**: Loyalty, Integrity, and Exceeding Expectations. It is these values which drive us to be competitive in the marketplace and to hold ourselves **accountable** to all our stakeholders including customers, suppliers, employees, and our local communities.

Let this Code of Conduct serve as a guide for all our daily business practices, setting high standards for **ethical business conduct**. Only by creating an **inclusive**, **fair**, **and positive work environment** can we succeed in the workplace; and only by **doing what is right**, **not just what is easy**, can we succeed amongst our competitors.

I ask that you apply our Code to your daily activities and don't be afraid to use the Code of Conduct in conversations with customers, suppliers, or fellow team members. We should all be accountable for our actions, so remember to **speak up**; promote our values, ask questions, and report any potential violations of the Code.

Since our inception nearly 30 years ago, we have striven to become a leader in electronics contract manufacturing. Join me in making a **personal commitment** to living our values and abiding by this Code in everything we do so we can achieve our goal **together**.

President
Anta Electric, Inc

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# **Applicability**

This Code of Conduct ('Code') applies to:

- Everyone working for Anta Electric, Inc. ('Company') regardless of location, role, or level of seniority including all employees, managers, officers, and directors.
- Contractors and consultants who work for and conduct business on behalf of Anta Electric, Inc.

We will make good faith efforts to have our suppliers, distributors, agents, and any other contractors commit to this code or to their own set of similar policies when conducting activities on behalf of our Company.

It is the duty of Human Resources and Managers to provide appropriate support to enable their teams to understand and apply the requirements of this Code, the relevant supporting regulations, and the international and local laws of the countries in which they work.

This Code does not cover all Company rules but rather outlines general principles by which we all should measure our conduct. For more detailed policies, we are encouraged to reference SOP-000 Anta Electric Employee Handbook.



# Personal Commitments to Integrity



- 1. We are honest, sincere, and accountable to each other for our actions we promptly raise any questions or concerns about potential violations of our Code
- 2. We are polite and respectful to each other and our stakeholders we are fair, trustworthy, and collaborative in all our business activities
- 3. We develop innovative solutions consistent with our Code we follow all applicable laws and our principles of ethics and integrity
- **4. We help build a sustainable future** we exercise sound health and safety practices, respect human rights, and protect the environment
- **5.** We work with a strong sense of pride for our Company we safeguard its reputation, brand, and assets and exceed the expectations of our stakeholders

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## 1. Core Principles

#### 1.1 Honest and Ethical Business Conduct

Our reputation as an ethical company is one of our most valuable assets and crucial to our continued success. Anta's policy is to comply with all applicable laws and regulations of the countries and regions in which we operate and to conduct our business activities in an honest, ethical, and responsible manner. We respect each other and value fairness, loyalty, and integrity. We have a responsibility to understand and follow legal and internal policy requirements that apply to our jobs.

## 1.2 Relationship with Stakeholders

Anta's fundamental responsibility to society is to pursue its corporate value enhancement through innovation and sound business practices while contributing to developing a sustainable society. We will all give due consideration to the impact of our business activities on the interests of our stakeholders including customers, employees, suppliers, partners, and local communities.

## 1.3 Respect for Human Rights

Anta believes that all human beings should be treated with dignity and respect. Anta is committed to upholding internationally recognized human rights for all people. We will all use reasonable efforts to avoid causing or contributing to adverse human rights impacts that may arise from our operations, services, and/or business relationships and will act diligently to help remediate any impacts that may occur.

## 1.4 Appreciating Diversity

Diversity is inherently human and it is a core corporate responsibility of Anta to uphold and embrace diversity in our business, Anta personnel, business partners, and other stakeholders. As members of a company that conducts business in a number of regions and countries, we recognize that conduct that is socially and professionally acceptable in one culture or region may be viewed differently in another. We will give careful consideration to such differences when performing our duties.

# 2. Fair Labor and Employment Practices

## 2.1 Equal Employment Opportunity / Non-Discrimination

We seek to create a culture that allows all Anta personnel to blossom and contribute their unique talents and skills so as to provide the best services to our customers. Anta is committed to recruiting, hiring, training, promoting, and otherwise treating applicants and employees without discrimination based on factors that are unrelated to Anta's legitimate business interests. For more detail on Anta's EEO policy, please refer to SOP-000.

#### 2.2 No Forced Labor / Child Labor

Anta will not use any form of forced or involuntary labor where people are forced to work against their will, including forced labor to work off a debt, prison labor, or human trafficking.

In addition, Anta will not use child labor. "Child" means a person younger than 14 years old or the local legal minimum age for labor, if it is higher. Anta will comply with all local regulations in regards to minors working in hazardous occupations and hours that minor employees are able to work.

## 2.3 Sound Labor and Employment Practices

Anta has adopted sound labor and employment practices and endeavors to ensure Anta personnel are treated in accordance with the applicable laws and regulations of the countries and regions in which it operates.

Anta respects all employee's rights to Freedom of Assembly and complies with all regulations as set forth in the National Labor Relations Act.

#### 2.4 Work Environment

Anta understands that to foster a productive work environment, we must create a healthy and safe space that is free from discrimination or harassment, in which all individuals are treated with respect and dignity. Anta complies with all applicable local laws that prohibit discrimination and harassment. Anta will not tolerate any form of discrimination or harassment of any kind, including sexual harassment or other behaviors that create a hostile work environment. We will also adhere to all applicable health and safety laws and regulations as well as internal rules and policies to help ensure workplace safety. For more detail, please refer to SOP-000.

# 3. Responsibility for Services

## 3.1 Quality

Anta was built on the promise of doing everything we can to help our customers succeed and stay competitive in the marketplace. We achieve this through the delivery of the highest quality products and services that comply with applicable specifications, customer requirements, and industry standards and regulations.

#### 3.2 Environmental Conservation

Anta recognizes the importance of preserving the environment and creating a quality of life for all humanity and for future generations to come. Anta is committed to the creation of a more sustainable society by minimizing our environmental footprint throughout the lifecycle of our operations and other business activities. We will endeavor to evaluate and implement programs that meet or exceed legal requirements and consider environmental impact as a fundamental criterion when evaluating projects or operations.

## 3.3 Advertising and Marketing

Anta sells services based on their merits. Anta does not engage in false or misleading advertising or advertising that slanders others.



## 4. Protection of Intellectual Assets

## 4.1 Intellectual Property / Confidential or Proprietary Information

Information is a valuable corporate asset which differentiates companies from their competitors. Anta's services revolve around the information entrusted to us by our customers. We will all work together to protect Anta's intellectual property and confidential or proprietary information. We will safeguard all intellectual property and confidential or proprietary information that our suppliers, business partners, or customers entrust to Anta. "Confidential or proprietary information" is any important or valuable information that has not been disclosed to the general public. It includes inventions, creations, know-how, and trade secrets as well as financial information, corporate strategy. marketing programs, and information about relationships with customers, suppliers, and business partners.

We may not disclose or distribute any confidential or proprietary information except as authorized by the Operations Manager or an Officer of the company. We will use such information only for the purpose permitted by the company in connection with our duties at Anta. For more detail, refer to SOP-000.

### **4.2 Personal Information**

Anta respects the privacy of individuals, such as Anta personnel and employees of suppliers, customers, and business partners. We will observe and comply with all applicable laws and regulations as well as applicable internal rules and policies whenever collecting, maintaining, using, disclosing, or disposing of personal information.

## 4.3 Information Security

Anta recognizes the importance of information security both in achieving financial success and maintaining the trust of our stakeholders. We must all help keep our information resources and information systems safe by following our information security policies and procedures.

## 5. Fair Business Practices

## **5.1 Fair Competition**

Anta's policy is to comply with all applicable antitrust, competition, and fair trade laws and regulations of each country and region where Anta conducts business. These laws and regulations are designed to prohibit agreements or practices that fix prices, divide markets, limit production, or otherwise impede or destroy fair competition in markets. We must know and comply with those laws and regulations applicable to our jobs. When any doubt exists as to the legality of any proposed action or agreement, we must promptly discuss the matter with our legal department and/or advisors.

## **5.2 Trade Controls**

Anta complies with applicable trade control laws and regulations. These laws and regulations prohibit or restrict sales or other transactions involving certain products, services, software, and technologies to certain countries, individuals, or entities to secure international peace and security. We must know and comply with those laws and regulations applicable to our jobs at Anta.

#### **5.3 Fair Procurement**

Anta selects its suppliers and contractors on the basis of competitive price, quality, delivery, and other objective standards.

Anta expects its suppliers and contractors to adhere to Anta's ethical values and comply with applicable Anta policies concerning compliance with laws, respect for human rights, fair labor and employment practices, environmental conservation, and the safety of products and services.

## **5.4 Anti-Corruption**

Anta prohibits corrupt practices in any form, including bribery, kickbacks, and other unlawful payments. Anta personnel may not make any payment or provide any gifts, entertainment, or other business amenity to individuals employed by current or prospective Anta customers, suppliers, or other business partners for improperly influencing them to obtain or retain business, or to secure any improper business advantage. In addition, Anta personnel may not accept any payment or any gifts, entertainment, or any other business amenity that appears to influence their business decisions.

We will observe applicable laws and regulations as well as our internal rules and policies with respect to giving and receiving gifts, entertainment, and other benefits.

## 6. Responsible Business Conduct

## 6.1 Sound Decision Making

Business decisions must be made on an informed basis, in good faith, and in the honest belief that the action taken is in the best interest of Anta. We will check and ensure that the decision to be made will satisfy at least the following preconditions:

- a) It will not violate any applicable law, regulation, or internal rule or policy
- b) No personal interest or self-dealing is involved
- c) It is made within individual authority levels given by the company
- d) It is made with due care following a reasonable effort to become familiar with the relevant and available facts
- e) It is made in good faith based upon a reasonable belief the decision serves the best interests of Anta

The design of the organizational structure and personnel assignments are important factors that help ensure sound decision making. When structuring an organization or making personnel assignments, managers at Anta will pay reasonable attention to introducing appropriate measures such as segregation of duties and checks and balances, depending upon the nature and size of its operations, to help ensure sound business decisions.

## 6.2 Recording and Reporting of Information

We must ensure that all records and reporting of information, including but not limited to books and other financial records, will be accurate, complete, honest, and timely and will be a fair representation of facts. We should never cause records to be inaccurate or create records that are misleading or artificial.

## **6.3 Tax Compliance**

It is Anta's policy to comply with all applicable tax laws and regulations for each country and region where Anta conducts business as well as the common rules and guidance regarding international taxation.

## 6.4 Anti-Money Laundering

Anta is committed to complying fully with all money laundering laws and regulations for each country and region where Anta conducts business. We do business with reputable customers involved in legitimate business activities. We will avoid unacceptable means of payment and be alert to any other suspicious forms or methods of payment.

## 7. Ethical Personal Conduct

#### 7.1 Personal Conflicts of Interest

We must always act in Anta's best interests and avoid any situation where our loyalties may be divided between Anta's interests and our own interests – such as a financial or other business relationship with a supplier, customer, or competitor – that would impair our independent judgment. Even if nothing wrong is intended, the appearance of a conflict can cause others to doubt our fairness and have a negative effect on Anta's reputation and business.

Each of us should refer to SOP-000 for guidance in the event of any situation that might be or might appear to be a conflict with Anta's interest. Prompt and full disclosure is the key requirement should any such situation arise. We must faithfully notify a manager/supervisor, the human resources department, and/or the legal department and/or advisors so that the situation can be reviewed and approved, if appropriate.

## 7.2 Corporate Assets

Anta's assets are to be used only for legitimate business purposes and only by authorized Anta personnel or their designees. We have a duty to protect Anta's assets from loss, damage, misuse, theft, or sabotage. "Anta's assets"

cover both tangible and intangible assets, including brand, trademark, know-how, confidential or proprietary information, and information systems. We must not pursue personal benefits using Anta's assets. To the extent permitted under applicable laws, Anta reserves the right to monitor and inspect how its assets are used by Anta personnel, including inspection of all e-mail, data, and files.

#### 7.3 Public Relations

Our personal and business personas are likely to overlap online. When using social media (including personal social media accounts), we must adhere to Anta's internal policies and rules so that we will not give the appearance that we are speaking on behalf of Anta. When we come across posts that are negative to Anta or require a reply, we will not directly respond ourselves, but will contact the official communication teams within Anta to handle the situation.

8. Individual Responsibility

## **8.1 Reporting Concerns**

Speaking up is not always easy, but when we raise concerns, we protect Anta and our colleagues from harm. If we think that any Anta personnel may have engaged in unethical or illegal conduct, we have a duty to our colleagues and to Anta to promptly report our concerns. We are all expected to participate in an investigation, when asked.

Anta encourages us to raise questions or concerns about any possible violation of the law or Anta policy to our managers or human resources department. Reports may be made by name or anonymously. All information provided in regards to reporting is handled confidentially to the extent allowed by the circumstances and local law.

### 8.2 Non-Retaliation

Anta does not allow any form of retaliation against anyone for making a good faith report or for participating in an investigation of a report. Anyone who makes a good faith report will be treated fairly and respectfully. For more detail, refer to SOP-000.





This photo shows the beginnings of Anta Electric, nearly 30 years ago. It is important to remember where we came from when thinking about where we are going. When we consider this Code of Conduct, we should think about all the progress Anta has made and the importance of preserving Anta's reputation and brand by following these principles so that we may continue to flourish together.

## Anta Electric Code of Conduct

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