

INTRODUCTION

Phalcon, Ltd. (“Phalcon”) is a national leading provider of electrical and communication infrastructure services. Phalcon conducts business with honesty and integrity, treating all people with respect and providing excellent customer service. Phalcon seeks to achieve mutually beneficial supplier relations based on shared passion to performance excellence and superior customer service.

OVERVIEW

The Supplier Code of Conduct (“Code”) provides clarity to suppliers regarding Phalcon’s expectations of ethical and responsible corporate business practices. These requirements are applicable to suppliers of Phalcon and its affiliates and companies nationally. Phalcon may change the requirements of this Code based on changes in law or changes in Phalcon’s supplier management program.

Compliance with this Code is mandatory and Phalcon reserves the right to terminate business relationship with upon violation of the Code. The expectations outlined in this Code do not replace specific requirements in contracts or terms and conditions between Phalcon and our suppliers. If a contractual term is stricter than this Code, the supplier must meet the stricter contractual requirement. This Code does not alter contractual terms or constitute express or implied contractual obligations or a contract of employment.

Suppliers are expected to comply with all laws of the countries in which they operate; however, within the scope of such compliance, where local or regional laws are less restrictive than the principles of this Code, we expect our suppliers to follow this Code. Conversely, when local or regional laws are more restrictive than this Code, we expect our suppliers to follow the local or regional laws.

COMMITMENT TO ETHICS AND INTEGRITY

As part of our continued commitment to ethical and responsible business practices, Phalcon is dedicated to working with suppliers, manufacturers, contractors, consultants and third parties or intermediaries (collectively “Suppliers”) who maintain a similar commitment to strong ethical standards, safe and healthy working environments, protection of human rights and dignity, protection of the environment and compliance with the law. Suppliers shall commit to the highest standards of ethical conduct when dealing with its employees, suppliers, customers and any other constituent related to your engagement.

PROHIBITION OF BRIBERY AND CORRUPTION

Suppliers must not engage in illegal payments or corruption or tolerate the offer of gifts, favors or entertainment where they are intended or appear intended to obligate the receiver. Suppliers must not participate in extortion, fraud, embezzlement, bribery or kickbacks. We take a zero-tolerance approach to bribery, fraud, or any other forms of corruption and are committed to acting professionally, fairly, with integrity and in compliance with all applicable anti-bribery and corruption laws wherever we operate.

WORKPLACE HEALTH AND SAFETY

Phalcon is committed to the safety and health of its employees, customers, suppliers and the community. Suppliers are expected to provide and promote secure, safe and healthy working environment that supports accident prevention and minimized exposure to health risks. Suppliers must have well-established safety procedures, preventative maintenance and protective equipment in compliance with the law and comply with the Phalcon Safety Program and communicate expectations of behavior and responsibilities to all employees. Suppliers are expected to maintain a drug-free workplace, and comply with all applicable national, regional and local health and safety regulations, laws and practices.

RESPONSIBILITY TO THE EARTH

Suppliers shall operate in an environmentally responsible and sustainable manner to minimize adverse impacts to the environment and must comply with all environmental laws, including those relating to hazardous materials, wastewater, solid waste and air emissions. We encourage suppliers to reduce the environmental impact of their operations and safeguard the natural resources on which we all depend, especially through reasonable efforts to reduce or eliminate waste of all types. Such efforts include source reduction, recycling, composting, reusing materials and conserving water and energy.

HUMAN RIGHTS AND FAIR LABOR CONDITIONS

Suppliers shall uphold the highest standards of human rights within their organizations. This includes, but is not limited to:

Equal Opportunities

Promote equal opportunities for, and treatment of employees irrespective of skin color, race, nationality, social background, disability, sexual orientation, gender reassignment, pregnancy, maternity, political or religious conviction, sex or age.

Respect and Dignity

Keep workplaces free of harassment, abuse, harsh treatment, violence, intimidation, corporal punishment, mental or physical coercion, verbal abuse and discrimination.

Employment Eligibility

Only employ workers with a legal right to work. All employees shall be allowed the choice to leave their employment freely upon reasonable notice.

Human Trafficking & Modern Slavery

Comply with laws and regulations governing human trafficking and modern slavery. Prevent forced labor, child labor, bonded labor, indentured labor, involuntary labor, slavery or trafficking in persons.

Responsible Sourcing of Materials

Suppliers shall exercise due diligence on relevant materials and practice responsible sourcing of materials practices, in order to determine whether relevant materials originate from regions of high risk and activities which include severe health and safety risks and negative environmental impacts.

Wages and Benefits

Provide fair wages, equal to or exceeding the applicable statutory minimum wage and provide and benefits required by law and/or contract. Comply with the maximum number of working hours permitted under any applicable laws or regulations and ensure that all overtime is voluntary.

Freedom of association

Respect the freedom of employees to join, or refrain from joining, legally authorized associations or organizations, including trade unions.

REPORTING OF VIOLATIONS

Supplier shall accurately and promptly report suspected violations of this Code to Phalcon. We will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or a possible violation of this Code.