



**TLINGIT HAIDA**

TRIBAL BUSINESS CORPORATION

**SUPPLIER CODE  
OF CONDUCT**

# Supplier Code of Conduct



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## **Purpose**

This Code of Conduct defines the basic requirements placed on THTBC suppliers concerning their responsibilities toward their stakeholders and the environment. THTBC reserves the right to reasonably change the requirements of this Code of Conduct periodically in accordance with the THTBC Compliance Program. THTBC expects suppliers to adhere to the Code of Conduct and accept reasonable, periodic changes.

## **Dignity and Respect**

We expect our suppliers to treat people with respect and dignity, to act ethically, and to promote equal opportunities for and treatment of its employees irrespective of skin color, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age. Suppliers must refrain from violating the rights of others and they must address any adverse human rights impacts from their operations. Subcontractors should not refuse to employ or make anyone work against his or her will.

## **Child Labor**

Suppliers must ensure that child labor is not used in the performance of work. The term “child” refers to any person under the legal age for employment where the work is performed. More specifically, suppliers shall not employ workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14.

## **Human Trafficking**

We fully support the elimination of human trafficking and slavery from the supply chain and do not tolerate any trafficking in persons, both in the U.S. and globally. Suppliers must adhere to regulations prohibiting human trafficking including FAR 52.222-50 and comply with all applicable laws in the country or countries in which they operate. For more information, refer to the THTBC Combatting Trafficking in Persons Policy and Compliance Plan.

## **Harassment**

Our suppliers should ensure that their employees are afforded an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct. Additionally, suppliers should prohibit harassing behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

## **Wages and Benefits**

Our suppliers should provide fair remuneration and guarantee the applicable local statutory minimum wage and provide all legally mandated benefits. We expect suppliers to comply with the maximum number of working hours laid down in the applicable laws. In addition to payment for regular hours of work, workers must be paid for overtime at such premium rates as are legally required.

## **Social Dialogue**

We expect our suppliers to recognize the right of free association of employees and to neither favor nor discriminate against members of employee organizations or trade unions. Suppliers are expected to respect the rights of workers to communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal.

## **Ethical and Legal Business Practices**

Our suppliers must not seek to gain advantages through unfair, unethical, or illegal business practices.

## **Anti-Corruption Laws**

Our suppliers must comply with all applicable anti-corruption laws, directives and regulations, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act.

We require our suppliers to refrain from offering or making any improper payments of money (or anything of value) to government officials, political parties, candidates for public office, or other persons. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action that the government official is already obligated to perform such as obtaining a visa or customs clearance, even in locations where such activity may not violate local law.

Payments made to protect personal safety are permitted where there is an imminent threat to health or safety but must be properly recorded and reported to the buyer representative as promptly as possible under the circumstances.

We require our suppliers to use due diligence to prevent and detect corruption in all business arrangements including:

- Partnerships
- Subcontracts

- Joint Ventures
- Offset agreements
- Hiring of intermediaries such as agents or consultants

## **Prohibition of Corruption and Bribery**

Our suppliers should tolerate nor engage directly or indirectly in any form of corruption or bribery and should not grant, offer or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage.

## **Anti-Trust**

Our suppliers should act in accordance with national and international competition laws and not to participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors. We also expect our suppliers to respect the intellectual property rights of others.

## **Conflict of Interest**

Our suppliers must avoid all conflicts of interest that may adversely influence business relationships. We require our suppliers to provide notification to affected parties if an actual or potential conflict of interest arises, including conflicts between the interests of our company and the personal interests of a supplier's employees or those of close relatives, friends, or business associates of a supplier or its employees.

## **Gifts/Business Courtesies**

We believe our suppliers should compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage or exercise improper influence. In any business relationship, our suppliers must ensure that the offering or receipt of any gift is permitted by law and regulation and complies with any contractual obligations. Any exchanges must not violate the rules and standards of the recipient's organization and must be consistent with reasonable marketplace customs and practices.

## **Procurement Integrity**

Our suppliers must maintain the integrity of our procurement and acquisition processes. Suppliers may not improperly use competitors' confidential or proprietary information for their own benefit. If a supplier becomes aware of any such confidential or proprietary information, they should promptly take steps to avoid its improper use and inform our

Company as appropriate.

## **Good Trade Practices**

Our suppliers must ensure their business practices are in accordance with all applicable laws, directives and regulations regarding the import and export of parts, components, and technical data. We require our suppliers to provide truthful and accurate information and obtain appropriate licenses and/or consents where necessary.

## **Conflict Minerals**

Our suppliers must take reasonable efforts to avoid in its products the use of raw materials which directly or indirectly finance armed groups who violate human rights.

## **Anti-Boycott**

Our suppliers must not participate in, cooperate with, or further the cause of any unsanctioned foreign economic boycott, in accordance with the U.S. 1977 Export Administration Act and the U.S. 1976 Tax Reform Act, or similar legislation or regulations.

## **Protecting Information, Intellectual Property, and the Supply Chain**

We expect our suppliers to use reasonable efforts to promote among its suppliers compliance with this Code of Conduct and to comply with the principles of non-discrimination with regard to supplier selection and treatment.

## **Confidentiality of Sensitive Information**

Suppliers must maintain the confidentiality of all information entrusted to them by us, our customers or other third parties, except where disclosure is authorized or legally required (and only then after notice). We require our suppliers to properly handle and protect from improper disclosure any sensitive information, including classified, controlled, proprietary and personal information; competition sensitive information and intellectual property. Information should not be used for any purpose (e.g., advertisement, publicity) other than the business purpose for which it was provided, unless there is prior authorization from the owner. Suppliers must comply with all contractual obligations and applicable laws, including data privacy laws.

## **Intellectual Property**

We require our suppliers to respect and comply with all applicable laws and other binding obligations governing intellectual property rights, including protection against:

- Disclosure
- Patents
- Copyrights
- Trademarks

## **Cybersecurity**

Suppliers must take care to safeguard and protect information generated or developed by them in support of our programs from unauthorized access, destruction, use, modification or disclosure. We expect suppliers to have risk-based cybersecurity programs design to mitigate emerging threats to their information systems, products and services and supply chain, and to comply with all applicable contractual and legal requirements.

## **Security of Supply Chain**

We expect our suppliers to have good security practices across the supply chain and organization. Suppliers should maintain processes and standards designed to assure the integrity of services. Suppliers must follow all applicable contractual, FAR, and DFAR requirements regarding security practices.

## **Accurate Records**

Suppliers must create and maintain accurate records. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. When a record is no longer needed to conduct current business, records should still be retained based on the applicable retention requirements. Suppliers must not falsify or provide fraudulent records, billings or other statements to us or our customers.

## **Health and Safety in the Workplace**

### **Health and Safety of Employees**

We require our suppliers to comply with all applicable health and safety laws, regulations, and directives. Suppliers should take responsibility for the health and safety of its employees; control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases. We expect our suppliers to provide training and ensure that employees are educated in health and safety issues. Suppliers are also expected to set up or use a reasonable occupational health & safety management system.

## **Environmental protection**

We require our suppliers to act in accordance with the applicable statutory and international standards regarding environmental protection and to minimize environmental pollution and make continuous improvements in environmental protection. We expect suppliers to set up or use a reasonable environmental management system.

## **Ethics Program Expectations**

We require suppliers to maintain an effective ethics and compliance program and meet the requirements of this Code of Conduct for Suppliers.

## **Whistleblower Protection**

Our suppliers should provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation. Our suppliers should also take action to prevent, detect, and correct any retaliatory actions.

## **Consequences for Violating Code**

In the event of a violation of this Code of Conduct for Suppliers, we may pursue corrective action to remedy the situation. In the case of an actual or possible violation of law or regulation, we may be required to report to proper authorities. We reserve the right to terminate our relationship or take any other appropriate action with any supplier under the terms of the existing procurement/purchasing contract.

## **THTBC Ethics Program**

The THTBC Ethics Hotline and Website is a means to raise concerns or report a suspected violation and is available not only to employees, but suppliers and other external stakeholders. The Hotline and Website is available 24/7 and is administered by an external company. Regardless of whether using the hotline or website, reports can be made anonymously if allowed by local laws.





**THTBC Ethics Hotline Information**

**Website:** [www.lighthouse-services.com/thtbc](http://www.lighthouse-services.com/thtbc)

**Toll-Free Telephone:**

English speaking USA: 866-880-0003

Habla Español EE UU: 800-216-1288

**Outside the U.S.:**

All other countries: 800-603-2869 (must dial country access code first [click here](#) for access codes and dialing instructions)

**E-mail:** [ethics@thtbc.com](mailto:ethics@thtbc.com)