

Review Date: March 2020

Supplier Code of Conduct

Purpose/Scope

Laird expects all employees to act professionally, honestly, morally, ethically, with integrity and lawfully in all their dealings within Laird and with our business partners, customers and other stakeholders. Laird also expect our business partners to uphold the same commitment and principles. This Supplier Code of Conduct sets out the business standards expected from suppliers of goods and services to Laird.

Responsibilities

As Laird suppliers, you are responsible for ensuring that any current or new employees or agents of your corporation that interact or do business with Laird understands our expectations and standards. Suppliers are responsible for ensuring that their employees and vendors are aware of Laird's business conduct and ethics expectations and ensure they follow them.

From time to time we may require our business partners to confirm in writing that they have complied with the expectations in this Supplier Code of Conduct and any applicable laws. Failure to submit confirmation when requested may result in termination of the business relationship. You are expected to report any violations of this Supplier Code of Conduct to Laird promptly whether they are your employees or vendors and / or Laird employees. Confidentiality will be strictly maintained.

Standards

General Business Philosophy

Laird's business philosophy to doing business with external partners is as follows:

- Strict compliance with the law
- Respect for competition
- No actual or perceived conflicts of interest
- Compliance with Laird's business and ethics standards set out in this document and any referenced documents.

In addition, we also encourage our suppliers to meet the Responsible Business Alliance (RBA) Code of Conduct in its entirety including its elements related to Labor, Health & Safety, Environment, Management System and Ethics. <http://www.responsiblebusiness.org/code-of-conduct/>

Key Standards of Business Conduct with Suppliers

Family Members Doing Business with Laird Employees

Laird employees may not engage in transactions on behalf of the company with suppliers who are family members or have a substantial beneficial interest where they serve as a trustee or in a fiduciary capacity.

Suppliers must sign Laird's Non-Disclosure Agreement (NDA)

A prerequisite to doing business with Laird is accepting and signing a copy of our NDA as well as other relevant required commercial agreements. This document must be signed and agreed before any confidential technical or business information can be exchanged between companies.

Business Awards and 'Kickbacks'

Laird treats all potential suppliers fairly, openly and considers all interested/qualified suppliers when we purchase goods or services based on their ability to meet our business needs. We demand fair, transparent negotiation and bidding processes, conducted in the utmost professional manner when working with our procurement and sourcing representatives.

Under no circumstances are suppliers allowed to offer 'kickbacks' or rebates to try to entice a Laird employee to choose a supplier nor should any employee of Laird request such treatment from you in order to earn our business. A kickback refers to any money, fee, commission, credit, gift, gratuity, or item of value or compensation of any kind, which is provided, directly or indirectly, for the purpose of improperly obtaining or rewarding favorable treatment in connection with a contract or relationship from Laird.

Business Gifts

Please be aware that all Lairds' employees are required to adhere to strict policies related to gifts and entertainment with suppliers.

International Corruption Law

Our employees are required to abide by the U.S. Foreign Corrupt Practices Act (FCPA) and United Kingdom's Bribery Act 2010. We expect our suppliers to abide by these same regulations and any other applicable local laws relating to bribery and corruption.

Counterfeit Components Usage

Laird is taking action to increase awareness and controls in our supply chain in order to seek to prevent counterfeit components from entering our production processes. We expect our suppliers to implement anti-counterfeit procurement measures and to ensure that they utilize only authorized suppliers and distributors. Laird reserves the right, from time to time, to audit its suppliers' preventative processes in this area.

Supply Chain Security

Laird is committed to assessing, managing, and improving its supply chain security. It is Laird's intent to work with their business partners as a team to improve supply chain security practices. We expect your company will comply with the U.S. Customs "C-TPAT: Customs-Trade Partnership Against Terrorism" minimum security requirements. Further information and updates to these requirements can be found at the U.S. Customs and Border Protection's website at: <http://www.cbp.gov/border-security/ports-entry/cargo-security/c-tpat-customs-trade-partnership-against-terrorism>

Trade Compliance

It is Laird's policy to fully comply with all applicable import, export, customs and trade compliance regulations, licensing requirements, and other relevant U.S. and international laws. Suppliers are required to adhere to all governmental trade compliance import and export regulations involving Laird's shipments.

No Forced Labour, Slavery or Human Trafficking

Laird is committed to eradicating slavery, forced labour and human trafficking from its supply chain. All its direct suppliers are required to comply with Laird's Human Trafficking and Slavery Policy (available on request from Laird) and by accepting orders certify that they do. The policy requires direct suppliers to impose similar obligations on their suppliers.

Equal Employment and Human Rights

Laird is committed to recruiting and selecting applicants for employment solely on the basis of their qualifications and suitability for the position in question. It is Laird's policy to recruit the most capable person available for each position. Laird recognizes the need to treat all employees honestly and fairly, respecting their individual and collective rights. Accordingly, Laird expresses its support for the International Labor Organization's eight Core Conventions recognized as being fundamental to the rights of human beings at work. <http://www.ilo.org/global/standards/lang--en/index.htm>

Restricted Substance Compliance

Laird is dedicated to ensuring that our operations and products strictly comply with all applicable laws, regulations and customer requirements (including REACH and RoHS) regarding banned, restricted and reportable substances. Laird may from time to time issue specific guidance to its suppliers setting out Laird's standards for banned, restricted and reportable substances within our products and packaging. In order to conduct business with Laird, suppliers are, upon request, expected to declare the material content of products delivered to Laird and to certify compliance with all requirements contained within applicable regulations and within any guidance issued by Laird or contained in purchase orders, drawings or purchased part specifications.

Human Rights in Minerals Mining in Central Africa (Conflict Minerals)

Human rights violations related to the trade in minerals from the conflict zones in the Democratic Republic of Congo (DRC) are a focus of Laird's supply chain and environmental responsibilities. Laird requires its suppliers not to source materials defined in the Dodd-Frank Act and their derivatives

(including gold, tin, tantalum and tungsten metals) from the conflict zones in the Democratic Republic of Congo (DRC). We expect suppliers to conduct their worldwide operations in a manner that does not result in labor or human rights violations, including operations that contribute to the direct financing of armed conflict. In order to support this requirement suppliers are required to establish due diligence processes consistent with published guidance in order to make it possible to verify whether conflict minerals are contained in products sold to Laird and to provide such information to Laird on request.

How to Report an Ethics Concern to Laird

To report a questionable behavior or possible violation of the Supplier Code of Conduct, Laird has a variety of resources available to assist you as our supplier. Suppliers are encouraged to work with their primary Laird contact in resolving a business practice or compliance concern. However, Laird recognizes that there may be times when this is not possible or appropriate.

Reporting of Questionable Behavior and/or Possible Violations

- When reporting a concern, suppliers or vendors should indicate that they are reporting on behalf of “Laird” rather than their supplier company name
- Provide specific information about which Laird site or organization is associated with the concern
- Your concern will be held in complete confidence, and you can remain anonymous if you choose. However, providing contact information will help us investigate your concern
- Reports can be submitted to our independent Ethics Hotline provider “Safecall” via a web portal (www.safecall.co.uk/report) (please choose your language from the menu of options), or by telephoning them on the relevant phone number for your country from the list on the following page

Laird will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought our advice or has reported questionable behavior and/or a possible violation.

Country	Freephone Number	Availability	Non-Freephone Number	Language Options
Canada	1877 59 98073	No Restriction	+44 191 516 7768	English, Latin American Spanish, Italian, German, French, Portuguese, Dutch
Czech	00 800 72332255	No Restriction	+44 191 516 7752	English, Polish, Hungarian, Romanian, Czech, Slovak, Croatian, Slovenian
China	10800 7440605	China Unicom/Netcom	+44 191 516 7753	English, Mandarin, Cantonese, Japanese, Thai, Malay, Vietnamese, Korean, Indonesian, Tamil
	10800 4400682	China Telecom		
	4008 833405	Shared Cost		
France	00 800 72332255	Includes dependencies La Reunion; Martinique; Guadeloupe; French Guyana	+44 191 516 7751	English, German, French, Spanish, Portuguese, Italian, Dutch, Polish
Germany	00 800 72332255	No Restriction	+44 191 516 7751	English, German, French, Spanish, Portuguese, Italian, Dutch, Polish
Hong Kong	3077 5524	No Restriction	+44 191 516 7753	English, Mandarin, Cantonese, Japanese, Thai, Malay, Vietnamese, Korean, Indonesian, Tamil
India	000 800 440 1256	No Restriction (Some mobile providers not supported)	+44 191 516 7756	English, Arabic, Hindi, Urdu, Bengali, Farsi, Sinhalese, Tamil
Italy	00 800 72332255	No Restriction	+44 191 516 7751	English, German, French, Spanish, Portuguese, Italian, Dutch, Polish
Japan	0120 921067	No Restriction	+44 191 516 7753	English, Mandarin, Cantonese, Japanese, Thai, Malay, Vietnamese, Korean, Indonesian, Tamil
Malaysia	1800 220 054	No Restriction	+44 191 516 7753	English, Mandarin, Cantonese, Japanese, Thai, Malay, Vietnamese, Korean, Indonesian, Tamil
Mexico	01800 1231758	No Restriction	+44 191 516 7768	English, Latin American Spanish, Italian, German, French, Portuguese, Dutch
Singapore	800 4481773	No Restriction	+44 191 516 7753	English, Mandarin, Cantonese, Japanese, Thai, Malay, Vietnamese, Korean, Indonesian, Tamil
South Korea	001 800 72332255	Korea Telecom	+44 191 516 7753	English, Mandarin, Cantonese, Japanese, Thai, Malay, Vietnamese, Korean, Indonesian, Tamil
	002 800 72332255	Dacom		
Sweden	0850 252 122	No Restriction	+44 191 516 7755	English, Danish, Finnish, Swedish, Norwegian
Switzerland	00 800 72332255	No Restriction	+44 191 516 7751	English, German, French, Spanish, Portuguese, Italian, Dutch, Polish
Taiwan	00 800 72332255	No Restriction	+44 191 516 7753	English, Mandarin, Cantonese, Japanese, Thai, Malay, Vietnamese, Korean, Indonesian, Tamil
UAE	8000 4413376	No Restriction	+44 191 516 7756	English, Arabic, Hindi, Urdu, Bengali, Farsi, Sinhalese, Tamil
UK	0800 9151571	No Restriction		
USA	1 866 901 3295	No Restriction	+44 191 516 7768	English, Latin American Spanish, Italian, German, French, Portuguese, Dutch
Vietnam	120 11157	VNPT	+44 191 516 7753	English, Mandarin, Cantonese, Japanese, Thai, Malay, Vietnamese, Korean, Indonesian, Tamil
	122 80725	Viettel		



Laird Business Addendum to MSA, SPA or Purchase Order Terms and Conditions

Suppliers wishing to conduct or continue to do business with Laird must sign, or electronically accept, to acknowledge that they have read the Laird Supplier Code of Conduct; and in doing so, certify that they intend to comply with the principles contained therein and notify those employees involved in conducting business with Laird.

_____ **(Supplier Name)** acknowledges they have received, read and accept Laird’s Supplier Code of Conduct and will notify all current and new employees engaging in business with Laird regardless of supplier entity location(s), employee function or employee location. By signing below, the signatory confirms that he/she is an authorized signatory of and authorized to legally bind the Supplier.

Supplier Name: _____

Laird Account Representative Contact: _____

Supplier Address: _____

Supplier City, State, County, Postcode: _____

Phone Number(s): _____

Email Address: _____

Signed: _____

Name: _____

Title: _____

Dated: _____

Sign and return executed Addendum via email to your business contact at Laird