

# CORPORATE CODE OF CONDUCT

## LABOR

**The Indium Corporation respects the rights of all workers, and treats them with dignity and respect, abiding by the laws governing each of our locations. Policies, procedures and practices, together with local laws, guide compliance with:**

- The freedom to work for Indium Corporation voluntarily and without force. We will never require the payment of fees in exchange for work.
- Employing people at or above the legal working age.
- Compliance with local laws regarding the maximum working hours.
- Competitively compensating workers according to job requirements, expertise, and laws including minimum wage and overtime requirements.
- Establishing a working environment that does not tolerate any harsh, inhumane, or harassing behavior by managers or other employees.
- Communicating and enforcing appropriate disciplinary procedures.
- The freedom from discrimination in hiring practices and in the work environment.
- The means for open and direct communications between employees and company leaders.
- Protection from reprisal for reporting violations of policy.
- Freedom of Association

## HEALTH AND SAFETY

**A safe and healthy work environment is essential to protecting our employees, providing consistently high-quality products, and retaining a qualified skilled workforce. Ongoing training is critical to avoiding situations that compromise the health and safety of our employees. Indium Corporation has the following safeguards deployed:**

### **Occupational Safety, Health, and Industrial Hygiene**

- Proper design and maintenance of equipment and tools
- Proper and well-maintained personal protective equipment
- Proper design and implementation of engineering and administrative controls
- Tracking of workplace injuries
- Preventative and corrective action programs focused on prevention and reduction of workplace injuries
- Identification and control of physically demanding work
- Machine safeguards
- Minimizing employee exposure risk by proper management and control of all chemical, material, and physical hazards
- Maintaining clean and safe changing rooms, personal hygiene facilities, and eating facilities

### **Emergency Preparedness**

- Training on how to handle emergencies
- Adequate and practiced exit and recovery plans

### **Health & Safety Communication**

- Training, in appropriate local language, on all identified job hazards that employees are exposed to
- Health & Safety information is posted and available in areas accessible to employees
- Training is provided in the on boarding process prior to beginning work and periodically thereafter
- All employees are encouraged to raise safety concerns for review and action

## ENVIRONMENTAL

**Environmental responsibility is important to the sustainability of our business, our products, our brand and our place in the community. We are committed to hazardous substance control and management that includes plans for reuse, recycling, proper disposal, and preventing use of identified prohibited chemicals and materials.**

### **Pollution Prevention & Resource Reduction**

- Monitoring and controlling emissions, including wastewater, solid waste, air, and process gases
- Developing waste and resource reduction programs on an economic basis
- Monitoring energy consumption and developing energy reduction programs on an economic basis
- Reporting Greenhouse Gases as calculated from energy consumption
- Recycling for sustainability when economically viable

### **Hazardous Substances**

- Control product content restrictions according to law and customer requirements
- Correct labeling of products according to law and including customer requirements

**Required environmental permits are obtained, maintained and kept current including operational and reporting requirements**



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## ETHICS

- We are committed to compliance with local laws, regulations, and customer requirements as an integral part of the value that we deliver with our products.
  - We are committed to identifying and mitigating the operational risks relative to the RBA/EICC Code of Conduct (the code) through appropriate management systems.
  - We maintain a review system that encourages continuous improvement so that we keep pace with changing customer requirements, and legal and social conditions.
  - We are committed to being accountable and responsible for the code and practice it in all our interactions.
  - We are committed to the need to train our employees on the elements and requirements of the code.
  - We encourage open communication and feedback from our employees through our Bright Ideas and Answer Man programs.
  - We maintain documents and records showing compliance with environmental, health and safety, financial, and customer requirements.
  - We will have regular periodic internal audits of performance to this code and maintain a preventative and corrective action system to provide a process for the timely correction of deficiencies identified by internal audits, third party audits, customer audits, and customer feedback.
  - We will request that our suppliers also adopt a code of conduct that is compliant with the RBA/EICC Code of Conduct.
- The integrity of our people is the cornerstone of our Code of Conduct. Our products stand on their own value and we will not tolerate any business dealings that involve bribes, extortion, misrepresentations of business records, or other unethical conduct.**
- All customer proprietary information and intellectual property will be protected and treated with the same degree of care as we treat our own proprietary and intellectual property information.
  - Standards of fair business advertising and competition will be honored and upheld.
  - All materials and supplies are sourced from properly vetted and qualified sources and supply chains and the sources of the suppliers materials are not from those that violate human rights.
  - We respect and protect the privacy, personal information, intellectual property, and proprietary information of our employees, suppliers, and customers
  - We encourage all employees, customers, and suppliers to report the improper conduct of any employee or representative of the company. Investigations will be conducted in a prompt, thorough, and impartial manner. Confidentiality will be provided to the greatest extent possible to permit a full investigation. Retaliation is prohibited and we will protect, from reprisal, any person who makes such a report.
  - To facilitate confidential reporting of unethical behavior, and to create a path for ethics complaints involving company management, we have created an ethics escalation process that directs complaints to an independent ombudsman. The ombudsman contact is [Indiumhotline@mattlawfirm.com](mailto:Indiumhotline@mattlawfirm.com). The employee code of conduct, anti-bribery policy, and ethics escalation policy are posted on the company website at [www.indium.com/csr/](http://www.indium.com/csr/)
  - We compete fairly and will not engage in behavior that fixes prices or restricts our competition from competing in the marketplace.

The **Indium** Way  
respect. appreciation. achievement.

