



GATEKEEPER SYSTEMS SUPPLIER CODE OF CONDUCT	
Prepared by	Ritchie Taylor
Title	VP Manufacturing & Supply Chain
Company name	Gatekeeper Systems, Inc
Address	90 Icon, Foothill Ranch, CA 92610, USA.
Rev 1	6/15/2023 : document released
Rev 2	6/17/2024 : section 9 added (grievance mechanism)

Gatekeeper Systems is committed to treating all workers with respect and dignity, ensuring safe working conditions, and conducting environmentally responsible, ethical operations. We expect suppliers in our operations and supply chain, and their suppliers, to embrace the following social, environmental, and ethical responsibilities.

Supplier Conformance with Gatekeeper Systems Supplier Code of Conduct:

- **Underlying Obligations.** In addition to these responsibilities, suppliers must comply with all applicable laws, legal regulations, directives, and guidelines; and all obligations in any contract a supplier may have with us.
- **On-Site Work.** Suppliers using our properties or facilities will comply with all of our applicable policies and requirements.
- **Certifications.** If Gatekeeper Systems requests certifications, suppliers will make good faith efforts to obtain such certifications in a timely manner.
- **Information Disclosure.** Suppliers will accurately disclose information regarding their labor, health and safety, environmental practices, business activities, structure, financial situation, and performance, in accordance with prevailing industry practices.
- **Cooperation.** Suppliers will cooperate with any information requests or audits we may initiate to confirm their fulfillment of these responsibilities. Though we seek to collaborate with suppliers to improve conditions, we may terminate our relationship with any supplier that fails to meet these responsibilities.

1. LABOR PRACTICE AND HUMAN RIGHTS

Gatekeeper Systems is committed to upholding the human rights of workers and treating them with dignity and respect. This applies to all workers, including temporary, migrant, student, contract, direct employee, and any other type of worker. As a result, suppliers must manage their own workforce in order to achieve the following results:

- **1.1 Freely Chosen Employment and Combating Modern Slavery.** Suppliers will not use or permit any form of forced, bonded, or indentured labor. All work must be voluntary, and all workers must be free to terminate their employment at any time. Suppliers will not hold workers' identity, immigration, or work permit documents longer than reasonably necessary for administrative processing. Suppliers are expected not to require workers to pay recruitment fees or other fees for their employment, either directly or through third parties, and are expected to repay any worker that has paid such fees. Suppliers will not unreasonably restrict workers' freedom to move into, out of, or at working facilities. As part of the hiring process, suppliers are expected to give each worker a written agreement describing the worker's terms of employment in a language understood by the worker, and, if internationally relocating, the written agreement will be provided before they leave their country of origin.
- **1.2 Young Workers and Student Interns.** Suppliers will not use child labor. "Child" means any person under age 15, under the age for completing compulsory education, or under the minimum age for



employment in the country, whichever is greatest. Workers under the age of 18 will not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers may use legitimate, properly managed apprenticeship programs, such as student internships. Unless otherwise addressed by local law, suppliers are expected to pay student workers, interns, and apprentices at least the same wage rates as other entry-level workers performing equal or similar tasks.

- **1.3 Wages.** Suppliers will pay legally mandated wages and benefits, will comply with the law regarding wage deductions, and will provide workers with the basis on which workers are paid via pay stub or similar documentation. Suppliers will not deduct from wages as a disciplinary measure.
- **1.4 Working Hours.** Except in emergency or unusual situations, hours worked per day/week should not exceed state or local regulations. Workers should be allowed at least one day off every seven days.
- **1.5 Fair Treatment, Non-Discrimination, Diversity and Inclusion.** Suppliers will not permit harassment, abuse, corporal punishment, or inhumane treatment. Suppliers will not subject workers or potential workers to unlawful medical tests or physical exams. Suppliers will not discriminate in screening, hiring, or employment practices based on race, color, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, ethnicity, national origin, caste, disability, genetic information, medical condition, pregnancy, religion, political affiliation, union membership, covered veteran status, or body art. Workers' religious practices will be reasonably accommodated. Suppliers will not inquire about potential workers' criminal histories on employment applications or before initial interviews, or, if no interview is conducted, before making conditional offers of employment. In addition, suppliers will demonstrate a commitment to identify, measure, and improve a culture of diversity and inclusion through all aspects of workplace management.

2. ENVIRONMENTAL

Gatekeeper Systems recognizes that environmental responsibility is integral to producing world-class products. In manufacturing operations and construction, suppliers will strive to create regenerative processes and will minimize adverse effects on the community, environment, and natural resources while safeguarding the health and safety of the public. In addition:

- **2.1 Environmental Permits and Reporting.** Suppliers will obtain and keep current all required environmental permits, approvals, and registrations, and follow their operational and reporting requirements.
- **2.2 Resource Efficiency and Clean Energy.** Throughout their operations, suppliers will work to reduce consumption of resources, including raw materials, energy, and water. Suppliers will track, document, and seek to minimize energy consumption and greenhouse gas emissions, and seek ways to improve energy efficiency and use cleaner sources of energy.
- **2.3 Hazardous and Restricted Substances.** Suppliers will identify and manage chemicals and other materials that pose a hazard to the environment, to ensure their safe handling, use, storage, and disposal. Suppliers will identify, monitor, control, treat, and reduce hazardous air emissions, wastewater, and waste generated from its operations. Suppliers will adhere to our requirements restricting the use of specific substances, including labeling for recycling or disposal.
- **2.4 Waste Mitigation:** Suppliers will work to reduce or eliminate waste of all types. Where waste cannot be eliminated, suppliers will manage and control all waste streams to comply with applicable laws and regulations, and in an environmentally responsible and secure way; this includes, but is not limited to, preventing illegal discharges and spills from entering storm drains, and treating as required prior to



discharge or disposal of all wastewater and solid waste from operations, industrial processes, and sanitation facilities.

3. SUPPLIER DIVERSITY

Gatekeeper Systems is committed to making diversity, equity, and inclusion part of everything we do — including how we buy goods and services and the suppliers we partner with. We know that more diversity in our supply base means better products, more innovation, whilst driving competition and mitigating both country of manufacture & supply risk.

A diverse supplier is a business that is at least 51% owned and operated by an individual or group that is part of a traditionally underrepresented or underserved group. Gatekeeper Systems welcomes working with small-business enterprises (SBEs), minority-owned enterprises (MBEs), and woman-owned enterprises (WBEs), LGBTQ, veterans, and proprietors with disabilities.

4. CONFLICT MINERALS

Conflict minerals refers to gold, tantalum, tungsten, tin and other metallic minerals mined in conflict areas controlled by non-governmental military groups or unlawful military factions in the Democratic Republic of the Congo. The illegal mining profits obtained by these local military groups are stolen from citizens, causing human rights violations and environmental degradation in eastern Democratic Republic of the Congo. The origins of such minerals include the prohibited countries of origin defined in the Dodd-Frank Wall Street Reform and Consumer Protection Act, passed in 2010, namely the Democratic Republic of the Congo and the nine countries with which it shares internationally recognized borders, which are Angola, Burundi, the Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.

Gatekeeper Systems supports the efforts of human rights organizations to end violence and atrocities in conflict affected and high-risk areas. We work with our supply chain to positively influence ethical behavior through the application of a conflict-free sourcing process. We check a list of mineral sourcing partners, to ensure that our products and components originate from conflict-free smelters for gold, tungsten, tantalum, and tin.

Based on corporate social responsibility and respect for international human rights, Gatekeeper Systems does not accept metals from conflict-affected mining areas.

5. HEALTH AND SAFETY

Suppliers will integrate the following health and safety management requirements into business processes to provide workers with a healthy and safe work environment:

- **5.1 Occupational Safety and Health.** Suppliers will comply with all applicable safety and health laws and regulations, and identify, evaluate, and control worker exposure to safety and health hazards, including chemical, biological, physical, and ergonomic stressors, through proper design, engineering controls, maintenance, safe work procedures, and ongoing health and safety guidance. Where these means cannot adequately control hazards, suppliers will protect workers with appropriate personal protective



equipment and provide them with information about risks to them from these hazards. Suppliers will implement procedures to prevent, manage, track, and report occupational injury and illness, including encouraging worker reporting, classifying and recording cases, providing medical treatment, investigating cases, implementing corrective actions, and facilitating workers' return to work.

- **5.2 Emergency Preparedness.** Suppliers will identify and plan for potential emergencies and will implement emergency plans and provide guidance to workers on emergency response procedures, including emergency reporting, worker notification and evacuation, drills, fire detection and suppression equipment, exit facilities, and recovery plans.

6. ETHICS AND COMPLIANCE

Suppliers will uphold the highest standards of ethics to promote honesty and integrity in business operations, including:

- **6.1 Business Integrity.** Suppliers will avoid even the appearance of conflicts of interest in their work with us and will immediately disclose any known family or other close personal relationships with our employees who have an influence over their engagements with us. If suppliers extend any business courtesies to our employees, they will do so infrequently and the courtesies must be of no more than moderate value. Suppliers will also accurately reflect their business dealings in their books and records. Suppliers will not offer or accept any form of bribery, corruption, extortion, or embezzlement. Suppliers will not make illegal payments directly or indirectly. Suppliers will implement monitoring and enforcement procedures to ensure compliance with anti-corruption laws.
- **6.2 Intellectual Property.** Suppliers will respect intellectual property rights and will conduct technology and know-how transfers in a manner protecting intellectual property rights.
- **6.3 Responsible Materials Sourcing.** Suppliers will maintain a policy reasonably assuring that any tantalum, tin, tungsten, and gold in products they manufacture does not directly or indirectly benefit armed groups that commit human rights abuses in or near the Democratic Republic of the Congo. Suppliers will exercise, and will make available to us upon request, due diligence on the source and chain of custody of these minerals.
- **6.4 Privacy and Information Security.** Suppliers to comply with local regulations, to protect the privacy of personal information of everyone with whom they do business, including suppliers, customers, consumers, and workers.
- **6.5 Accessibility.** Suppliers will embed relevant accessibility standards, innovation, and best practices to deliver inclusive products and services for our users and stakeholders.
- **6.6 Corruption and Bribery.** Gatekeeper Systems is committed to conducting business with the utmost integrity and in compliance with all applicable laws and regulations. We strictly prohibit any form of corruption or bribery, including offering, soliciting, or accepting bribes, kickbacks, or other improper or unauthorized payments that directly or indirectly make, offer, or promise to make, kickbacks, benefits, or advantages to any person, individual, organization, or entity. Our employees are expected to maintain the highest standards of honesty, transparency, and ethical behavior in all business dealings. We will not engage in any activities that compromise the integrity of our organization, our employees, or our stakeholders. Any violation of this policy will result in disciplinary action, up to and including termination, and may also be subject to legal consequences.
- **6.7 Gifts, Gratuities and Business Courtesies.** Gatekeeper Systems is committed to competing solely on the merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by Gatekeeper Systems was sought, received or given in exchange



for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Gatekeeper Systems does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of Gatekeeper Systems or customers, or would cause embarrassment or reflect negatively on Gatekeeper Systems' reputation.

7. MANAGEMENT SYSTEM

Suppliers are expected to adopt or establish a management system to fulfill these responsibilities. The management system will be designed to ensure suppliers' operations: (a) comply with our requirements and applicable laws and regulations; (b) conform to these responsibilities; and (c) identify and mitigate operational risks related to these responsibilities. It should also facilitate continual improvement:

The management system should contain the following elements: executive level commitment and accountability; processes to identify, monitor, and comply with all applicable laws, regulations, standards, and requirements; risk management processes; communications and training for all workers and suppliers as determined by suppliers; ongoing assessments, monitoring, and continued improvement, including corrective action processes; a program that provides workers with a means to report grievances anonymously and without fear of retaliation, unless prohibited by law; and a program to ensure suppliers will continuously monitor these reporting processes, record issues raised, investigate as appropriate, and take appropriate action.

8. GRIEVANCE MECHANISM FOR CHILD LABOR AND/OR HUMAN TRAFFICKING

A grievance mechanism for suppliers concerning human trafficking and child labor is a vital tool in ensuring ethical supply chain practices. This mechanism allows suppliers, workers, and stakeholders to report incidents or suspicions of human trafficking and child labor confidentially and without fear of retaliation. Such mechanisms not only help in identifying and addressing violations but also demonstrate a company's commitment to upholding human rights and fostering a responsible and transparent supply chain. Below are the steps to report the grievance:

Identification of Grievance: Any individual (supplier, worker, or stakeholder) who suspects or witnesses incidents of human trafficking or child labor within the supply chain should gather relevant details and evidence to support their report.

File the Complaint: Submit a detailed complaint outlining the nature of the grievance, including specific incidents, individuals involved (if known), and any supporting evidence. Ensure the complaint is submitted through the prescribed channels to maintain confidentiality and facilitate proper handling. Alternatively report the grievance direct to Gatekeeper, by e-mailing ethics@gatekeepersystems.com

Confidentiality and Protection: The grievance mechanism guarantees confidentiality for the reporter and protection against any form of retaliation. Information provided will be handled discreetly and only shared with relevant personnel involved in the investigation and resolution process.

Investigation and Response: Upon receiving the complaint, the company will initiate a prompt and impartial investigation. This may involve gathering additional information, interviewing relevant parties, and assessing the credibility of the complaint.



Resolution and Remediation: Once the investigation is complete, the company will communicate the findings to the reporter and take appropriate action based on the severity and validity of the grievance. Actions may include remediation measures, disciplinary actions against perpetrators, and systemic improvements to prevent future occurrences.

By following these steps, the grievance mechanism ensures transparency, accountability, and a commitment to ethical practices within the supply chain regarding human trafficking and child labor concerns.

.....

On behalf of the supplier and as an authorize representative of the company, we acknowledge Gatekeeper Systems Supplier Code of Conduct:

ADKNOWLEDGMENT TO GATEKEEPER SYSTEMS SUPPLIER CODE OF CONDUCT	
Supplier's company name	
Address	
Print your name	
Your signature	
Your title	
Date	

Once **YELLOW highlight** has been populated, scan and e-mail the PDF to your Gatekeeper Systems supply chain contact. Save the file using following format : Supplier name / Date (MM/DD/YY)

In addition to the above we encourage you to confirm a yes / no response to questions 1 thru 16 on page 6 & 7:

	Are you a business that is at least 51% owned and operated by an individual or group that is	Please populate this section with a Yes or No response
1	A minority-owned enterprises (MBEs)	
2	A woman-owned enterprises (WBEs)	
3	An LGBTQ-owned enterprises	
4	A veteran-owned enterprises	



Conflict Minerals		Please populate this section with a Yes, No or N/A
5	If you use tin, tantalum, tungsten, or gold in the products manufactured for Gatekeeper Systems Inc, are they procured from countries outside of the DRC (Democratic Republic of the Congo)	

	Standards & Certifications	Does your company have any of the following certifications?	Please populate this section with a Yes or No response
6	ISO 9001	Quality management system	
7	ISO 14001	Environmental management system	
8	ISO 31000	Risk Management	
9	ISO 50001	Energy Performance	
10	ISO 26000	Social Responsibility	
11	ISO 45001	Health & safety	
12	IATF 16949	Automotive QMS	
13	LEED	Leadership in Energy & Environmental Design	
14	B CORP	Social & environmental performance	
15	SEDEX	Social audit	
16	Green Business Bureau	Green and social initiatives	