



# ATP Electronic, Inc

## Supplier Ethical Commitment

Supplier shall ensure that its employees, subcontractors, agents, and third parties assigned to provide services or products to ATP Electronics, Inc (ATP) act consistently with this Supplier Ethics Policy. ATP may audit Supplier and inspect Supplier's facilities to confirm compliance with this Policy. ATP may require Supplier to immediately remove any Supplier employee or representative that acts inconsistently with this or any other ATP policy. Failure to adhere to this Policy will result in disqualification from consideration for future business with ATP and may result in termination of existing business. Supplier may contact ATP's Ethics Office at [ethics@tw.atpinc.com](mailto:ethics@tw.atpinc.com) for questions relating to its obligations under this Policy.

### **Compliance with applicable law and ATP policies**

Supplier shall comply with all laws, regulations, and policies applicable to it and its dealings with ATP, including employment laws prohibiting discrimination and harassment. If this Policy or any other applicable ATP policy conflicts with applicable law, applicable law will govern such conflict to the extent it is impossible for Supplier to comply with both the law and the policy. If this Policy conflicts with any other applicable ATP policy, this Policy will govern to the extent it is impossible for Supplier to comply with both policies.

### **Insider trading**

Laws prohibit trading in securities by anyone with material information not available to the public. Supplier's interactions with ATP may result in Supplier having access to material, nonpublic information about ATP or another company (including ATP's customers, suppliers, and other business partners). Supplier shall not engage in any action to take advantage of that information, including buying or selling ATP's or that company's securities or sharing that information with others.

### **Gifts, travel, and entertainment**

Supplier shall not directly or indirectly provide any gift, travel, entertainment, political contribution, or charitable donation of any value to an ATP employee or any third party on behalf of ATP. Supplier may offer an ATP employee a gift, travel, or entertainment only if it is: (a) appropriate (no cash or cash equivalents or other excluded gift type), does not create an actual impropriety or a perception of impropriety, and complies with all laws, regulations, and policies for all parties), (b) of reasonable value, and (c) with full transparency of its value.

### **Unfair business practices**

ATP is committed to competing fairly and in compliance with the antitrust and competition laws in every country where it does business. Supplier shall comply with all applicable fair business, advertising, and antitrust competition laws; Supplier shall not fix prices, rig bids, allocate customers or markets, or exchange current, recent, or future pricing information with Supplier's competitors.

### **Anti-corruption**

ATP is committed to doing business with integrity and in compliance with the highest anti-corruption standards. Corruption violates the public's trust, threatens economic and social development, and hurts fair trade. Supplier shall comply with local laws and all similar anticorruption and bribery laws in other countries, and ATP's related policy. Supplier shall not engage or attempt to engage in bribery, extortion, or embezzlement. Supplier shall

conduct itself with honesty, fairness, and high ethical standards, avoiding even the appearance of impropriety in all its business interactions worldwide.

**Intellectual property rights, privacy, and data protection**

Supplier shall comply with all applicable intellectual property rights and laws. Supplier shall only use information technology and software that it has acquired or licensed legitimately and shall use them only in accordance with the terms of such licenses. Supplier shall not transfer any of ATP's technology, proprietary information, or trade secrets without prior written consent from ATP's Legal Department. Supplier shall respect the reasonable privacy and confidentiality expectations of everyone with whom it does business and shall appropriately protect all data that may come into its possession because of its relationship with ATP, including data relating to ATP and ATP's employees, customers, and partners. Supplier shall comply with ATP's instructions and with applicable privacy, data protection, and security laws and regulations when personal, confidential, proprietary, or other sensitive information is collected, stored, processed, transmitted, or shared. Supplier shall use ATP-provided information technology and systems only for business-related purposes authorized by ATP.