

Supplier Code of Conduct

STE iDirect, Inc. and its Affiliates (“STE iDirect”) has operated with high ethical business standards and integrity for more than 27 years. To preserve the trust placed in us, we count on our network of Suppliers and business partners across the globe to commit to and uphold our high standards of integrity, values and operating principles.

Our Supplier Code of Conduct (the “Supplier Code”), as may be amended from time to time, outlines STE iDirect’s expectations and guidelines with respect to responsible sourcing including our commitments to human rights, the environment, health and safety, business ethics and the development of a diverse and sustainable supply chain. The Code is aligned with the International Bill of Human Rights, The UN Guiding Principles on Business and Human Rights (UNGPs) and the Ten Principles of the UN Global Compact.

We require all Suppliers and business partners to comply with this Supplier Code. “Suppliers” refers to any third party that provides goods or services to STE iDirect for compensation, including, but not limited to, our direct and indirect Suppliers, co-manufacturers, co-packers, labor providers, logistic providers, distributors, and licensees, including their parent, subsidiary, or affiliate entities. Sub-contractors of Suppliers are also expected to adhere to the Supplier Code.

We require our Suppliers to abide by all applicable national, state, and local laws/regulations in the markets where they operate, however, where local laws or

standards differ from this Supplier Code, we expect our Suppliers to comply with the more stringent standards and principles.

ST Engineering iDirect is committed to working with and supporting our Suppliers to meet, and when possible, exceed, the requirements in this Supplier Code.

By its acceptance of any purchase order from STE iDirect, the Supplier acknowledges its acceptance of the Supplier Code and intention to comply with its requirements.

Forced Labor and Human Trafficking

ST Engineering iDirect does not tolerate any form of abusive or illegal labor in our supply chain such as forced labor or human trafficking. We encourage STE iDirect requires that all labor in its supply chain be voluntary and that workers are allowed freedom of movement. All forms of forced labor and human trafficking are prohibited including but not limited to any form of prison, slave, bonded or forced indentured labor. The recruitment, transportation, transfer, harboring or receipt of any persons, by means of threat or use of force, coercion or other means, for the purpose of exploiting them is prohibited. In advance of employment, workers are provided accurate and understandable information about the basic terms of their employment clearly stating their rights and responsibilities, information on wages, and hours and holidays. Workers are free to leave work and terminate their employment upon reasonable notice without penalty and employers must not retain any personal identification, travel documents or wages as conditions of employment. Job seekers and current employees are not charged or required to pay fees or deposits in order to gain or maintain their employment.

To the Extent applicable, we expect our suppliers to adhere to the UK Modern Slavery Act <https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>.

Child Labor

STE iDirect follows a 'zero tolerance to child labor' policy in our business operations worldwide. Our efforts to fight child labor are consistent with the International Labor Organization's (ILO) core labor standards and the United Nations Global Compact principles. We expect our Suppliers to prevent child labor in their operations and encourage our Suppliers to participate in industry efforts aimed at the elimination of such practices wherever they exist in the supply chain.

No individuals are hired under 15 years of age, or 14 years of age where local law allows, and such exception is consistent with the ILO Convention No. 138 and 182, or under the legal minimum age for employment in the country, whichever is greater.

Any employment of workers under the age of 18 does not interfere with schooling or vocational education or expose children to risks that can harm physical, mental or emotional development.

Human Trafficking

We expect our Suppliers to adhere to regulations prohibiting human trafficking and comply with all applicable local laws in the country or countries in which they operate. Suppliers must refrain from violating the rights of others and address any adverse human rights impact of their operations. Suppliers must educate employees on prohibited trafficking activities and provide avenues for raising issues or concerns about human trafficking without fear of retaliation.

Working Conditions

We expect our Suppliers to practice mutual trust and respect in the workplace and provide a workplace free of rude, disrespectful, discriminatory, or harassing behavior. We expect our Suppliers to ensure that all employment actions – including hiring, payment, benefits, training opportunities, advancement, discipline, termination, and retirement – are based on skills and job performance, and not on employees' personal characteristics or beliefs.

Fair Pay and Benefits

We expect our Suppliers to pay at least the minimum wage and provide any benefits required by law and/or contract. Working hours must not exceed legal limits. Wages and benefits are paid on time and at least equal to the applicable legal minimum wage and any associated statutory benefits. All use of temporary and outsourced labor shall be within the limits of the local law.

Non-Discrimination

Our Suppliers shall provide equal employment opportunity to employees and applicants for employment, without regard to race, ethnicity, religion, color, sex, national origin, age, military veteran status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information, or mental or physical disability, so long as employees are able to competently perform the essential functions of their job, with or without reasonable accommodation.

Anti-Harassment and Abuse

Suppliers shall ensure that their employees are afforded an employment environment that is free from physical, psychological, sexual and verbal harassment or other abusive conduct.

Collective Bargaining

Suppliers must permit employees to independently choose whether to join a trade union or

to participate in union activities, without supplier interference. Suppliers are expected to respect employee's choices, and to comply with applicable processes and laws on collective representation, bargaining, and consultation.

Substance Abuse

Suppliers shall maintain a workplace free from illegal use, possession, sale, or distribution of controlled substances.

Security

STE iDirect's Suppliers must protect worker's health by providing a safe workplace and appropriate security measures.

Anti-Corruption and Ethical Conduct

Our Suppliers shall conduct appropriate levels of due diligence to prevent and detect corruption in all business arrangements, including their own supply-chain relationships, partnerships, joint ventures, offset agreements, and the hiring of consultants. Our Suppliers must comply with the anti-corruption laws, directives and/or regulations that govern operations in the countries in which they do business and not engage in any form of corrupt practices, including but not limited to extortion, fraud, or bribery.

The receipt, payment, and/or promise of monies or anything of value, directly or indirectly, intended to exert undue influence or to gain improper advantage is prohibited under this Supplier Code. Our Suppliers must not offer any payments to, or receive any payments from, any government official, political party, candidate for public office, customer, supplier, agent, representative or others.

This prohibition against improper payments applies even in locations where such payments are commonplace and do not violate local law.

Gifts & Hospitality

The exchange of business courtesies may not be used to gain an unfair competitive advantage. In any business relationship, our Suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulations, and that these exchanges do not violate the rules and standards of the recipient's organization, and are consistent with reasonable marketplace customs and practices.

Conflicts of Interest, Competitive Behavior, & Anti-Trust

Our Suppliers shall avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with STE iDirect. Our Suppliers shall provide notification to all affected parties in the event that an actual or potential conflict of interest arises (this includes a conflict between the interests of our company and a Supplier's personal interests or those of close relatives, friends or other associates). In

addition, we expect our Suppliers to deal fairly with their customers, suppliers, competitors and employees, avoiding taking unfair advantage of such parties through manipulation, concealment or misuse of information or misrepresenting material facts.

Anti-Trust

Our Suppliers must not fix prices or coordinate market conduct with competitors or their own Suppliers in a way that improperly restricts competition. They must not exchange current, recent, or future pricing information with competitors. Our Suppliers must refrain from participating in a cartel or any kind of association or arrangement that affects competition in a manner not allowed by the applicable laws and regulations.

Insider Trading

Our Suppliers and their personnel must not use material, non-public information obtained in the course of their work with STE iDirect as the basis for stock trading or to enable others to trade on inside information.

Counterfeit Parts

Our Suppliers shall develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, to exclude them from the delivered product, and to provide notification to recipients of counterfeit products when warranted.

Accurate Books & Records

We expect Suppliers to create and maintain complete and accurate business transaction records, in accordance with applicable laws and contract terms, and to prevent alteration, concealment, or misrepresentation of those 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. Upon request, all records of STE iDirect transactions must be made available to STE iDirect for review and audit.

Information Protection

Suppliers must protect the confidential and proprietary information of others, including personal information, from unauthorized access, use, modification, disclosure, or destruction through appropriate physical and electronic security procedures. Supplier shall comply, to the extent applicable, with data protection laws, including but not limited to the General Data Protection Regulation (EU) 2016/679 ("GDPR") of the European Parliament and of the Council, and any implementation thereof in national law. Supplier will collect, store, and use Personal Data (as defined in Article 4(1) of the GDPR) of iDirect consistent with applicable law and Supplier's privacy policy, if applicable. Supplier, its affiliates,

vendors, subcontractors, or agents will process Personal Data in accordance with applicable data privacy laws.

Confidential/Proprietary information

Suppliers shall properly handle sensitive information, including confidential, proprietary, and personal information. Information should not be used for any purpose other than the business purpose for which it was provided.

Intellectual Property

Our Suppliers shall respect and comply with all the laws governing intellectual property rights, including intellectual property designated as a trade secret, as confidential, or that is subject to patents, copyrights, or trademarks restrictions.

Global Trade Compliance

Suppliers shall comply with all applicable laws, directives, and regulations governing the import, export, re-export and transfer of goods, technical data, software and services. Suppliers shall provide truthful and accurate information and obtain export licenses and/or consents where necessary.

Quality

Suppliers must take due care to ensure their work product meets STE iDirect quality standards that can be found at <https://www.idirect.net/partner-resources/supplier-documents/>. We expect our Suppliers to have in place quality assurance processes to identify defects and implement corrective actions, and to facilitate the delivery of a product whose quality meets or exceeds specifications and/or contractual requirements. Where applicable, Suppliers are expected to flow down requirements to their supply chain.

Environment, Health & Safety

Our Suppliers shall operate in a manner that actively manages risk, conserves natural resources, and protects the environment. We expect our suppliers to apply environmental management system principles in order to establish a systematic approach to the management of risks/hazards and opportunities associated with the environment, including potential loss from regulatory non-compliance, reputational loss, and opportunities for business growth through operational and product stewardship.

Our Suppliers shall comply with all applicable environmental, health and safety laws, regulations, and directives. Suppliers should protect the health, safety, and welfare of their employees, visitors, and others who may be affected by their activities.

Conflict Minerals

Our Suppliers shall adhere to all applicable conflict minerals regulations. If a product contains one or more of the so-called conflict minerals (tin, tantalum, tungsten and gold or

their ores) we expect our suppliers to provide, on request, transparency on the supply chain up to the smelter.

Ethics Program

Commensurate with the size and nature of their business, we expect our Suppliers to have management systems in place to support compliance with laws, regulations, and the expectations of this Supplier Code of Conduct.

Ethics Policies

Our Suppliers shall have documented ethics and compliance policies, to implement their own code of conduct, and to flow down the principles of their code to their supply chain.

Non-Retaliation

We expect our Suppliers to provide their employees and contractors with avenues for raising legal or ethical issues or concerns without fear of retaliation. We expect our suppliers to take action to prevent, detect, and correct any retaliatory actions.

Asking Questions & Reporting Concerns

Suppliers shall report in good faith any potential ethical issue or violation by Supplier's employees. STE iDirect investigates each allegation thoroughly to determine the facts and the parties involved.

STE iDirect has multiple contact points to report concerns or address requests: Ethical issues or violations:

Local STE iDirect representatives

STE iDirect Quality

STE iDirect Security

Request for a waiver:

STE iDirect Supply Chain

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HOME

**IDIRECT
GOVERNMENT**

**PRIVACY
NOTICE**

**DO NOT SELL OR SHARE MY PERSONAL
INFORMATION**

**TERMS AND
CONDITIONS**

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