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Code of Conduct

Overview

At Anaheim Automation we are steadfast in our dedication to fostering a culture of integrity, responsibility, and ethical excellence. This Code of Conduct serves as a foundational pillar in our mission to ensure safe working conditions, uphold human rights, and promote environmental sustainability across all facets of our company. We are committed to conducting our business with the highest standards of ethics and responsibility, recognizing the profound impact our operations have on communities, individuals, and the planet. As such, this document outlines the principles and standards that guide our actions and decisions, ensuring that we, along with our suppliers and partners, contribute positively to society and the environment.

The Anaheim Automation Code of Conduct Covers these Areas:

1. [Labor](#)
2. [Health and Safety](#)
3. [Environment](#)
4. [Ethics](#)
5. [Management Systems](#)

1. LABOR

Anaheim Automation commits to respect human rights of workers, and to treat them with dignity. This applies to direct and indirect suppliers, as well as all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

The labor standards are as follows:

1.1 Prohibition of Forced Labor

Forced labor, including bonded, indentured, involuntary prison labor, slavery, or trafficking, is strictly prohibited. Workers must have freedom of movement and be provided with an employee handbook outlining employment terms. All work must be voluntary, with the right to resign given reasonable notice, and employers cannot retain personal documents or charge recruitment fees. If fees are paid by the worker, they must be reimbursed.

1.2 Young Workers

Child labor is strictly forbidden in manufacturing, applying to anyone under 15 or below the country's minimum employment age, whichever is highest. Workers under 18 are prohibited from hazardous work, including night shifts. Anaheim Automation commits to managing student workers responsibly, verifying workers' ages, and ensuring student programs comply with laws. Student, intern, and apprentice wages must match those of entry-level workers for similar tasks in the absence of local law. Remediation is provided if child labor is detected.

1.3 Working Hours

Working hours shall not exceed the maximum set by local law. Further, a workweek shall not be more than 50 hours per week, including overtime, except in emergency or unusual situations. All overtime shall be voluntary. Workers shall be allowed at least one day off every seven days.

1.4 Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. All workers shall receive equal pay for equal work and qualifications. Workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor shall be within the limits of the local law.

1.5 Non-Discrimination/Non-Harassment/Humane Treatment

Anaheim Automation shall commit to a workplace free of harassment and unlawful discrimination. There shall be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Companies shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers. Workers shall be provided with reasonable accommodation for religious practices and disability. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.

1.6 Freedom of Association and Collective Bargaining

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

2. HEALTH AND SAFETY

Anaheim Automation recognizes that in addition to minimizing the incidence of work-related injuries and illnesses, a safe and healthy working environment enhances the quality of products and services, consistency of production and worker retention and morale. Anaheim Automation also recognizes that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace.

The health and safety standards are as follows:

2.1 Occupational Health and Safety

Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) shall be identified and assessed and addressed by management. Where hazards cannot be adequately controlled by these means, workers shall be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Gender-responsive measures shall be taken, such as not having pregnant women and nursing mothers in working conditions, which could be hazardous to them or their child and to provide reasonable accommodations for nursing mothers.

2.2 Emergency Preparedness

Potential emergency situations and events shall be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Emergency plans shall also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.

2.3 Occupational Injury and Illness

Procedures and systems shall be in place to prevent, manage, track and report occupational injuries and illnesses, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work. Anaheim Automation shall allow workers to remove themselves from imminent harm, and not return until the situation is mitigated, without fear of retaliation.

2.4 Industrial Hygiene

Worker exposure to chemical, biological, and physical agents shall be identified, evaluated, and controlled. When hazards cannot be adequately controlled, workers shall be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Anaheim Automation shall provide workers with safe and healthy working environments, which shall be maintained through ongoing, systematic monitoring of workers' health and working environments. Anaheim Automation shall provide occupational health monitoring to routinely evaluate if workers' health is being harmed from occupational exposures. Protective occupational health programs shall be

ongoing and include educational materials about the risks associated with exposure to workplace hazards.

2.5 Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks shall be identified, evaluated, and controlled.

2.6 Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers shall be provided and properly maintained where machinery presents an injury hazard to workers.

2.7 Sanitation

Workers shall be provided with ready access to clean toilet facilities, potable water, storage, and eating facilities.

2.8 Health and Safety Communication

Anaheim Automation shall provide workers with appropriate workplace health and safety information and training for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Health information and training shall include content on specific risks to relevant demographics, such as gender and age, if applicable. Training shall be provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.

3. ENVIRONMENT

Across all business functions, Anaheim Automation recognizes that environmental responsibility is integral to producing world-class products. Anaheim Automation shall identify the environmental impacts and minimize adverse effects on the community, environment, and natural resources, while safeguarding the health and safety of the public.

The environmental standards are as follows:

3.1 Environmental Permits and Reporting

All required environmental permits approvals, and registrations shall be obtained, maintained, and kept current, and their operational and reporting requirements shall be followed.

3.2 Pollution Prevention and Resource Conservation

Emissions and discharges of pollutants and generation of waste shall be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, shall be conserved by practices such as

modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

3.3 Hazardous Substances

Chemicals, waste, and other materials posing a hazard to humans, or the environment shall be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

3.4 Solid Waste

Anaheim Automation shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle non-hazardous solid waste.

3.5 Materials Restrictions

Anaheim Automation shall adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

3.6 Water Management

Anaheim Automation shall seek opportunities to conserve water. Anaheim Automation shall follow all local laws and regulations regarding water use and disposal.

3.7 Energy Consumption and Greenhouse Gas Emissions

Anaheim Automation shall look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

4. ETHICS

To meet social responsibilities and to achieve success in the marketplace, Anaheim Automation shall uphold the highest standards of ethics including the following:

4.1 Business Integrity

The highest standards of integrity shall be upheld in all business interactions. Anaheim Automation shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

4.2 No Improper Advantage

Bribes or other means of obtaining undue or improper advantage shall not be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything above nominal value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anticorruption laws.

4.3 Disclosure of Information

All business dealings shall be transparently performed and accurately reflected on the Anaheim Automation's business books and records. Information regarding participant's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance shall be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

4.4 Intellectual Property

Intellectual property rights shall be respected. The transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information shall be safeguarded.

4.5 Fair Business, Advertising and Competition

Standards of fair business, advertising, and competition shall be upheld.

4.6 Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers shall be maintained, unless prohibited by law. Anaheim Automation shall have a written process in the employee handbook for their personnel to be able to raise any concerns without fear of retaliation.

4.7 Responsible Sourcing of Minerals

Anaheim Automation is committed to supporting responsible sourcing practices. We share the same expectation with all our stakeholders. Anaheim Automation conducts risk mitigation and due diligence appropriate to the nature of the risks as it pertains to our products, suppliers, or services.

4.8 Privacy

Anaheim Automation shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Anaheim Automation shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

5. MANAGEMENT SYSTEMS

Anaheim Automation shall adopt or establish a management system with a scope that is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the Anaheim Automation's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It shall also facilitate continual improvement.

The management system shall contain the following elements:

5.1 Company Commitment

Anaheim Automation has an employee handbook that addresses human rights, health and safety, environmental and ethics policy statements affirming Anaheim Automation's commitment to due diligence and continual improvement, endorsed by executive management. The Employee Handbook is given to all employees and made readily available for additional copies to be distributed.

5.2 Management Accountability and Responsibility

Anaheim Automation has clearly identified management responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis.

5.3 Legal and Customer Requirements

Anaheim Automation has established a process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.

5.4 Risk Assessment and Risk Management

Anaheim Automation has established a process to identify the legal compliance, environmental, health and safety, labor practice and ethics risks, including the risks of severe human rights and environmental impacts, associated with Anaheim Automation's operations. Anaheim Automation shall determine the relative significance for each risk and implement appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

5.5 Training

Anaheim Automation has established programs for training managers and workers to implement policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.

5.6 Communication

Anaheim Automation has established processes for communicating clear and accurate information about its policies, practices, expectations, and performance to workers, suppliers, and customers.

5.7 Worker/Stakeholder Engagement and Access to Remedy

Anaheim Automation has established processes for ongoing two-way communication with workers, their representatives, and other stakeholders where relevant or necessary. The process shall aim to obtain feedback on operational practices and conditions covered by this Code, and to foster continuous improvement. Workers shall be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

5.8 Audits and Assessments

Anaheim Automation conducts self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.

5.9 Corrective Action Process

Anaheim Automation has established a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

5.10 Documentation and Records

Anaheim Automation maintains documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

DOCUMENT HISTORY

Version 1.0 – Released 2/23/2024