



# LTD Code of Conduct

All LTD Suppliers are expected to comply to the same or equivalent to the current RBA standard

# Overview

- ▶ LTD is built on principles of fair dealing and ethical conduct in conducting its business operations.
- ▶ Careful observance of and adherence to applicable laws and regulations is critical to business success.
- ▶ This requires high standards of personal conduct and integrity from employees.
- ▶ Employees are responsible for knowing the policy and complying to the standards.
- ▶ The Policy is divided into 5 sections:
  - ▶ Business Ethics
  - ▶ Labor Relations
  - ▶ Health and Safety
  - ▶ Environmental
  - ▶ Reporting Procedures

# Business Ethics

- ▶ LTD maintains high standards for ethical behavior in business transactions. Any activity intended to obtain unfair advantage, such as bribery or other types of corruption, is strictly prohibited.
- ▶ All business activities and documentation are transparent and are properly reported per local, state and federal regulations.
- ▶ LTD protects and safeguards its intellectual property, employee data, and customer and supplier data and information from improper disclosure and use. All actions involving this type of data are conducted with utmost security.
- ▶ Employees are responsible for protecting the Company's reputation, revenues and assets.

# Labor Relations

- ▶ Employees are hired “at will”.
- ▶ Must be 18 years of age at employment.
- ▶ All Harassment and/or the threat of harassment including sexual, mental, and physical is strictly prohibited.
- ▶ All forms of discrimination are prohibited: race, color, age, gender, sexual orientation, gender identity, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, veteran status and protected genetic information. Employment decisions based on merits, qualifications and performance.
- ▶ Employee workweeks will not exceed 60 hours except in an emergency or other unusual circumstance.

# Labor Relations

- ▶ Wages comply with all legally mandated requirements, such as federal taxes and workers compensation.
- ▶ Employees are not prohibited from their rights under the National Labor Relations Act.

# Health and Safety

- ▶ Compliance with all OSHA mandated safety requirements.
- ▶ LTD provides a workplace free of hazards, including chemical exposure, machine, material and product handling by adhering to policies, procedures and actions to reduce employee risk.
- ▶ LTD maintains a risk mitigation plan for various types of emergency situations. Preparations focus on minimizing risks to employees, visitors, environment and property.
- ▶ Per OSHA regulations, employees have access to all chemical labels and handling.
- ▶ All employees are provided workers compensation insurance in the event of injury on the job.

# Health and Safety

- ▶ Employees receive training on safety procedures for their work area and emergency situations.
- ▶ LTD conducts EHS audits to monitor, assess and maintain the environmental health and safety requirements.

# Environmental

- ▶ LTD promotes responsibility for the environment by maintaining proper permits, reporting and registrations.
- ▶ LTD complies with federal, state and local requirements for air emissions, water management, solid waste and chemical disposal.
- ▶ Employees are trained on proper procedures to protect the environment.
- ▶ Hazardous chemicals are labelled, handled and stored to avoid exposure to employees and the environment.



# Reporting Procedures

- ▶ Employee actions and responsibilities:
  - ▶ Understand the policies and procedures for the Company and their work area
  - ▶ Consult with Management before taking any action that an employee believes may violate any part of the Business Ethics and Conduct Policy
  - ▶ Report suspected violations to Management or Human Resources as soon as possible
- ▶ All complaints and reports will be addressed as quickly and confidentially as possible.
- ▶ Immediate action will be taken to address and correct the issue.
- ▶ Company policy prohibits retaliation against employees who report suspected violations in good faith.