

Code of Conduct

TITLE: Code of Conduct
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Signature Authority

Title	Name	Signature	Date
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Purchasing Manager	Alvin Butler		
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- 1.0 Purpose and Scope
 - 1.1 To define a policy reflecting the basic tenets of responsible manufacturing, agreed upon by the electronics industry, that defines a standard on social, environmental, and ethical issues.
 - 1.2 This policy applies for all DDH employees. We expect the same commitments from all of our suppliers, subcontractors and other business partners.

- 2.0 Associated Documents
 - 2.1 EICC Code of Conduct – <http://www.eiccoalition.org/standards/code-of-conduct/>
 - 2.2 DDH-2071 Whistleblower Policy
 - 2.3 DDH-2070 Anti-Bribery and Anti-Corruption Policy
 - 2.4 DDH-2058 DDH Enterprise, Inc. Conflict Minerals Policy
 - 2.5 DDH-2051 Environmental Policy
 - 2.6 [California Child Labor Law Pamphlet](#)

- 3.0 Policy
 - 3.1 It is the policy of DDH to operate our business and manufacturing operations in accordance with, and in ways that promote internationally-recognized standards of corporate responsibility.
 - 3.2 In addition to complying with all legal requirements, which we view as our minimum responsibility, we are committed to ensuring that:
 - 3.2.1 working conditions in our facility are safe,
 - 3.2.2 all employees are treated with respect and dignity,
 - 3.2.3 all operations are environmentally responsible, and

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- 3.2.4 our company is directed and managed according to the highest standards of corporate governance and business ethics.
- 3.3 We are also committed to being leading and respected members of our communities, and to advocating for public policies that are in our business interests and that help us grow responsibly. The standards below reflect these commitments and comprise our Corporate Responsibility Policy.
- 3.4 While not a member of the EICC (Electronics Industry Citizenship Coalition), DDH supports and complies with the EICC Code of Conduct and we are firmly committed to achieving the organization's high standards in our operations as well as in our supply chain.

4.0 Code of Conduct

4.1 The EICC Code of Conduct contains provisions to address performance in the following areas:

Labor	
<ul style="list-style-type: none"> • Freely Chosen Employment • Young Workers • Working Hours • Wages and Benefits 	<ul style="list-style-type: none"> • Humane Treatment • Non-Discrimination • Freedom of Association
Health & Safety	
<ul style="list-style-type: none"> • Occupational Safety • Emergency Preparedness • Occupational Injury and Illness • Industrial Hygiene 	<ul style="list-style-type: none"> • Physically Demanding Work • Machine Safeguarding • Sanitation, Food, and Housing • Health and Safety Communication
Environment	
<ul style="list-style-type: none"> • Environmental Permits and Reporting • Pollution Prevention and Resource Reduction • Hazardous Substances • Wastewater and Solid Waste 	<ul style="list-style-type: none"> • Air Emissions • Materials Restrictions • Storm Water Management • Energy Consumption and Greenhouse Gas Emissions
Ethics	
<ul style="list-style-type: none"> • Business Integrity • No Improper Advantage • Disclosure of Information • Intellectual Property 	<ul style="list-style-type: none"> • Fair Business, Advertising and Competition • Protection of Identity and Non-Retaliation • Responsible Sourcing of Minerals • Privacy
Management Systems	
<ul style="list-style-type: none"> • Company Commitment • Management Accountability and Responsibility • Legal and Customer Requirements • Risk Assessment and Risk Management • Improvement Objectives • Training 	<ul style="list-style-type: none"> • Communication • Worker Feedback and Participation • Audits and Assessments • Corrective Action Process • Documentation and Records • Supplier Responsibility

4.2 Labor

- 4.2.1 DDH is committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.
- 4.2.2 Freely Chosen Employment – Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities. As part of the hiring process, workers will be provided with documentation in compliance with the labor laws of the State of California. All work is voluntary,

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- “at will”, and workers shall be free to leave work at any time or terminate their employment. DDH and its agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law. Workers shall not be required to pay DDH’s or agents’ recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.
- 4.2.3 Young Workers – Child labor is not to be used in any stage of manufacturing. The term “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the State of California, whichever is greatest. DDH may choose the use of legitimate workplace learning programs, which comply with all laws and regulations. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. DDH shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students’ rights in accordance with applicable law and regulations. DDH shall provide appropriate support and training to all student workers. The wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. (Reference [California Child Labor Law Pamphlet](#))
- 4.2.4 Working Hours - Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Workweeks will not exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers are allowed at least one day off every seven days.
- 4.2.5 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. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure are not 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 will be within the limits of the local law.
- 4.2.6 Humane Treatment – There shall be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.
- 4.2.7 Non-Discrimination – DDH is committed to a workforce free of harassment and unlawful discrimination. The company shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers will not be subjected to medical tests or physical exams that could be used in a discriminatory way.
- 4.2.8 Freedom of Association – In conformance with local law, DDH shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. 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.
- 4.3 Health and Safety
- 4.3.1 DDH recognizes that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. DDH also recognizes that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

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- 4.3.2 Occupational Safety – Worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Workers shall be encouraged to raise safety concerns.
 - 4.3.3 Emergency Preparedness – Potential emergency situations and events are to 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, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property.
 - 4.3.4 Occupational Injury and Illness – Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness 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 return of workers to work.
 - 4.3.5 Industrial Hygiene – Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. Engineering or administrative controls must be used to control overexposures. When hazards cannot be adequately controlled by such means, worker health is to be protected by appropriate personal protective equipment programs.
 - 4.3.6 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 is to be identified, evaluated and controlled.
 - 4.3.7 Machine Safeguarding – Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.
 - 4.3.8 Sanitation, Food, and Housing – Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. DDH does not provide housing.
 - 4.3.9 Health and Safety communication – DDH shall provide workers with appropriate workplace health and safety training in their primary language, in accordance with Cal-OSHA requirements. Health and safety related information shall be clearly posted in the facility.
- 4.4 Environmental
- 4.4.1 DDH recognizes that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public.
 - 4.4.2 Environmental Permits and Reporting – All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.
 - 4.4.3 Pollution Prevention and Resource Reduction – The use of resources and generation of waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.
 - 4.4.4 Hazardous Substances – Chemicals and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.
 - 4.4.5 Wastewater and Solid Waste – DDH shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Wastewater generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated as required prior to discharge or disposal. In addition, measures

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- should be implemented to reduce generation of wastewater. DDH shall conduct routine monitoring, as applicable, of the performance of its wastewater treatment systems.
- 4.4.6 Air Emissions – Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge. DDH shall conduct routine monitoring, as applicable, of the performance of its air emission control systems.
 - 4.4.7 Materials Restrictions – DDH shall adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.
 - 4.4.8 Storm Water Management – DDH shall implement a systematic approach to prevent contamination of storm water runoff. DDH shall prevent illegal discharges and spills from entering storm drains.
 - 4.4.9 Energy Consumption and Greenhouse Gas Emissions – Energy consumption and greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level. DDH will look for cost- effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.
- 4.5 Ethics
- 4.5.1 To meet social responsibilities and to achieve success in the marketplace, DDH and its agents are to uphold the highest standards of ethics.
 - 4.5.2 Business Integrity – The highest standards of integrity are to be upheld in all business interactions. DDH shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. All business dealings should be transparently performed and accurately reflected on DDH's business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws. (Reference DDH-2070 Anti-Bribery and Anti-Corruption Policy)
 - 4.5.3 No Improper Advantage – Bribes other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of 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.
 - 4.5.4 Disclosure of Information – Information regarding DDH labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable State and Federal regulations and prevailing industry practices. Falsification of records or misrepresentations of conditions or practices in the supply chain are unacceptable.
 - 4.5.5 Intellectual Property – Intellectual property rights are to be respected; transfer of technology and know- how is to be done in a manner that protects intellectual property rights; and, customer information is to be safeguarded.
 - 4.5.6 Fair Business, Advertising and Competition – Standards of fair business, advertising and competition are to be upheld. Appropriate means to safeguard customer information must be available.
 - 4.5.7 Protection of Identity and Non-Retaliation – Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law. DDH should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation. (Reference DDH-2071 Whistleblower Policy)
 - 4.5.8 Responsible Sourcing of Minerals – DDH shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. DDH shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request. (Reference DDH-2058 Conflict Minerals Policy)

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- 4.5.9 Privacy – DDH commits to protecting the reasonable privacy expectations of personal information of everyone we do business with, including suppliers, customers, consumers and employees. DDH complies with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.
- 4.6 Management System
- 4.6.1 DDH has established a management system whose scope is related to the content of the EICC Code of Conduct and this Code. The management system is designed to ensure:
- 4.6.1.1 compliance with applicable laws, regulations and customer requirements related to the participant's operations and products;
 - 4.6.1.2 conformance with the EICC Code of Conduct; and
 - 4.6.1.3 Identification and mitigation of operational risks related to this Code of Conduct. It should also facilitate continual improvement.
- 4.6.2 The management system contains the following elements:
- 4.6.2.1 Company Commitment – DDH has established social and environmental responsibility policy statements affirming DDH's commitment to compliance and continual improvement endorsed by executive management and posted in the facility.
 - 4.6.2.2 Management Accountability and Responsibility – DDH clearly identifies senior executive and company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.
 - 4.6.2.3 Legal and Customer Requirements – A process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code
 - 4.6.2.4 Risk Assessment and Risk Management – A process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with DDH's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.
 - 4.6.2.5 Improvement Objectives – Written performance objectives, targets and implementation plans to improve the DDH's social and environmental performance, including a periodic assessment of DDH's performance in achieving those objectives.
 - 4.6.2.6 Training – Programs for training managers and workers to implement DDH's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.
 - 4.6.2.7 Communication – A process for communicating clear and accurate information about DDH's policies, practices, expectations and performance to workers, suppliers and customers.
 - 4.6.2.8 Worker Feedback and Participation – Ongoing processes to assess employees' understanding of and obtain feedback on practices and conditions covered by this Code and to foster continuous improvement.
 - 4.6.2.9 Audits and Assessments – Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the EICC Code of Conduct and customer contractual requirements related to social and environmental responsibility.
 - 4.6.2.10 Corrective Action Process – A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.
 - 4.6.2.11 Documentation and Records – Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.
 - 4.6.2.12 Supplier Responsibility – A process to communicate EICC Code of Conduct requirements to suppliers and to monitor supplier compliance to the Code.

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Revision History

REV.:	ITEM#:	SUMMARY OF CHANGES:	Date
A	All	New Release	11/28/17