

BRISTOL INSTRUMENTS, INC. Code of Conduct and Ethics Policy

Bristol Instruments is committed to being a responsible corporate citizen and treating everyone we work with, inclusive of employees, customers, vendors and those they associate with ethically. As part of that commitment, Bristol seeks to source products, components, and materials from companies that share its values around human rights, ethics, and environmental responsibility.

We commit in perpetuity to reaching our goals using only legal and ethical principles based in national and international laws, with the aim of protecting the rights of people and the health of the environment as a matter of normal operations.

This document is a summary referring to the “RBA Code of Conduct”¹, which contains information and our adopted requirements in detail. We require that our management team take full responsibility to implement, monitor and maintain a system of ethical business practices, policies and processes inclusive of the summarized points below, as well as assuring review, amendment and implementation within our workforce and operations. The management team is responsible to support a process that identifies risks and implements timely corrective actions relative to shortcoming in any of the items outlined below.

Employment Environment and Conditions:

We obey all laws prohibiting the use of forced labor, child labor, or any form of slavery including human trafficking. We follow all labor laws including:

- exhibiting zero tolerance for workplace discrimination or harassment of any type.
- following all applicable labor laws, including the rights of workers to engage in collective bargaining and to join unions.
- ensuring that our employees receive training in all of the above categories.
- holding all employees accountable regarding these principles and laws.

Workforce Health and Safety:

We provide a safe and healthy work environment. We strive to reduce, or eliminate, factors presenting risk to the wellbeing of our workforce including:

- obeying all laws, domestic and international, relative to workplace safety, hygiene and human factors.
- providing a safe, clean work environment in accordance with OSHA and local laws, as applicable.
- communicate to our workforce risks relative to health and safety, post all relevant safety information, provide safety equipment, training and countermeasures.

- support safety policies and procedures as a matter of normal operations

Environmental Responsibility:

We avoid and minimize negative environmental impacts from our operations, both direct and indirect, We:

- obey all laws, domestic and international, relative to environmental factors.
- limit, reduce and eliminate where possible, operational factors that harm the environment relative to pollution, resource usage or other environmental ill-effects.

Business Ethics:

We do not engage in any form of bribery, or in any knowingly unfair business practice. Even the perception of any type of unfair advantage or favoritism must be prevented. Payments, including gifts, favors or entertainment, are not to be used to attain an unfair advantage with vendors or customers. We strive to:

- obey all laws, domestic and international, prohibiting corruption and bribery.
- secure all customer personal data and intellectual property in accordance with non-disclosure agreements and any additional applicable laws.

Enforcement:

Non-compliant conditions found within our workforce will be corrected immediately, including termination of relationships with personnel, vendors or customers as suitable.

Conclusion:

Bristol Instruments strives to be a good corporate citizen and follows all applicable local, state, national, and where applicable, international laws. We endeavor to maintain all business dealings only in a responsible and ethical manner, only with ethical partners, inclusive of our workforce, vendors and customers. To this end, we participate in the RBA, and strive to follow the "RBA Code of Conduct".

¹ The Responsible Business Alliance (RBA) is a non-profit organization that facilitates and defines a standard for corporate responsibility, through a comprehensive code of conduct. Per the RBA quote "The RBA Code of Conduct is a set of social, environmental and ethical industry standards. The standards set out in the Code of Conduct reference international norms and standards including the Universal Declaration of Human Rights, ILO International Labor Standards, OECD Guidelines for Multinational Enterprises, ISO and SA standards, and many more. While the Code of Conduct originated with the electronics industry in mind, it is applicable to and used by many industries beyond electronics." Link to RBA Code of Conduct download area: <https://www.responsiblebusiness.org/code-of-conduct/>