

BRISTOL INSTRUMENTS, INC. Employment Fair Practices 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 operate with fair treatment for those we employ or intend to employ.

We commit in perpetuity to reaching our goals using only legal and ethical principles based on national and international laws, with the aim of protecting the well-being of our workforce.

This document is a summary referring to the "RBA Code of Conduct" 1, which contains information and our adopted requirements in further 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.

The requirements list below is not exhaustive of all employee, or employment candidate, entitlements; Employees and employment candidates retain all rights in accordance with statutory requirements within New York State, and the United States of America.

Employees, and employment candidates:

- must be eligible to legally work as defined by United States and New York State law, with all associated statutory conditions and checks being verified by the company prior to, and during, employment
- pay no fees for employment, interviews, placement, application, consideration, or any other similar cost; recruitment or placement fees, when applicable, are borne solely by the company
- retain full custody of their personal documents (identification, passport, etc), and if employed, have full access to their company employee file contents upon request to Human Resources
- must be a minimum of 18 years of age for employment eligibility; age eligibility is confirmed through governmentally approved identification and the employee's attestation on United States form I-9 "Employment Eligibility Verification" upon start of work
- receive employment offers, and subsequent information once employed, in a language they can understand; employment offers include conditions of employment, including pay clearly outlined, and are agreed upon in writing



- once employed, are at liberty to freely move in the facility and enter and exit as needed during work hours; employees are under no threat or constraint, physical or otherwise, beyond their voluntary decision to work to the agreed upon work role and schedule; employment candidates are chaperoned until employed, or discharged
- once employed, must conform to work hour limitations as defined in the employee handbook, with verification performed weekly by human resources personnel as part of payroll processing
- are entitled, at the very least, to the minimum wage as defined by New York State law
- when paid, are subject solely to legally defined and permissible pay withholding
- retain the right, as applicable, to collectively bargain by joining a labor organization or trade union, or other lawful association

Conclusion:

Bristol Instruments strives to be a good corporate citizen and follows all applicable local, state, national, and where applicable, international laws in respect to employment and hiring. 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/