

San-tron Social Responsibility Policy

It is San-tron's policy that in our facilities and supply chain; working conditions are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically.

Labor

1. All workers shall be employed voluntarily of their own free will. There shall be no forced, bonded or indentured labor of any kind. There shall not be unreasonable restrictions on workers' freedom of movement in the facility or unreasonable restrictions on entering or exiting company-provided facilities. Employers or agents may not hold, destroy, conceal, confiscate or deny access by employees to their identification or immigration documents, unless such holdings are required by law. Workers shall not be required to pay recruitment fees as a condition of their employment.
2. 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 country, whichever is greatest. Employers shall maintain documentation of the age of employees.
3. Workweeks are not to exceed the maximum set by local law or 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.
4. 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 shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement
5. There is to 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.
6. Employers shall not engage in harassment or discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, or marital status in hiring and employment practices such as wages, promotions, rewards and access to training. Workers shall have reasonable accommodation for religious practices.
7. In conformance with local law, workers shall have the rights to form and join trade unions, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers 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.

Health and Safety

1. 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, personal protective equipment and educational materials about risks to them associated with these hazards. Workers are encouraged to raise safety concerns.

2. Emergency plans and response procedures shall be identified for potential emergency situations and events including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.
3. Employers shall prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; assure necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.
4. Worker exposure to chemical, biological and physical agents shall 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.
5. 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.
6. Production and other machinery shall have physical guards, interlocks and barriers that are properly maintained where the machinery presents an injury hazard to workers.
7. Workers shall be provided with access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by employers or labor agents are to be clean and safe, with appropriate emergency egress, hot water for bathing and showering, adequate heat and ventilation, and reasonable personal space along with reasonable entry and exit privileges.
8. Workers shall receive appropriate workplace health and safety training. Health and safety related information shall be clearly posted in the facility.

Environmental

1. Facilities shall acquire, maintain and keep current all environmental permits, approvals and registrations and reporting requirements required by law.
2. The generation of waste and use of resources, including water and energy, are to be reduced or eliminated by practices such as materials substitution, conservation, recycling and re-using materials. Facilities are to look for cost effective methods to improve energy efficiency, minimize energy consumption and greenhouse gas emissions
3. 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. Solid waste (non-hazardous) shall be identified, managed, reduced, and responsibly disposed of or recycled. Wastewater generated from operations or sanitation facilities are to be monitored, controlled and treated as required by law. Measures should be implemented to reduce the generation of wastewater.
5. Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be routinely monitored, controlled and treated as required by law.

6. Facilities 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.
7. Facilities shall identify risk of contamination of storm water runoff and shall prevent illegal discharges and spills from entering storm drains.

Ethics

1. San-tron has a zero tolerance policy for any and all forms of bribery, corruption, extortion and embezzlement. All business dealings shall be transparently performed and accurately reflected on company's business books and records. Bribes or other means of obtaining undue or improper advantage shall not to be promised, offered, authorized, given or accepted either directly or indirectly through a third party, in order to obtain or retain business
2. The confidentiality, anonymity and protection of supplier and employee whistleblowers shall be maintained, unless prohibited by law.
3. Information regarding labor, health and safety, environmental practices, business activities, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification or misrepresentations of records in the supply chain are unacceptable.
4. The transfer of technology and knowhow is to be done in a manner that protects intellectual property rights, and customer information is to be safeguarded.
5. San-tron shall not procure products that contain the tantalum, tin, tungsten or gold from the Democratic Republic of the Congo or an adjoining country. We shall exercise due diligence on the source and chain of custody of these minerals within our supply chain.
6. We are committed to protecting the reasonable privacy expectations of the personal information of everyone they do business with, including suppliers, customers, consumers and employees. We shall comply with privacy and information security laws and regulatory requirements regarding collection, retention, transmittal or the sharing of personal information

Management

1. It is the responsibility of the President, Directors and Management of the company to affirm compliance with this policy and review the company's status on a regular basis.
2. The company shall designate individuals accountable for implementing systems that affirm compliance with this policy
3. Training programs for managers and workers shall be implemented to affirm this policy, related procedures and objectives, and to meet all legal and regulatory requirements