



Supplier Code of Conduct

Policy No: TAMS 4.2.1.1

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Issued By:	TOP ACES INC.
Policy Owner:	<i>Sourcing Manager</i>



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TAMS 13.1.2.1.1 – Policy Template Rev. 3

1 BACKGROUND AND PURPOSE

At Top Aces, we are committed to upholding ethical business practices and expect our suppliers to share the same commitment. This commitment aligns seamlessly with our core company values of Service, Integrity, Excellence, and Together. The Supplier Code of Conduct outlines the minimum standards that all Top Aces’ suppliers, consultants, subcontractors, and business partners (collectively referred to as “Suppliers”) must adhere to in their operations and when conducting business with or on behalf of Top Aces. This Code of Conduct is not intended to be an exhaustive list covering all possible scenarios and does not replace the need for common sense and good judgment.

1. Compliance with Laws and Regulations

Suppliers are required to adhere to all applicable laws, regulations, and standards, both in the countries where they operate and those relevant to the supply of goods or services to Top Aces. This includes, but is not limited to, laws pertaining to labor, health and safety, environmental protection, privacy, export and import, industrial/contract security, and anti-corruption. In the event of a conflict between this Code and any applicable laws or regulations, the latter shall take precedence and must be followed.

2. Labor Practices

Fair Treatment: Suppliers must ensure that all employees are treated with respect and dignity. Discrimination, violence, harassment, intimidation, and any other forms of abusive behaviour are strictly prohibited.

Child Labor: Suppliers must not engage in or support the use of child labor, as defined by the International Labour Organization (ILO) conventions.

Forced Labor: Suppliers must not engage in or support the use of forced labor, including bonded labor, involuntary prison labor, or human trafficking.

Working Hours: Suppliers must comply with applicable laws and industry standards regarding working hours, including overtime and rest periods.

Wages and Benefits: Suppliers must provide wages and benefits that meet or exceed legal minimum standards and are sufficient to ensure a comfortable and dignified standard of living for employees.

Privacy: Suppliers must implement reasonable measures to ensure that personal data is gathered, processed, used, and stored in accordance with applicable laws.

3. Health and Safety

Suppliers must provide a safe and healthy working environment for all employees. This includes taking proactive measures to prevent accidents and injuries, providing necessary safety equipment, and ensuring access to clean drinking water and sanitary facilities.



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4. Environmental Responsibility

Suppliers must comply with all applicable environmental laws and regulations. They should actively work to minimize their environmental impact through responsible waste management, reduction of greenhouse gas emissions, and conservation of natural resources.

5. Community Involvement

Suppliers are encouraged to actively engage in and contribute to the communities in which they operate. This includes supporting local initiatives, participating in community development projects, and fostering positive relationships with community members. By investing in the well-being of their communities, suppliers help to create a sustainable and inclusive environment that benefits both their business and the broader society.

6. Business Integrity

Ethics and Professionalism: Suppliers have a duty of good faith and honest performance in meeting their commitments throughout the procurement process.

Anti-Corruption: Suppliers must not engage in any form of corruption, including bribery, extortion, or embezzlement. Top Aces maintains a zero-tolerance policy towards corruption.

Conflict of Interest: Suppliers must avoid any conflicts of interest that could compromise their ability to act in the best interest of Top Aces.

Honesty and Courtesy: Suppliers are required to conduct all business activities with the highest standards of honesty, transparency, and integrity. This includes being open and truthful in all interactions and communications. Suppliers are expected to demonstrate care and courtesy, treating all individuals with respect and consideration. Adhering to these principles is essential for maintaining a trustworthy and collaborative partnership.

Confidentiality: Suppliers must protect any confidential or proprietary information shared by Top Aces and use it only for its intended purpose.

7. Monitoring and Compliance

Top Aces reserves the right to monitor and assess supplier compliance with this Code of Conduct. This may include reasonable on-site inspections, audits, and reviews of relevant documentation. Suppliers are expected to cooperate fully and provide timely and accurate information.

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8. Quality Standard

Suppliers are expected to:

- Ensure their products and services meet or exceed applicable industry or product quality standards, or as specified in orders or contracts.
- Minimize the risk of introducing counterfeit parts or conflict materials, and immediately notify relevant parties if detected, removing them from any deliverable products.
- Maintain an effective internal quality management system and proactively monitor their supply chains.
- Implement corrective action plans promptly whenever defects are identified.

9. Protecting Company Assets and Information

We depend on our suppliers to safeguard our company assets from unauthorized access, loss, damage, theft, and misuse. This includes physical assets, confidential information, trade secrets, copyrights, trademarks, and any other data accessible to the supplier.

Suppliers are expected to:


- Handle sensitive information appropriately, using it only for its intended business purpose unless otherwise authorized.
- Follow all data privacy and data protection laws.
- Respect intellectual property rights and comply with related laws.
- Maintain robust cybersecurity measures to protect their systems from unauthorized access and threats.
- Inform us immediately of any unauthorized use or potential security breaches.

10. Contracting with the Government

Suppliers are expected to comply with all applicable regulations when contracting with governments. This includes competing fairly, providing accurate and complete information, complying with restrictions on hospitality, gifts, and employment offers, and promptly reporting and suspected violations. Any additional specific requirements must be clearly outlined in the orders or contracts as applicable.

11. Consequences of Violation

Failure to uphold the principles outlined in this Supplier Code of Conduct may prompt Top Aces to review the business relationship and take appropriate corrective actions. If the supplier fails to reasonably implement these corrective actions, Top Aces reserves the right to terminate the business relationship in accordance with the terms of the applicable contracts.

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12. Reporting Violations

Suppliers must promptly report any violations of this Code of Conduct to Top Aces. Reports can be made confidentially and without fear of retaliation.

By adhering to this Supplier Code of Conduct, suppliers demonstrate their commitment to ethical business practices and contribute to the long-term success and sustainability of our mutual business relationships. Thank you for your cooperation and commitment.

Top Aces reserves the right to periodically update this Code of Conduct. Suppliers are responsible for ensuring their compliance with the most current version.

Anyone who suspects that a supplier has engaged in illegal, unethical, or improper conduct, or has violated this Supplier Code of Conduct in any way, is encouraged to report such behavior through one of the following channels.

Top Aces Inc.	Tel: Toll-Free: +1 866-694-5565 or Email: governance.compliance@topaces.com
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