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DEEP SEA ELECTRONICS LTD

CODE OF CONDUCT



1. Introduction

Deep Sea Electronics Ltd (DSE) is committed to quality and is continually striving to meet and exceed customer expectations of our products and support services. We conduct our affairs by complying with all applicable laws and regulations but always look to go that extra step, with a philosophy that is focussed on integrity, compliance and responsible operations.

We, therefore, expect that all our suppliers and partners within our chain of supply should demonstrate the same values and commitment to the principles outlined in this Code of Conduct, irrespective of culture or language. We recognise that, in a global environment, legal and cultural requirements may vary and suppliers and partners must follow the applicable laws of their country, but this code also highlights a number of areas that we must all follow, to work in a responsible, respectful and successful manner overall.



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2. Laws and Regulations

DSE expects our suppliers and partners to avoid activities that may create any conflict between DSE interests and their own interests. Several areas, where conflict may occur, are covered below.

2.1 Fair Competition and Relationships

In the global marketplace, it is necessary to compete for business and DSE are no different to other companies in doing so. However, it is important that we compete within the rules, fairly and honestly, and expect our suppliers to do likewise. We must all abide by the laws that cover agreements between competitors or resellers, price discrimination, price fixing and any other aspects that may preclude fair competition. It is important that we maintain integrity and do not attempt to mislead others, or use confidential information belonging to others, to gain business.

2.2 Local and International Trade laws

DSE suppliers and partners have a responsibility to follow all applicable international trade laws, including import/export control regulations as well as complying with sanctions and anti-boycott laws. This can mean restrictions or control of export or re-export of goods or data to other countries, and may include DSE technology to which Suppliers and Partners have access. Suppliers and partners should be aware of this and should not violate any regulations but work with DSE as necessary to cover all matters in the correct manner.

2.3 Anti-Bribery and Corruption, including Facilitation of Tax Evasion

DSE does not condone bribery in any form and does not accept that bribery plays any part in our business affairs. We regard it as an offence to offer, promise or give a financial or other advantage to induce (or reward) a person to improperly perform a function or activity to gain business advantage. This applies whether requesting or receiving a bribe and in all areas of our business. Hospitality and promotional events are specifically excluded, where they are reasonable and proportionate. With regard to Part 3 of the Criminal Finances Act 2017 (UK), DSE and its partners must also not be party in any way to an associated person criminally facilitating the evasion of a tax, whether the tax evaded is owed in the UK or a foreign country. This again is something that cannot be tolerated in our business.

2.4 Conflict-Free Sourcing

DSE is required to trace the supply of certain minerals (Gold, Tin, Tungsten and Titanium, (3TG)), known as conflict minerals, as a supplier to USA companies currently. This requires that all suppliers to DSE must, for reporting purposes, similarly trace the origin, to smelter level, of conflict minerals used in manufactured parts. DSE encourages suppliers to adopt similar reporting policies, currently based on the EICC-GeSI Conflict Minerals Reporting Template (CMRT), and utilise due diligence procedures to ensure that DSE products are free of conflict minerals by procuring these minerals from recognised conflict-free sources. This initiative is currently in a transformational stage and will, in future be called the Responsible Minerals Initiative (RMI) and be operated on a wider base.



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3. People

3.1 Human Rights

DSE supports internationally recognised human rights regarding employees and all associates, wherever they are located in the world. This encompasses the principles laid down in the United Nations Declaration of Human Rights (UNDHR) and the International Labour Organisation (ILO) 1998 declaration on fundamental principles and rights at work, as well as local rules to ensure respect for all human rights.

We expect our suppliers and partners to accept and uphold these principles in their own business, in developing their own approach to respecting the same goals.

3.2 Transparency in Supply Chains – Modern Slavery Act

DSE currently post a modern slavery statement annually on our website, covering an ongoing update report of DSE actions in support of the aims of Section 54 of the Modern Slavery Act (Transparency in Supply Chains). It sets out the steps that DSE take to ensure that modern slavery, which includes slavery, servitude, forced labour and human trafficking, is not taking place in our business or supply chains.

DSE do not condone and will not accept the use of slave or involuntary labour of any kind by our suppliers and partners. There must be no use of corporal punishment, abuse (physical or psychological), threats or coercion in carrying out duties for supply of goods, be it to DSE or others.

3.3 Discrimination/ Diversity and Inclusion

We expect suppliers and partners to value the diversity of talents, skills and experiences that enable people to achieve business results, irrespective of ethnic descent, race, colour, religion, gender, sexual orientation, gender identity, age, physical or mental disability, political affiliation maternity or marital status, amongst others. Suppliers must recruit employees, and suppliers of their own, based on their qualifications for the work only.

Suppliers and partners should also maintain policies prohibiting harassment and discrimination of any form, with periodic reviews of recruitment and promotion practices to ensure fair treatment of all employees.

3.4 Working Hours and Compensation

DSE comply with all applicable laws regarding working hours, wages and overtime pay and believe it is reasonable to expect that our suppliers and partners do likewise.

All employees must be paid at least the minimum legal wage, or a wage that is in line with local industrial standards, and limit overtime to a level that ensures safe and productive working conditions. Hourly wage rates for overtime should be higher than the rates for regular hours working.

Employees should receive time off, paid annual leave and statutory holidays as covered by local laws.

3.5 Freedom of Association

Suppliers and partners must respect the right to freedom of association for employees and the right to bargain collectively. They should be able to choose to join a union, or not, and should not be discriminated against based on their choice. Suppliers and partners must also respect all other employee workplace rights.



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4. Health and Safety

DSE expect suppliers and partners to ensure a safety-first approach to prevent all injuries, occupational illnesses and safety incidents. This means having policies that promote the health, safety and general wellbeing of individuals, co-workers and any site visitors. Everyone connected to the DSE chain of supply should apply this commitment to safe practice.

4.1 Workplace Safety

The work environment should be well lit and well ventilated and assessed for health and safety hazards on a regular basis, with a view to eliminating or controlling any identified risks. It is important that employees be fully trained in all procedures relating to their work environment and, in particular, safety-related procedures such as in the event of fire evacuation. The workplace should have clear warning signs and health and safety information signs posted, as well as clearly-signposted and unimpeded exits for evacuation in an orderly manner when required.

The workplace should also have suitable fire alarms and adequate fire extinguishing equipment in line with local, legal requirements

4.2 Machine Safety

All production and associated machinery should be inspected, maintained and serviced on a regular basis and be fitted with appropriate operational safety devices. In the case of servicing or maintenance, machinery should be capable of being shut off, locked out/tagged out, as appropriate, to avoid injury due to unexpected starting etc.

Only trained personnel should be allowed to use the machinery and any impaired employee, due to alcohol or drugs for example, should be prohibited from working. There must be strict internal policies to prevent the use of drugs or alcohol in the workplace environment.

4.3 Employee Safety and Welfare

All employees should have ready access to applicable safety equipment, at no cost, to fulfil their duties. This may include items such as gloves, safety shoes, safety glasses, ear defenders and respiratory protection etc., and should be controlled and stored in a clean and healthy environment. These requirements should also be extended to contractors and site visitors, where applicable.

Amenities such as safe drinking water, clean toilet facilities should be reasonably accessible through the working day, as should access to internal medical facilities for minor injuries or external medical services in the event of more serious or emergency incidents.

Training for all employees, in their duties and responsibilities towards themselves, colleagues and contractors, must be mandatory and regularly updated to ensure upkeep of the health and safety policies.





5. Protection of Intellectual Property

5.1 Intellectual Property

Intellectual property is extremely valuable to DSE and is protected at all times. Intellectual property may be trade secrets, confidential financial details, future product plans and generally information not in the public domain.

In all working relationships, we expect our suppliers/partners to respect the Intellectual Property rights of DSE and all others in their Supply network. They must take all reasonable steps to ensure that sensitive information is protected at all levels and must not pass similar information from their other customers to DSE without the correct permissions in place. When sensitive information is to be communicated between DSE and a supplier/partner, or other third parties, a confidentiality or non-disclosure agreement (NDA) must be in place.

A Supplier/partner must not use DSE Intellectual property for any purpose other than that permitted in the course of working with DSE, nor claim or register it in their own name. If they become aware of any violation of DSE intellectual property rights, they must immediately notify DSE.

All parties with access to DSE intellectual property must maintain both physical and electronic security measures to protect it and all employees of all parties, including DSE, must use appropriate care to protect it, eg. verbal discussions should take place in a secure location. Confidential data should also not be stored in locations such as personal email or private electronic devices, without authorisation.

5.2 Innovation

DSE has a history of innovative product development and we expect our suppliers/partners to similarly develop new technology and methods to improve their product performance, extend product life and ensure locations are more productive, more efficient and safer overall.

5.3 Protection of Assets/ Counterfeit Protection

DSE has built a reputation based on quality and reliability of its products and it is important to protect this in the marketplace by preventing the use of counterfeit units. This also passes down the supply chain and the use of counterfeit components must also be protected against.

DSE expects that suppliers must ensure the authenticity of their parts and be able to provide information regarding the source of parts/materials when requested to do so.

DSE also expects suppliers/partners to protect any DSE information or products in their possession against any fraudulent use that may lead to other parties being able to produce counterfeit copies of DSE products. Appropriate controls must be in place.

5.4 Personal Data and Privacy

DSE is committed to protecting the privacy and personal data of all our employees, customers and suppliers/partners. We ensure that when collecting or transferring personal data, security requirements are followed using the DSE Data Protection Policy based on the European Union (EU) General Data Protection Regulations (GDPR). Suppliers/partners that handle employee and customer personal data must also comply with all regulatory requirements and meet the same level of security standards.



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6. Environmental Protection and Resources

6.1 Product Safety and Prohibited Substances

Product safety is a concern for all manufacturing companies and DSE is no different in complying with all laws and regulations for its products.

DSE products are designed and manufactured to take account of all necessary safety regulations and, where relevant, DSE expects suppliers/partners to comply and certify all component or sub-assembly data in a true and accurate manner to ensure product safety is not compromised in any way.

6.2 Prohibited Substances

Certain substances are prohibited for use in electronic products by legislation such as Restriction of Hazardous Substances (RoHS) and Registration, Evaluation and Authorisation of Chemicals (REACH) as well as other local regulations around the world. Such rules apply to DSE and all suppliers, partners, and their associated supply chains to ensure final product compliance.

DSE expects all suppliers/partners to comply with all necessary reporting requirements to allow DSE to demonstrate full compliance with required regulations.

6.3 Resource Conservation/Waste Reduction

In a global market, it is our collective responsibility to protect the environment and comply with all applicable environmental laws, regulations and standards.

DSE expects suppliers/partners to manage compliance, minimise environmental impact and employ continuous improvement. This should be achieved by improving the quality and efficiency of their operations by using processes that prevent waste and promote the efficient use of resources. Reducing water usage and inadvertent discharges in a water-scarce area, reducing greenhouse gas emissions, minimising engine and factory emissions into the environment, as well as improving energy efficiency and increasing use of renewable energy sources, are all areas of potential improvement that are key to sustainable progress.

DSE encourage suppliers/partners to implement an audit plan for compliance to applicable environmental regulations and standards, including corrective actions and prevention of recurrence. Procedures should also be in place for contacting relevant authorities in case of environmental incidents.

