

CODE OF CONDUCT



Spencer Composites Corporation

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OUR VALUES

What are values? Values are the standards that guide our behavior. Our values provide the foundation for our commitment to the highest level of ethical conduct, a commitment we take very seriously.



OUR CODE OF CONDUCT



Our set of principles portrays our obligation to our qualities, sums up the fundamental strategies, laws, and guidelines that we want to know while working, and is our manual for moral independent direction. Settling on moral choices is vital for how we work with one another, with our clients and colleagues, and inside our worldwide local area.

Following the code is obligatory. We have a commitment to consent to our code, our arrangements, and the laws where we carry on with work. Infringement is treated in a serious way at SCC and may bring about disciplinary activity, up to and including the end of work. We additionally expect all outsiders with whom we contract, including specialists, providers, and project workers, to consent to our set of principles with directing business for SCC's sake.



OUR RESPONSIBILITIES

We as a whole have an obligation to experience the SCC qualities and we will:

- Be responsible for our own lead
- Follow the strategies, laws, and guidelines that apply to our positions
- Look for direction, raise concerns, and report any noticed or suspected unfortunate behavior

HANDLING CONCERNS AND INVESTIGATIONS

All inquiries, concerns, and reports of conceivable unfortunate behavior are approached in a serious way. SCC will make a fitting move at whatever point infringement of our code, strategy, or law has happened. The substance, everything being equal, will be dealt with privately as well as namelessly, to the degree conceivable. This implies that all workers are relied upon to help out inward examinations and meetings; consistently come clean and never give bogus explanations.

GOVERNMENT INVESTIGATIONS AND INQUIRIES

Given the highly regulated environment in which we operate and the nature of the work we do, there may be times when a government official contacts an SCC employee directly as part of an inquiry or investigation. In these specific cases, it is expected that, after confirming the identity and authority of the individual as a government official, employees are cooperative, honest, and notify SCC management immediately following such contact. Employees are not authorized to present themselves as SCC representatives to government authorities, or to release an information on behalf of SCC, unless specifically authorized by SCC management.

OUR CULTURE OF NON-RETALIATION

SCC strictly prohibits any form of retaliation against an employee, who in good faith reports a violation of the Code or law or assists in the investigation of a reported concern. Those who engage in such behavior against others, may be subjects to disciplinary action, up to and including termination.



PRODUCING QUALITY PRODUCTS

Conveying quality items and administrations that meet our client's prerequisite is basic to building long haul client connections. To guarantee we meet our quality responsibilities to our clients, we will:

Endeavor to do each occupation right the initial time

Set up totally required reports precisely and totally

Just use materials and cycles adjusting to the quality levels indicated in each agreement

Not purposely distort, in any capacity, the state of status of administrations or items presented in examination, testing, or conveyance.

WORKING WITH THE U.S. AND OTHER GOVERNMENTS



In all of our transactions, we act in a genuine and moral way and expect something very similar from each and every individual who deals with our sake, including, yet not restricted to, specialists, colleagues, subcontractors, and other outsiders.

Working with the governments means that we:

- Maintain the highest levels of procurement integrity
- Provide accurate submissions of our work here at SCC
- Understand and avoid organizational conflicts of interest
- Avoid bribes and illegal or unethical commissions



COMPETING FOR GOVERNMENT BUSINESS

The Procurement Integrity Act states a series of prohibitions designed to protect the integrity of the procurement process by ensuring that competitors for government contracts compete on a level field of play. This is done by safeguarding access to competitive information and imposing post-employment restrictions on certain current and former government employees. The Integrity Act prohibits government officials from disclosing to SCC, without written consent, any other contractor's bid or proposal information or the government's internal source. As SCC employees, it likewise prohibits us from improperly seeking or obtaining those types of information stated above.

ACCURATE REPORTING FOR U.S. GOVERNMENT CONTRACTS

Accurate reporting means that we, as a company, ensure that we provide to our government customers is current, truthful, complete, accurate, and submitted in a timely manner. This includes:

- Anything related to costs (e.g., labor hours, travel, and other costs)
- Bids and proposals
- Claims and disclosures

ORGANIZATIONAL CONFLICTS OF INTEREST

Organizational conflicts of interest (“OCI”) may occur in connection with government contracts when activities being performed by the contractor can either result in an unfair competitive advantage for the contractor or the work may impair the contractor’s ability to be objective. For example, if we drafted specifications for a government contract, we might be precluded from bidding on that contract.

PREVENTING PAYOLA

No matter where we live or work in the world, we all need to stick to the United States. Foreign Corrupt Practices Act ("FCPA"). Employees are prohibited from offering, offering, soliciting, or accepting bribes or kickbacks, whether or not they do business with government officials, political parties, or representatives of commercial organizations.



AVOIDING CONFLICTS OF INTEREST

We are trusted to always act in the best interest of Spencer Composites Corporation, devote our professional effort to our jobs, and avoid conflicts of interest. "Conflict of Interests" can arise when a personal interest conflict, or appears to conflict, with the best interests of the company.

Anything that conflicts with the interests of SCC must be promptly and fully disclosed. Some popular examples include:

- Hiring or managing a family member or someone whom we have a personal relationship, including romantic/dating.
- Having a business relationship with supplier, contractor, or customer where there is a family, financial, or personal relationship.
- Being employed by or having a business connection with a competitor, supplier or customer.
- Using SCC equipment or resources for non-business purposes.
- Taking personal advantage of business opportunities discovered through the use of company property, information or our position.
- Obtaining outside employment that gives access to third-party intellectual property that is the same or similar as that which SCC owns, is developing, or has access to.



MAINTAINING A SAFE AND HEALTHY WORKPLACE

We here ae committed to conducting operations and activities in a manner that provides and maintains safe and healthy working conditions. Be sure to comply with all applicable health, safety, and security laws, policies, procedures, internal controls and regulations. Make sure to pay close attention to risk and never :

- Do not block fire exits, fire extinguishers or electrical panels with furniture or equipment.
- Do not disregard safety or environmental rules established in procedures or training.
- Wear personal protective equipment as directed.

A WORKPLACE FREE FROM SUBSTANCE ABUSE

The unauthorized use of controlled substances, drugs, prescriptions or alcohol can create major safety risks. The possession, sale or use of any uncontrolled substance, or being under the influence of such unauthorized substances, on company time, property, or company-sponsored events is prohibited.

AVOIDING HARASSMENT

SCC won't endure provocation of any kind, including physical and enthusiastic, that objectives singular's race, orientation, sexual direction, religion, handicap, age, or other safeguarded qualities, this reaches out to partners, supplies, clients, and any other person who works with the organization. This prohibition likewise reaches out past the working environment, to any business-related setting, and on electronic media, including websites, messaging, texting, and web-based media. Provocation is in opposition to our qualities, makes a hostile or in any case hurtful workplace, and slows down the work execution.

A WORKPLACE FREE FROM VIOLENCE

As part of SCC's commitment to safety, our work must be free from physical violence. Workplace violence takes many forms such as :

- Threats of violence toward any person or property.
- Stalking or other forms of intimidation.
- Domestic violence affecting the workplace.
- Sabotage of property.



PROMOTING DIVERSITY, INCLUSION, AND RESPECT IN THE WORKPLACE

We admire that every employee here at SCC brings a unique background and thought, as well as their set of abilities. Having as much diversity as we do here at SCC, we create more innovative solutions as does it enhance our delivery of world-class customer service.

We treat individuals with pride, decency, and regard. We establish a comprehensive climate where variety in individuals and viewpoints is esteemed. We make progress through cooperative endeavors and accomplishments to normal, characterized targets. We try to give a workplace where everybody can perform successfully and accomplish their maximum capacity.

PREVENTING DISCRIMINATION

As an equivalent open door business, SCC is focused on treating all representatives and candidates for work with deference and nobility and keeping a work environment that is liberated from unlawful discrimination. We enlist, create, advance discipline, and give different states of work regardless of race, shading, religion, public beginning, orientation, age, disability, hereditary turmoil, preposition or transporter status, marital or association status, veteran status, sexual orientation, orientation identity or articulation. We likewise give sensible accommodations to qualified representatives and candidates as legally necessary.

GUARDING CLASSIFIED INFORMATION

We are on the whole liable for understanding the responsiveness of the data shared with our consideration. In many events, the legislatures we work with give us admittance to characterized data that requires unique taking care of and proceeding with a commitment to safeguarding it consistently. There are numerous laws and guidelines that connect with the assurance of arranged data, which are complicated and fluctuate by nation and government organizations. We should be comfortable with these laws and guidelines and intently keep the security rules definite in our agreements or by the significant government organization.



SAFEGUARDING PROPRIETARY INFORMATION

At SCC, we own, make, and approach a lot of data. As per arrangements and information security laws, we should safeguard and appropriately handle data in composed, electronic or whatever other structure, regardless of whether got from or connecting with SCC, its providers, clients or other outsiders.



SECURING COMPANY ASSETS AND PROPERTY

We are personally responsible for protecting SCC assets, and those provided to us by our customers, against unauthorized access, fraud, theft, loss, or abuse. This means we:

- Immediately report any suspicions of cyber-attack
- Use and manage property provided by a government customer or other third party according to the terms of the agreement or contract

