



China Electrical Contact LLC

Code of Conduct

Introduction

China Electrical Contact, a subsidiary of Alloy Holdings LLC and its affiliates, is committed to upholding the highest standards of ethical conduct and social accountability in all business dealings worldwide, including interactions with business partners, suppliers, customers, and third-party vendors. This Code of Conduct declares our commitment to comply with local and international laws and uphold the ethical standards outlined in the Ethical Trading Initiative (ETI) Base Code.

Code of Conduct - Purpose

This document articulates Checon's ethical behavior and expectations of integrity in all business activities. We aim to ensure that all business partners, employees, suppliers, customers, and third-party vendors act by our high standards and create an environment where ethical decisions guide our operations.

Who is Covered?

This Code applies to all employees, vendors, stakeholders, contractors, and agencies associated with China Electrical Contact, a subsidiary of Alloy Holdings LLC, and its affiliates worldwide.

China Electrical Contact Core Values

Checon's Core Values form the foundation of our business conduct and are focused on the same tenets of ethics, excellence, and innovation that have guided the company for more than sixty years. Integrity, Accountability, and Respect for Individuals and Communities are based on our values and inform our conduct daily.

I. Do the Right Thing - Our People

a. Equal Opportunity and Non-Discrimination

In line with the ETI Base Code, we ensure that all employment practices, including hiring, promotion, and compensation, are free from discrimination. We provide equal opportunity without regard to race, color, religion, gender, age, national origin, disability, or other protected status.

b. Health and Safety

Consistent with the ETI Base Code's guidelines, we prioritize a safe and healthy work environment by minimizing risks and providing regular health and safety training.

c. Living Wages

Wages shall meet at least minimum legal or industry standards, sufficient to meet basic needs and provide some discretionary income.

d. Reasonable Working Hours

Working hours comply with national laws and are not excessive. Overtime is voluntary and compensated at a premium rate.

e. Non-Discrimination

There will be no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on legally protected characteristics.

f. Regular Employment

Work shall be based on a recognized employment relationship established through national law and practice.

g. No Harsh or Inhumane Treatment

No physical abuse, the threat of physical abuse, sexual harassment, or other forms of harassment or intimidation will be tolerated.

h. Freedom of Association and Collective Bargaining

We respect the right to form and join trade unions and bargain collectively.

i. Safe and Hygienic Working Conditions

A safe and healthy working environment shall be provided, minimizing the risks of accidents and injury. Regular health and safety training will be conducted.

j. Prohibition of Child Labor

No child labor shall be employed under any circumstances. Any child found working would be removed and provided with access to education.

k. Community Involvement and Corporate Citizenship

We actively engage and support our communities through responsible corporate practices, volunteerism, and sustainable initiatives.

II. Do the Right Thing - Our Business

a. Legal Compliance

We adhere strictly to the legal frameworks of the jurisdictions in which we operate, ensuring all business activities are lawful and ethical.

b. Financial Integrity

We ensure the accuracy and integrity of our financial reporting and maintain rigorous controls to safeguard assets and shareholder interests.

c. Regulatory Compliance

We comply with all applicable regulations, including trade controls, OSHA, and EPA guidelines, reinforcing our commitment to lawful and ethical business practices.

d. Environmental Sustainability

Aligned with the ETI Base Code's environmental standards, we are committed to reducing our ecological footprint through effective waste management and sustainable resource use.

e. Information Security

We maintain robust security measures to protect intellectual property and confidential information against unauthorized access and breaches.

III. Do the Right Thing - Our Customer and Partner Relationships

a. Commitment to Customer Satisfaction

We are committed to exceeding customer expectations through superior service and product quality.

b. Fair and Honest Business Dealings

We conduct all business dealings fairly and honestly, strictly adhering to anti-corruption and anti-bribery policies to ensure transparency and integrity.

IV. Do the Right Thing - Our Responsibilities

a. Reporting Misconduct: See Something, Say Something

We encourage open communication about ethical concerns and provide secure channels for reporting misconduct, ensuring confidentiality and protection from retaliation.

b. Communication and Training

We commit to regular training and ongoing communication to ensure all employees understand and can effectively apply this Code of Conduct in alignment with the ETI Base Code principles.

c. Implementation and Compliance

· **Management Accountability and Responsibility**

Senior management will implement and enforce the policies outlined in this Code of Conduct within their respective affiliates, departments, and teams.

· **Audits and Compliance Monitoring**

Regular social compliance audits will be conducted to ensure adherence to this Code, including unannounced audits and worker interviews by independent third parties.

· **Training and Capacity Building**

Training programs will be established to educate employees and management on their rights and responsibilities under this Code of Conduct.

- **Reporting Violations**

A confidential reporting mechanism will be established for workers to report violations of this Code without fear of retaliation.

Checon's Commitment to Continuous Improvement

We commit to continuously improving our implementation of the practices outlined in this Code by seeking and engaging in collaborative initiatives that drive ethical trade practices forward globally.

This document fully integrates and communicates the ethical commitments and practices that Alloy Holdings LLC and its subsidiaries pledge to uphold. It is structured to provide actionable guidelines and standards for all associated entities to follow, ensuring compliance and fostering a culture of integrity and ethical responsibility.

China Electrical Contact is a subsidiary of Alloy Holdings, LLC, a metals solutions company dedicated to serving the automation and industrial control, power distribution, and precious metal alloys markets. Connect with us!