

Manasota Optics, Inc.

BUSINESS STANDARDS SUPPLIER CODE OF CONDUCT

Issue #9 dated 08/11/2023

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Manasota Optics Inc. (“MOI”) is an ISO 9001:2015 certified build to print manufacturer. MOI requires all of its vendors, suppliers, and subcontractors (“Supplier(s)”) to adhere to all applicable laws and regulations which apply to their performance or supply of materials or parts to MOI. The purpose of these Business Standards / Supplier Code of Conduct (the “Standards”) is to provide guidelines for the performance and supply by a MOI Supplier. As a United States (“US”) federal government contractor or subcontractor, MOI may require any Supplier to certify in writing its compliance with any or all of the Standards which are included in these Standards. These Standards do not include all of the areas in which certifications may be required for your performance or supply under a Contract with MOI. A Supplier must meet the requirements of the Contract under which they are providing services or materials to MOI. These Standards are intended to supplement, but do not change any contractual requirements. Violation of these MOI Standards could result in your disqualification as a MOI Supplier.

Issues which are included in these Standards include:

- Equal Opportunity Practices and Affirmative Action Compliance
- Cyber Security
- Human Trafficking
- Export Compliance
- Supplier Quality Expectations
- Specialty Metals Restrictions
- Counterfeit Electronic Part Prevention
- Anti-Bribery and Corruption

The Standards included here do not and are not intended to cover all issues which may be required under any Contract or other performance by a Supplier. Should the requirements of any law or regulation be revised, amended, or supplemented, you will be required to adhere to such new requirements, as well as any other requirements not addressed here, but which may be applicable to your performance. MOI also expects all Suppliers to commit to continuous improvement of its business standards and processes. If a Supplier is submitting a quote or proposal to MOI based on its size or ownership (i.e., Small Business, Women-owned Business, Small Disadvantaged Business, Veteran-owned Business, etc.) it may be required to provide proof of such status.

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EQUAL OPPORTUNITY PRACTICES AND AFFIRMATIVE ACTION COMPLIANCE

As a US federal government contractor or subcontractor, MOI and its Suppliers are subject to all applicable rules and regulations set by the U.S. Department of Labor; and Office of Federal Contract Compliance Programs (OFCCP). This requires that MOI and each of its' Suppliers is in compliance with the Equal Opportunity Clause declared in FAR 52.222-26 and the Affirmative Action Programs required by the rules and regulation of the Secretary of Labor (41 CFR 60-1 and 60-2). MOI and its Suppliers are expected to prepare and use Affirmative Action in hiring practices. All solicitations or advertisements for employment by MOI and its Suppliers must include statements that all qualified applicants will receive consideration for employment without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, disability, or status as a protected veteran. An Equal Employment Opportunity poster should be prominently displayed on each party's premises. Affirmative Action is intended to ensure that applicants and employees of federal contractors have the same opportunity for hiring, recruitment, advancement with employment without regard to their race, color, religion, sex, sexual orientation, gender identity, national origin, disability or status as a protected veteran. EEOC protects applicants, employees and former employees from employment discrimination based on race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, age (40 or older), disability, and genetic information (including family medical history).

CYBER SECURITY

MOI has a system in place to show compliance with FAR 52-204-21 Basic Safeguarding of Covered Contractor Information Systems and DFARS 252.204-7012 Safeguarding Covered Defense Information and Cyber Incident Reporting. Suppliers of MOI are required to implement and maintain controls in compliance with the regulations listed above. This includes but is not limited to taking actions to reduce the risk of releasing Confidential Defense Information and Federal Contract Information. In addition, some federal contractors and subcontractors are required to be compliant with NIST (SP) 800-171 on relevant information systems. These are controls and security requirements regarding the storage, processing, or transmission of Controlled Unclassified Information (CUI) on any non-Federal computer system. You may be asked to provide your System Security Plan which has been prepared in accordance with the requirements of NIST (SP) 800-171 prior to beginning work with MOI. DFARS defines a "cyber incident" as actions taken through the use of computer networks that result in a compromise or an actual or potentially adverse effect on an information system and/or the information residing therein. **Cyber security incidents must be reported withing 72 hours to the Department of Defense Cyber Report Portal at <https://dibnet.dod.mil/> and basic cyber security self-assessments submitted to Supplier Performance Risk System, SPRS sprs.csd.disa.mil (login via P1EE).**

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HUMAN TRAFFICKING

MOI and its Suppliers are subject to applicable rules and regulations as defined in FAR 52.222-50 Combating Trafficking in Persons and the Trafficking Victims Protection Act, 22 U.S.C. 78. Human Trafficking is defined by the Department of Justice as a) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or b) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery. Suspected human trafficking should be reported to Federal law enforcement at (866) 347-2423. The National Human Trafficking Hotline can be reached at (888) 373-7888 or by texting “HELP” or “INFO” to BeFree (233733). This is available 24 hours/day, 7 days/week, every day of the year and is available in 200+ languages.

EXPORT COMPLIANCE

It is the policy of MOI to fully comply with all applicable US export laws and regulations. Use and disclosure of unclassified technical data obtained by MOI must be restricted to the purpose identified by the government agency when the data was provided.

The export laws and regulations include those administered by the Department of Commerce through its Export Administration Regulations (EAR), the Department of State through the International Traffic in Arms Regulations (ITAR) and Arms Export Control Act (AECA) as well as sanctions imposed by the Treasury Department through the Office of Foreign Assets Control (OFAC). MOI receives technical data (drawings, specifications, etc.) and optical components identified as subject to ITAR restrictions. MOI maintains registrations with ITAR; all employees of MOI receive annual training and are expected to follow the company’s written procedures adhering to the requirements for ITAR compliance. A Supplier which receives technical data from MOI for use in its performance are expected to adhere to the terms outlined in ITAR, 22 C.F.R. Part 120 – 130. A Supplier may be required to provide proof of training for any Supplier personnel which are placed on a Contract for MOI or for receipt of any technical data received from MOI.

MOI has written policies and procedures for the request and administration of Unclassified Technical Data (UTD) disclosing Military Critical Technology (MCT) obtained under the US – Canada Joint Certification Program (the “JCP”). This information is controlled in the US by DOD Directive 5230.25 and in Canada by the Technical Data Control Regulations. MOI maintains certification and all Suppliers receiving this information by any means of communication (email, fax, phone, face-to-face conversation, etc.) must maintain JCP certification.

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SUPPLIER QUALITY EXPECTATIONS

MOI expects all Suppliers to disclose information truthfully in accordance with all applicable laws. MOI annually conducts supplier performance reviews. Late delivery of product, failure to maintain applicable certifications, delivery of product that does not meet quality requirements of MOI Purchase Orders, failure to supply requested documentation (surveys, non-disclosure agreements, QAR documents, etc.), or receipt of a “below expectations” performance report may result in MOI issuing a Supplier Discrepancy Report and potentially such Supplier being removed from our Approved Supplier List.

SPECIALTY METALS RESTRICTIONS

When components, parts, or products containing tin, tantalum, tungsten, or gold, are manufactured, they must contain materials from environmentally and socially responsible sources only. Materials, which either directly or indirectly contribute to conflict, will not be accepted. Suppliers in this category must perform due diligence regarding the source and chain of custody of any minerals of the kind or nature identified under all applicable rules or regulations relating to the sourcing and use of any such specialty metals. All contractors and subcontractors must be in compliance with the applicable rules of DFARS 252.225-7008 Restriction on Acquisition of Specialty Metals, DFARS 252.225-7009 Restriction on Acquisition of Certain Articles Containing Specialty Metals, and DFARS 252.225-7014 Alt 1 Preference for Domestic Specialty Metals. Within the Supplier’s facilities, DFARS compliant materials need to be segregated from DFARS non-compliant materials.

COUNTERFEIT ELECTRONIC PART PREVENTION

Contractors and all subcontractors subject to Cost Accounting Standards (CAS) are required to adhere to DFARS 252.246-7007 Contractor Counterfeit Electronic Part Detection and Avoidance Systems. This applies to a) electronic parts, b) end items, components, parts, or assemblies containing electronic parts, c) or services where the contractor will supply electronic parts or components, parts, or assemblies containing electronic parts. MOI will inspect and test electronic parts for acceptance and subsequently quarantine any suspected counterfeit electronic parts. Upon knowledge of potential counterfeit electronic parts, they will be reported to the Government-Industry Data Exchange Program (GIDEP). To reduce the risk of purchasing counterfeit parts products should be purchased directly from the original component manufacturer (OCM), original equipment manufacturer, (OEM), through an OCM/OEM authorized supplier (distributor), or from suppliers that obtain such parts exclusively from the original manufacturer or authorized dealers.

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ANTI BRIBERY AND CORRUPTION

All MOI employees, owners, and its Suppliers will adhere to the rules and requirements of all applicable anti-bribery and corruption laws. MOI has a zero-tolerance policy regarding corruption and bribery of any kind, whether direct or indirect, to obtain or retain business. Bribery and corruption are illegal and can expose employees and the Company to fines, penalties, and imprisonment. Neither MOI nor its suppliers will seek to influence others, directly or indirectly, by offering, paying, or receiving bribes or kickbacks by any mean that is considered unethical, illegal, or harmful. This is inclusive but not limited to facilitation payments, kickbacks, bribes, gifts and hospitality exceeding \$100, political contributions, utilizing a third party to avoid liability, expenses not allowed within laws and regulations when dealing with government officials (both U.S. and non-U.S.) as well as the private sector. Except to the extent inconsistent with U.S. law, our Suppliers must comply with the anticorruption laws that govern operations in countries in which they do business, such as the U.S. Foreign Corrupt Practices Act and other similar laws prohibiting bribery and corruption in business dealings.

As noted above, the Standards outlined herein are not intended to be comprehensive, and there may be other regulations or laws which govern your performance. You are expected to know these laws and to assure that your employees, agents, and independent contractors adhere to all of them at all times. Additionally, there may be other regulations which will apply to your performance for MOI under a particular Contract. While we will provide you the information which is included in our Contract, you will be responsible for applying them in your workplace.

If you have any questions about the Standards or your Contract Requirements, please contact Jill Lowery at (941) 359-1748 or jill.lowery@manasotaoptics.com.

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