

1. Introduction

At Tricom Networks Inc., we are committed to conducting business ethically, responsibly, and sustainably. We expect the same commitment from all our suppliers, contractors, and business partners (collectively referred to as "Suppliers"). This Supplier Code of Conduct sets forth our expectations in the areas of labor, health and safety, environmental responsibility, ethics, and sourcing.

All Suppliers must comply with this Code and all applicable laws and regulations in the countries in which they operate. Compliance with this Code is a condition of doing business with Tricom Networks Inc.

2. Labor and Human Rights

Suppliers must uphold the highest standards of human rights and fair labor practices:

- **Freely Chosen Employment:** No forced, bonded, indentured labor or involuntary prison labor is allowed.
- **Child Labor:** Suppliers must not use child labor. Workers must meet the minimum age for employment as defined by local laws or 15 years, whichever is greater.
- **Non-Discrimination:** Suppliers must provide a workplace free of harassment and unlawful discrimination.
- **Working Hours:** Workweeks must not exceed the maximum set by local law, and overtime must be voluntary.
- **Wages and Benefits:** Compensation must meet or exceed legal requirements and provide for workers' basic needs.
- **Freedom of Association:** Suppliers must respect workers' rights to associate freely, form or join labor unions, and bargain collectively.

3. Health and Safety

Suppliers must provide a safe and healthy work environment that minimizes the risk of injury and exposure to health hazards:

- Maintain compliance with all occupational health and safety laws.
- Provide clean and accessible restrooms, potable water, and sanitary facilities.
- Implement procedures for managing emergency situations.
- Conduct regular safety training and drills.
- Protect workers from chemical, biological, and physical hazards.

4. Environmental Responsibility

Suppliers must operate in an environmentally responsible and resource-efficient manner:

- **Compliance:** Follow all applicable environmental laws and regulations.
- **Pollution Prevention:** Reduce or eliminate waste, emissions, and discharges.
- **Resource Efficiency:** Conserve natural resources and energy.
- **Chemical Management:** Identify and safely manage hazardous substances.
- **Climate Action:** Track and reduce greenhouse gas (GHG) emissions where feasible.

5. Ethical Business Conduct

Suppliers must conduct business with integrity and transparency:

- **Anti-Corruption:** Prohibit all forms of bribery, corruption, extortion, and embezzlement.
- **Fair Competition:** Uphold fair business standards and compete ethically.
- **Data Privacy and IP Protection:** Protect confidential information, including personal and proprietary data.
- **Accurate Reporting:** Maintain truthful and accurate business and financial records.
- **Conflict of Interest:** Disclose any relationships or activities that may conflict with Tricom Networks Inc.'s interests.

6. Responsible Sourcing Policy

At Tricom Networks Inc., we are committed to ensuring that our sourcing practices promote ethical labor, environmental sustainability, and conflict-free materials. Our suppliers must comply with the following principles:

6.1. Responsible Raw Material Sourcing

- Suppliers shall exercise due diligence on the source and chain of custody of materials supplied, including tin, tungsten, tantalum, gold, cobalt, and other minerals commonly associated with conflict and human rights abuses.
- Tricom Networks Inc. expects suppliers to support the sourcing of minerals from audited, conflict-free smelters and refiners.

6.2. Traceability

- Suppliers must maintain appropriate records and demonstrate full transparency in their sourcing practices upon request.
- Where required, suppliers must provide documentation to Tricom Networks Inc. using industry-standard tools such as the Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template (CMRT).

6.3. Social and Environmental Criteria

- Suppliers must evaluate and select their own sub-suppliers based not only on cost and quality but also on their compliance with social, ethical, and environmental standards.
- Tricom Networks Inc. gives preference to suppliers who integrate sustainability and fair labor practices into their operations and those of their supply chain.

6.4. Monitoring and Improvement

- Tricom Networks Inc. reserves the right to conduct audits or assessments to verify compliance with this sourcing policy.
- Non-compliance may result in corrective action requirements or, in severe cases, termination of the business relationship.

7. Implementation and Compliance

- Suppliers must provide training to ensure employees understand and comply with this Code.
- Tricom Networks Inc. reserves the right to assess suppliers' compliance, including through on-site audits, documentation review, and third-party assessments.
- Suppliers are expected to cooperate fully with such assessments and take prompt corrective action where deficiencies are found.

8. Reporting Concerns

Suppliers and their employees may report violations or concerns regarding this Code confidentially through Tricom Networks Inc.'s Ethics and Compliance dept. 951-698-4900 or email mreeder@tricomnetworks.com

Retaliation against any individual for reporting a concern in good faith is strictly prohibited.

9. Acknowledgment

By doing business with Tricom Networks Inc., the Supplier agrees to comply with the principles in this Supplier Code of Conduct and ensure its own supply chain upholds these standards.