



353 Ivyland Road, Warminster, PA 18974-2205 USA  
ThermOmegaTech.com • 1-877-379-8258

## Code of Conduct:

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ThermOmegaTech, Inc. is a leader in the design and manufacture of self-actuating thermostatic temperature control technology. ThermOmegaTech, Inc. serves a variety of industries, creating solutions for a wide range of applications, worldwide.

ThermOmegaTech, Inc. has developed the following Code of Conduct, which embodies how we conduct business as an organization – responsibly, fairly and in accordance with various regulations we are subject to in the variety of industries we service. Internal and external business decisions are made with our core traits in mind: Integrity, Unselfishness and Justice. ThermOmegaTech, Inc. takes reasonable measures to ensure our employees, suppliers and business partners acknowledge and conduct business in accordance with these principles.

In this context, ThermOmegaTech, Inc. places particular emphasis on:

### 1. Free and Fair Competition:

- a. ThermOmegaTech is committed to free and fair competition, ensuring dealings with business partners, customers and suppliers are in compliance with relevant legal regulations.

Free competition among market participants is subject to special protection and regulation under anti-trust and competition laws. These legal regulations prohibit companies from making arrangements or exchanging benefits that may affect prices, terms of sale or free and fair competition in general.

- b. To protect ThermOmegaTech from suspicion of illegal conduct, employees must refrain from the following:
  - i. Direct or indirect discussions, contacts or exchange of information with competitors regarding factors relevant to pricing, production output, capacities, profits, margins or cost;
  - ii. Discussion or contact with customers or suppliers that could result in restriction of trade and/or exclusion of other competitors from the industry;
  - iii. Actions in conflict with good commercial practices that can be harmful to competitors' interests or competitors' reputation.
- c. ThermOmegaTech requires employees to treat assets, intellectual property and trade secrets of the company, its business partners, customers and suppliers in accordance with established proprietary information protocols.



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## **2. Prevention of Corrupt Practices:**

- a. ThermOmegaTech commits itself to dealing fairly and at arms' length, and disavows any type of corrupt business practice or conduct with the potential to harm any company.
- b. Employees may grant only those benefits, favors or gifts considered socially appropriate. "Socially appropriate" corresponds to activities that are customary in the industry and are not likely to influence business decisions – this includes, but is not limited to business meals, promotional gifts, and other low value gratuities that are considered courtesies of a given country.

If an employee is unsure about the social propriety of granting a benefit, favor or gift, their supervisor must be consulted. These rules are equally applicable whether the business relationship in question is with a private person, company or a private or public entity.

## **3. Conflict of Interest**

- a. ThermOmegaTech's employees must act in the interest of the company. Employees have an obligation to make decisions based solely on objective criteria and their professional judgement. Decisions must never be improperly influenced by financial or other personal interests or relationships.

## **4. Social Behavior and Non-discrimination:**

- a. ThermOmegaTech employees have the right to a pleasant workplace where they are free from discrimination, in accordance with the ThermOmegaTech harassment and discrimination policies referenced in the Employee Handbook.
- b. ThermOmegaTech suppliers are selected through a consistent process documented in the company's Quality Management System (QMS). Although small and minority centric businesses are identified in the selection process, this is not viewed negatively – suppliers are selected based on ability to provide acceptable product for ThermOmegaTech requirements.
- c. ThermOmegaTech promotes exceptional Social Behavior by members of the leadership team's involvement in/participation with external groups meant to promote growth and development of other small and medium sized businesses – these external groups include, but are not limited to the Delaware Valley Industrial Resource Center (DVIRC) and the Mid-Atlantic District Export Council.

ThermOmegaTech also encourages employees to participate in company-sponsored internal and external outreach opportunities. Company sponsored outreach activities include, but are not limited to: Toys for Tots, Holiday themed food drives, or volunteering for causes of their choosing.



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## **5. Environmental Protection:**

- a. ThermOmegaTech employees are called upon to act in an environmentally conscientious manner, and to use materials and resources in a purposeful and economical manner.
- b. ThermOmegaTech engages in various environmental initiatives with the intent of minimizing the environmental footprint left by the company. These initiatives include solar panels that provide 75% of the power utilized in the facility. Other environmental initiatives consist of transition to energy efficient lighting throughout the facility, implementation of a Chemical Waste Disposal program and collecting/recycling waste generated in the manufacturing operation. A regular part of ThermOmegaTech employee training includes training to procedures – these procedures are also subject to Continuous Improvement initiatives, which drive further reduction of waste and increase of efficiency in the operation.

## **6. Protection and Safety of Customers and Employees:**

- a. The mission of ThermOmegaTech is to provide its customers with high quality thermostatic control solutions for various systems and applications in an array of industries. ThermOmegaTech complies with safety regulations established in the Corporate Safety Manual, fully ensuring workplace health and safety.

## **7. Fair Working Conditions**

- a. ThermOmegaTech strives to provide fair working conditions, acknowledges human rights and does its part to see they are respected. In particular, ThermOmegaTech is committed to observing the regulations publicized by the International Labor Organization (ILO), offering its employees fair compensation and limiting working hours.

In this context, ThermOmegaTech explicitly rejects any form of child labor, forced labor, human trafficking, or inappropriate or forbidden disciplinary practices, such as corporate punishment.

## **8. Applying The Code of Conduct:**

- a. ThermOmegaTech actively promotes compliance with the present Code of Conduct and works to ensure its principles are effectively implemented by providing corresponding training on this policy. ThermOmegaTech offers several channels for asking questions or raising concerns on issues covered by this Code of Conduct.

Generally, the employee's supervisor or manager will be in the best position to resolve any questions or concerns. However, they are not the only available options – other resources to pose questions or issues include: other managers in the organization, members on the executive leadership team, as well as Human Resources.



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ThermOmegaTech will maintain confidentiality of all reports to the greatest extent possible, consistent with resolution of the issues and in compliance with applicable law. No employee who suspects a violation and reports it in good faith will be subject to retaliation or any other negative impact for making such a report. Reporting in “good faith” means the employee has provided all the information in their possession and believes it to be true. ThermOmegaTech wishes to ensure that no employee will be penalized for having decided to report a (suspected) breach or to participate in an investigation of a report and that all local data protection laws will be respected for all employees involved in any allegation/report regarding breaches of the Code of Conduct.

- b. ThermOmegaTech takes reasonable action to ensure its business partners, customers and suppliers share its understanding of this Code of Conduct and that they, too, will act accordingly.
- c. The Code of Conduct and principles contained within will be overseen by the ThermOmegaTech Director of Compliance and Quality, who is also assigned the billet of Corporate Ombudsman. Violations of any section of this policy will be addressed by the **Director of Compliance and Quality**, as well as **Human Resources**. Audits of this program will be conducted annually as part of the Corporate Internal Audit schedule.

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ThermOmegaTech’s Code of Conduct serves as the basis for respective business relationships, social responsibilities and environmental mindfulness. ThermOmegaTech works on the premise that its business partners, customers and suppliers will also strive to act in a manner compliant with all relevant regulations and legal requirements. ThermOmegaTech trusts and takes reasonable action to ensure its business partners, customers and suppliers will also adhere to the concepts in this Code of Conduct in any business dealing with ThermOmegaTech.

ThermOmegaTech reserves the right to update and revise the Code of Conduct at any time in the future. Updated versions of the Code of Conduct will supersede previous versions.

James F. Logue, Jr

A handwritten signature in blue ink that reads "James F. Logue, Jr".

President & Chief Executive Officer

February 2022