

Laird Technologies

Supplier Code of Conduct

2011

(Revised May 26, 2011)

1.0 Purpose/Scope:

- 1.1 Laird Technologies expects all employees and suppliers to comply with our Global Code of Conduct regardless of local business practices or social customs. We take compliance by our employees and suppliers with our Code of Conduct very seriously.

2.0 Responsibilities:

- 2.1 As Laird Technologies suppliers, you are responsible to ensure that any current or new employees or agents of your corporation that interact or do business with Laird Technologies understands our expectations and standards. Suppliers are responsible to ensure their employees and vendors are aware of Laird Technologies' business conduct and ethics expectations and ensure they follow them. As our supplier, you will be expected to review and acknowledge your company's compliance to these standards annually. You are expected to report any violations of these policies to Laird Technologies promptly whether they are your employees or vendors and / or Laird Technologies employees. Confidentiality will be strictly maintained.

3.0 Standards:

3.1 GENERAL BUSINESS PHILOSOPHY

Laird Technologies' general business philosophy related to doing business with external partners is the following:

- Strict Compliance With the Law
- Respect for Competition
- No Actual or Perceived Conflicts of Interest

Laird Technologies also requires its suppliers to meet our ethical and legal expectations. These expectations are as follows:

- Compliance with Laird Technologies Standards of Business Conduct
- Compliance with the Electronics Industry Supply Chain Code of Conduct (EICC) in its entirety including its elements related to Labor, Health & Safety, Environment, Management System and Ethics.
<http://www.eicc.info>

3.2 KEY STANDARDS OF BUSINESS CONDUCT WITH SUPPLIERS--SUMMARY

3.2.1 Family Members Doing Business with Laird Technologies employees

Laird Technologies employees may not engage in transactions on behalf of the company with suppliers who are family members or have a substantial beneficial interest where they serve as a trustee or in fiduciary capacity.

3.2.2 Suppliers must sign Laird Technologies' Non Disclosure Agreement (NDA)

A prerequisite to do business with Laird Technologies is accepting and signing a copy of our NDA as well as other relevant required commercial agreements. This document must be signed and agreed before any confidential technical or business information can be exchanged between companies.

3.2.3 Business Awards and 'Kickbacks'

Laird Technologies treats all potential suppliers fairly, openly and considers all interested/qualified suppliers when we purchase goods or services based on their ability to meet our business needs. We demand fair, transparent negotiation and bidding processes, conducted in the utmost professional manner when working with our procurement and sourcing representatives.

Under no circumstances are suppliers allowed to offer 'kickbacks' or rebates to try to entice a Laird Technologies employee to choose a supplier nor should any employee of Laird Technologies request such treatment from you in order to earn our business. A kickback refers to any money, fee, commission, credit, gift, gratuity, or item of value or compensation of any kind, which is provided, directly or indirectly, for the purpose of improperly obtaining or rewarding favorable treatment in connections with a contract or relationship from Laird Technologies.

3.2.4 Business Gifts

Please be aware that all Laird Technologies' employees are required to adhere to strict policies related to gifts and entertainment with suppliers.

3.2.5 International Corruption Law and EICC

Our employees are required to abide by the U.S. Foreign Corrupt Practices Act (FCPA) and United Kingdom's Anti Bribery Act 2010 guidelines. We expect our suppliers to abide by these same guidelines. Laird expects its suppliers to meet the standards of the Electronics Industry Supply Chain Code of Conduct (EICC) and suppliers will be periodically audited with respect to their compliance. Any such persuasive tactics not in compliance with such policies by any supplier with our employees will result in immediate termination of our business relationship.

3.2.6 Transportation

Compliance to Laird Technologies' Standard Operating Procedure Worldwide Transportation Routing Guide is the accountability of the supplier.

The purpose of this Routing Guide is to outline the minimum shipping requirements including, but not limited to IncoTerms, heavyweight (≥ 68 kilos) and small parcel (< 68 kilos) shipment procedures, mode (ocean, air, & trucking), preferred carrier and forwarders governed by lane assignment, and expedited freight policy.

Laird Technologies reserves the right to refuse payment on excess freight and accessorial charges for failure to comply with its routing instructions. Excess freight and accessorial charges associated with non compliance of Laird Technologies' routing guidelines will be charged back to the supplier as a penalty.

3.2.7 Supply Chain Security

Laird Technologies is committed to assessing, managing, and improving its supply chain security. It is Laird's intent to work with their business partners as a team to improve supply chain security practices. We expect your company will comply with the U.S. Customs "Customs Trade Partnership Against Terrorism" (C-TPAT) minimum security requirements. Further information and updates to these requirements can be found at [U.S. Customs C-TPAT Program](#).

3.2.8 Trade Compliance

It is Laird's policy to fully comply with all applicable import, export, customs and trade control and regulations, licensing requirements and other relevant U.S. and international laws. Suppliers are required to adhere to all governmental trade compliance import and export regulations involving Laird Technologies' shipments.

3.2.9 Human Rights In Minerals Mining in Central Africa (Conflict Metals)

Human rights violations related to the trade in minerals from the conflict zones in the Democratic Republic of Congo (DRC) are a focus of Laird's supply chain and environmental responsibilities. Laird Technologies requires its suppliers not to source gold, tin, tantalum and tungsten metals from the conflict zones in the Democratic Republic of Congo (DRC). We expect suppliers to conduct their worldwide operations in a manner that does not result in labor or human rights violations, including operations that contribute to the direct financing of armed conflict.

3.3 HOW TO REPORT AN ETHICS CONCERN TO LAIRD TECHNOLOGIES

- 3.3.1 To report a questionable behavior or possible violation of the Supplier Code of Conduct, Laird Technologies has a variety of resources available to assist you as our supplier. You are encouraged to work with your primary Laird Technologies contact in resolving a business practice or compliance concern. However, Laird Technologies recognizes that there may be times when this is not possible or appropriate.

3.3.2 Reporting of Questionable Behavior and / or Possible Violations

- When reporting a concern, suppliers or vendors should indicate that they are reporting on behalf of “Laird Technologies” rather than their supplier company name.
- Provide specific information about which Laird Technologies site or organization is associated with the concern.
- Your concern will be held in complete confidence, and you can remain anonymous if you choose. However, providing contact information will help us investigate your concern.
- The numbers available for you to report a concern are the following:

International Confidential Toll-Free Telephone Numbers

Country	Free Phone Numbers	Country (continued)	Free Phone Numbers (continued)
Argentina	0800 666 2603	Latvia	80002670
Australia	1800 121 889	Lithuania	880030444
Austria	0800 281700	Luxembourg	8002 4450
Bahrain	80004475	Monaco	80093690
Belgium	0800 71025	Malaysia	1800 807055
Bulgaria	008001104474	Malta	800 62404
Brazil	0800 891 8807	Mexico	01800 123 0193
Canada	1888 268 5816	Netherlands	0800 022 9026
Chile	12300200412	New Zealand	0800 443 816
China (Universal)	00 800 3838 3000	Norway	800 14870
Columbia	01800 944 4796	Philippines	1800 1442 0076
Costa Rica	08000 440101	Poland	00800 441 2392
Croatia	0 800 222 845	Portugal	800 880 374
Cyprus	800 95207	Puerto Rico	1866 293 1804
Czech Republic	800 142428	Romania	08008 94440
Denmark	8088 4368	Russia (restricted coverage)	810 800 2058 2044
Eire	1800 567 014	Saudi Arabia	800 844 0172
Egypt	0800 000 00 23	Singapore	800 4411 140
Estonia	8000044265	Slovakia	0800 004461
Finland	0800 116773	Slovenia	0800 80886
France (New)	0800 900 240	South Africa	0800 990520
Germany	0800 182 3246	Spain	900 944401
Greece	00800 441 31422	Sri Lanka	011 244 5413 (omit 011 if dialing from Colombo)
Hawaii	1866 293 2604	Sweden	0200 285415
Hong Kong	800 930770	Switzerland	0800 563823/0800 563012
Hungary	06800 14863	Taiwan	0080 104 4202
Iceland	8008279	Thailand	001 800 442 078
India	000 8004401286	Turkey	00800 4463 2066
Indonesia	001 803 0441 1201	UK	0800 374199
Israel	180 944 6487	United Arab Emirates	80004413873
Italy	800 783776	USA	1877 533 5310
Japan	00531 78 0023	Venezuela	0800 100 3199
Korea (South)	00308 4420074		

You may also send an email to the Director of Compliance by emailing the Business Conduct and Compliance alias, buscond@lairdtech.com. Or, if required, a letter to the Director of Compliance at Laird Technologies, 16401 Swingley Ridge Road, Suite 700, Chesterfield, MO 63017 USA.

Laird Technologies will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or has reported questionable behavior and / or a possible violation.

Laird Technologies Website Access for More Information:

<http://www.lairdtech.com/About-Laird-Technologies/Policies-And-Documents/Doing-Business-With-Laird/As-A-Supplier/>



**Laird Technologies Business Addendum to
MSA, SPA or Purchase Order Terms and Conditions**

Suppliers wishing to conduct or continue to do business with Laird Technologies must sign, or electronically accept, acknowledgement they have read the Laird Technologies Supplier Code of Conduct; and in doing so, certify that they intend to comply with them and notify those employees involved in conducting business with Laird Technologies.

_____**(Supplier Name)** acknowledges they have received, read and accept Laird Technologies' Supplier Code of Conduct and will notify all current and new employees engaging in business with Laird Technologies regardless of supplier entity location(s), employee function or geographic region(s).

Supplier Name: _____

Laird Account Representative Contact: _____

Supplier Address: _____

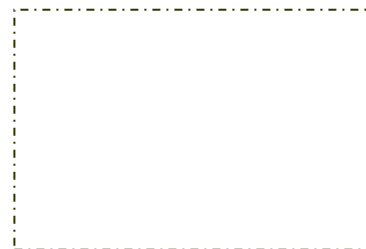
Supplier City, State, County, Postcode: _____

Phone Number(s): _____

Email Address: _____

Signed: _____
Name & Title

Dated: _____



COMPANY SEAL/CHOP

Sign and return executed Addendum via email to kym.hodgson@lairdtech.com.