



39730 Eureka Drive, Newark, CA 94560

Supplier Practices Guidelines

Effective November, 2018

Introduction:

UNIGEN is committed to the highest standards of social and environmental responsibility and ethical conduct. We strive to provide safe working conditions, treat employees with dignity and respect, act fairly and ethically, and use environmentally responsible practices whenever we make products or perform services for our customers. UNIGEN expects the same from our suppliers.

UNIGEN expects its suppliers to manage their business dealings in accordance with all applicable government regulations in all countries where UNIGEN conducts business. It is imperative that all suppliers use sound judgment and act in accordance with these guidelines. UNIGEN will only conduct business with suppliers who demonstrate a high degree of ethical behavior in their relations with UNIGEN.

Ethics: Business Meals, Gifts, and Entertainment

Suppliers may offer customary business amenities such as nominal gifts, meals, and entertainment to UNIGEN employees, provided the expenses do not exceed these guidelines, are not prohibited by law, and do not create a perception of conflict of interest. If you are unsure of the appropriateness in offering a gift or an invitation to a specific entertainment event, contact your UNIGEN Supply Chain or Materials Director. Requirements include:

- Gifts in cash or cash equivalents are prohibited.
- Giving (offering) any payment, service, or gift, directly or indirectly, to a UNIGEN employee is strictly prohibited. This prohibition covers anything of value, e.g. cash, products, meals (except below), lodging, transportation, loans, prizes, special discounts, paid vacations, free or discounted stocks, gift certificates, or tickets to events, etc.
- Gifts or entertainment that would embarrass UNIGEN employees or UNIGEN customers is prohibited.
- Approval from UNIGEN Supply Chain or Materials Directors is required in order for any UNIGEN employee to accept a business meal or entertainment above US\$30 of value. The total value to any UNIGEN employee in any calendar year should not exceed US\$100.
- A supplier may not give (offer) any UNIGEN employee or employee's family member anything with a value of more than US\$20. A supplier may only offer (give) a gift when it is customarily offered to others having a similar relationship with the supplier.



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Ethics: Conflict Minerals

UNIGEN Statement on Conflict Minerals

On August 22, 2012 the Securities and Exchange Commission (SEC) published the regulations implementing the conflict minerals reporting obligations of Section 1502 of the U.S. Dodd-Frank Wall Street Reform Act. "Conflict Minerals" refers to minerals or other derivatives mined in the Democratic Republic of the Congo (DRC) and in the adjoining countries where revenues may be directly or indirectly financing armed groups engaged in civil war, resulting in serious social and environmental abuses. UNIGEN, although not a public company governed by the SEC, is committed to a socially responsible supply chain that, among other requirements, is Conflict Free. To this end, we continue working with our supply chain to strengthen compliance and ensure only "DRC Conflict Free" materials are used.

UNIGEN does not purchase tin, tantalum, tungsten or gold (3T&G) directly from smelters or mines. Further, there are many supply chain layers that separate us from the smelters and mines from which these metals are sourced. Consequently,

- UNIGEN expects our suppliers to source from socially responsible suppliers. We prefer to source from suppliers who have confirmed non-conflict sources, even if those sources do come from the DRC or adjoining countries.
- UNIGEN requires our suppliers to determine the sources and conflict status of the 3T&G supplied to UNIGEN and to certify the smelters or mines from which the metals were obtained.
- UNIGEN expects suppliers to pass these requirements on to their supply chain.

Labor: Suppliers are expected to follow all local laws regarding:

- Equal Employment Opportunity
- Anti-Discrimination
- Harassment Prevention
- Working Hours
- Employees under the minimum working age.

Health and Safety: Supplier recognizes that in addition to minimizing the incidence of work related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Supplier also recognizes that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace. Areas to address are:

- Health and Safety Management System



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- Occupational Safety
- Emergency Preparedness
- Occupational Injury and Illness
- Industrial Hygiene
- Physically Demanding Work
- Machine Safeguarding
- Sanitation, Food, and Housing

ENVIRONMENTAL: Unigen recognizes that environmental responsibility is integral to producing world-class products. In manufacturing operations, Supplier will minimize adverse effects on the community, environment and natural resources while safeguarding the health and safety of the public.

The environmental standards are:

- Environmental Management System (ie ISO 14001 or equivalent)
- Environmental Permits and Reporting
- Hazardous Substances, Wastewater, and Solid Waste Handling and Disposal
- Air Emissions
- Product Content Restrictions
- Materials Disposal

Unigen Contact: If you have any questions or concerns with this Guideline, please contact our office at Unigen HQ, 510-896-1818, and ask for the Director of Supply Chain Operations.