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POLICY PURPOSE

The Purpose of this policy is to convey the importance that Data Center Systems places in conducting our business in an Ethical, Legal, Safe, and Socially Responsible Manner and ensuring that our suppliers do the same. DCS expects our suppliers to share in this commitment, therefore we have established this Supplier Code of Conduct.

HISTORY, GOALS AND ETHICS

Recognizing a fiber-based future for data transmission, Kevin Ehringer founded Optical Cabling Systems in 1994. In 2002, the company evolved into Data Center Systems (DCS) to improve upon IBM’s concept of structured connectivity or Fiber Transport System. Since that time, Data Center Systems has been responsible for providing reliable, scalable, high-performance connectivity to some of the largest data centers in the world, equipping them to serve their customers effectively and without interruption.

Mission: To be the trusted advisor for storage and network connectivity solutions by combining our unique products, technical expertise, and services that exceed our customers’ expectation.

Vision: To become the world-wide leader of storage and network connectivity products/solutions for large enterprise data centers.

Purpose: To create a company, and a culture, that changes the lives of our coworkers, customers, and community.

Our Core Values: CHIPID – Customer Focus, Humility, Innovation, Passion, Integrity, Dedication

At Data Center Systems, we couldn’t have built a successful company without the support of our clients and business partners. The way we conduct our business at DCS is as important as the products and services that we provide.

At Data Center Systems, we are wholeheartedly committed to conducting our business with unquestionable honesty, integrity, and professionalism and in compliance with all applicable laws, rules, and regulations. Likewise, we expect the same out of our suppliers and business partners.

At Data Center Systems, our Supplier Code of Conduct contains the same principles by which we govern ourselves and we expect our suppliers and business partners to commit to the same values and hopefully communicate throughout their supply chains as well.

BUSINESS ETHICS

We expect suppliers to conduct their business:

- Ethically and responsibly,
- In full compliance with all applicable federal, provincial, state, local laws, and regulatory requirements; and in full compliance with this Code.

Anti-corruption and anti-bribery

We expect our suppliers to follow all laws and regulatory requirements regarding bribery and corruption. Suppliers must not engage in any form of corruption. This includes bribes, kickbacks, facilitation payments and extortion.

TO ORDER, CONTACT YOUR SALES REP, OR CALL US DIRECTLY: 972-620-4997 | salesupport@datacentersystems.com | datacentersystems.com



Anti-money laundering

Our suppliers may not engage — directly or indirectly — in any form of money laundering. They may not conduct business that violates the anti-money laundering laws. This includes accepting, concealing, converting and/or transferring any funds obtained from criminal activities, including, and related to terrorist financing.

Anti-trust and competition

Our suppliers may not conduct business for Data Center Systems that isn't compliant with anti-trust and fair competition laws and regulations in the jurisdictions they operate.

Conflicts of interest

Our suppliers must avoid circumstances, situations, or relationships that could improperly influence business decisions. They must avoid all appearances of potential conflicts of interest. Suppliers must immediately disclose relationships, associations, or activities that can create actual or potential conflicts of interest.

Fraud prevention

Our suppliers must not participate in any form of fraudulent or dishonest business activities. This includes:

- alteration, forgery or falsification of company documents or information,
- misuse or removal of records,
- misappropriation of company assets; and,
- theft or embezzlement.

Gifts and entertainment

Data Center Systems expects that suppliers will not offer any Data Center Systems employee gifts, entertainment or any other advantage that could lead to improper advantage or preferential treatment. Improper gifts, entertainment and any advantages received could result in Data Center Systems ending the relationship with the supplier.

Privacy and information security

Data Center Systems commits to respecting privacy and confidentiality. We expect suppliers to comply with all laws and regulatory requirements regarding privacy and information security requirements. These include appropriate access to and/or handling of DCS confidential information. Suppliers must safeguard and not use or disclose DCS confidential information without permission from DCS. We expect suppliers to have adequate controls in place to protect confidential information of Data Center Systems.

Insider trading

Suppliers must have policies, procedures, and practices in place to prevent the use of confidential information for the purposes of trading company securities.

Corporate property

Suppliers may have access to DCS property. Suppliers must use DCS property in a responsible manner, solely for authorized business purposes. DCS corporate property includes hardware, software, websites, e-mail, telecommunications, internet access, records, documents, supplies and intellectual property. Suppliers may not use Data Center Systems name, trademark, or logos without our consent.

HUMAN RIGHTS AND LABOR STANDARDS

Child Labor

Data Center Systems does not tolerate any form of child labor in our supply chain. DCS expects our suppliers to prevent child labor in their operations and encourages our suppliers to participate in industry efforts aimed at the elimination of such practices wherever they exist in the supply chain.

Forced Labor and Human Trafficking

Data Center Systems does not tolerate any form of abusive or illegal labor in our supply chain such as forced labor or human trafficking. Data Center Systems requires that all labor in its supply chain be voluntary and that workers are allowed freedom of movement. All forms of forced labor and human trafficking are prohibited including but not limited to any form of prison, slave, bonded or forced indentured labor.

Freedom of Association and Collective Bargaining

Data Center Systems respects the rights of employees to freedom of association and collective bargaining across its operations and supply chain. Workers have the right to form, join or not join trade unions or other organizations of their choosing and collectively bargain without fear of discrimination, retaliation, harassment, or intimidation. In cases where freedom of association is restricted by local law, alternative means of freedom of association will not be obstructed.

Non-Discrimination

Data Center Systems does not tolerate any form of discrimination in the workplace or in our supply chain. We are committed to diversity and inclusion in the work environment. Any discrimination based on race, color, creed, religion, sex, national origin, disability, age, sexual orientation, gender identity, genetic information or any other characteristic protected under federal, state, or local law (referred to as "protected status") is not acceptable or tolerated in our workplace or supply chain.

Hiring and employment decisions in our workplace and supply chain, including those relating to compensation, benefits, promotion, training and development, discipline, and termination should always be based solely on the worker's skill, ability, experience, and performance.

Harassment

Data Center Systems does not tolerate any form of harassment in our workplace or Supply Chain.

All workers should always be treated with dignity and respect and should never be subjected to any form of unethical treatment, threats of violence, or other forms of physical, mental, sexual harassment or disrespectful conduct based on race, religion, color, gender, gender identity, gender expression, sexual orientation, national origin, ancestry, physical or mental disability, medical condition, genetic information/characteristics, marital status/registered domestic partner status, age, military or veteran status or any other basis protected by federal, state, or local law or ordinance or regulation.

Data Center Systems encourages our employees to report any incidents of harassment, discrimination, retaliation, or other prohibited conduct forbidden by this policy

immediately so that complaints can be quickly and fairly resolved. Likewise, we expect all our suppliers to provide similar methods of reporting and addressing reports of harassment within their organizations.

Working Hours, Wages and Benefits

Data Center Systems is committed to upholding all federal and state laws regarding compensation, working hours and benefits and expect our suppliers to do the same for their employees.

We expect our suppliers to compensate their employees on time with fair wages that are at least equal to applicable minimum wage laws. Suppliers shall ensure that work schedules and rest periods are consistent with applicable local legal requirements. Work hours and schedules should not be excessive and negatively impact employees' health and safety.

WORKERS HEALTH & SAFETY

Data Center Systems believes in providing a safe and healthy work environment for all employees and expects our suppliers to do the same. Workers in our supply chain must have the right to refuse and report unsafe or unhealthy working conditions regardless of role, title, or responsibility.

All workers should be trained on the appropriate occupational health and safety policies and procedures, including evacuation procedures. Workers must be provided with appropriate personal protective equipment and instructed on appropriate use of that equipment.

ENVIRONMENT AND SUSTAINABILITY

Protecting our shared environment is of fundamental importance to Data Center Systems, as it is to our employees, customers, and suppliers. To support this common goal, we expect our suppliers to:

- Comply with applicable local, state, and federal environmental regulations and codes of practice,
- Work to continually improve the environmental performance of products and processes,
- Protect the health and safety of their employees, surrounding communities and ecosystems; and
- Use natural resources, including raw materials, energy, and water, as efficiently as possible.

We expect our suppliers to achieve these commitments by:

- Raising awareness of environmental issues,
- Working collaboratively with customers, suppliers, and the surrounding community on environmental issues,
- Minimize waste by evaluating operations and ensuring they are as efficient as possible,
- Actively promote recycling both internally and amongst its customers and suppliers; and
- Monitoring progress and review environmental performance.