



## CODE OF CONDUCT

Amended June 2016

*Reflex is committed to conducting our business in accordance with the highest standard of business ethics and respect for human rights. We require our suppliers, licensees, distributors and other business partners to meet these high standards. We appreciate that other countries have different cultural, legal and ethical systems. However, the Reflex Code states that any facilities we use, whether owned by the company or our contractors, licensees or other business partners must always satisfy certain basic requirements.*

### **Compliance with Law:**

Reflex requires that all facilities operate in compliance with the requirements of applicable law.

### **Health and Safety:**

Conditions throughout the facilities must be safe, clean and meet or exceed requirements of all applicable laws and regulations regarding health and safety. Workers must also be trained and equipped to perform their jobs safely.

### **Child Labour:**

No person shall be employed at an age younger than the age for completing compulsory schooling in the country of manufacture, or the age consistent with International Labour Organisation guidelines, whichever is greater.

### **Forced Labour:**

The use of forced or compulsory, indentured, or bonded labour is prohibited.

### **Harassment or Abuse:**

Facilities must treat all employees with respect and dignity and should have procedures in place to protect employees from physical, sexual, psychological or verbal abuse. In addition, facilities may not use monetary fines as a disciplinary practice.

### **Discrimination:**

Discrimination in hiring, pay, promotions, discipline, termination or other terms and conditions of employment based on personal characteristics, beliefs or other legally protected criteria, is prohibited.

### **Freedom of Association:**

Reflex recognises and respects the rights of employees to freedom of association and collective bargaining and requires that all facilities recognise and respect the same.

### **Environmental Compliance:**

Reflex requires compliance with all local and international laws protecting the environment, including proper storage and disposal of hazardous substances. In addition, business

should be conducted in a manner that minimises all waste and energy consumption and maximises recycling.

**Subcontractors:**

Facilities will not utilise subcontractors in the manufacturing of Company products or components without the Company's prior written approval and only after the subcontractor has agreed to comply with this Code of Conduct.

**Customs Compliance:**

Facilities will comply with all applicable customs laws and establish and maintain programmes to safeguard against the illegal transshipment of products.

**Security:**

Facilities will maintain security procedures to guard against the introduction of non-manifested cargo (drugs and other contraband) into shipments of our products.

**Posting Requirements:**

This Code of Conduct must be posted in a visible location accessible to all employees and visitors (in the appropriate local language).

**Record Keeping:**

Facilities must maintain complete and accurate records with respect to each of these elements to allow for verification of compliance with this Code of Conduct.

**Enforcement:**

Reflex employs internal, as well as third party auditors, to ensure compliance with this Code at all locations conducting business for Reflex. The Company maintains detailed records of all facilities' compliance with this Code of Conduct.

**Violations:**

To report suspected violations of this Code of Conduct, contact the Company at the registered address.

**Working Hours:**

Except in extraordinary business circumstances, employees shall

- (i) Not be required to work more than the lesser of
  - (a) 48 hours per week, and 12 hours overtime or
  - (b) The limits on regular and overtime hours allowed by the law of the country of manufacture

and

- (ii) Be entitled to at least one day off in every seven-day period. All overtime work shall be optional. Employers shall not require overtime on a regular basis and shall compensate all overtime work at a premium rate.

**Wages and Benefits:**

Reflex requires that employees be fairly compensated by providing wages, including overtime pay and benefits that meet or exceed all applicable laws and regulations.