

II-VI Code of Ethics and Supplier Responsibilities

At II-VI Incorporated it is each employee's responsibility to exercise sound business judgment and to act honestly and ethically. We are required not only to "do the job," but to "do it the right way." Doing it the right way goes past complying with laws and regulations. It means conducting ourselves with ethics and integrity in all that we do. Our Code of Ethics combines the values and standards of behavior that make II-VI a trusted and respected organization.

As such, we expect the same level of ethics, integrity and social responsibility from our Suppliers. Working together, we must meet the highest standards of business excellence that our customers expect from us.

Please read the following outline of expectations associated with each topic, print, sign the bottom of this form, scan and return it to:

William Rodriguez
Supplier Quality Manager
william.rodriguez@II-VI.com

Human Trafficking

II-VI is opposed to human trafficking and forced labor in any form. We are committed to working to mitigate the risk of human trafficking and forced labor in all aspects of our business. The US Government has a zero-tolerance policy regarding any Government employees and contractor personnel and their supply chains engaging in any form of trafficking in persons, defined to mean the recruitment, harboring, transportation, provision or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of involuntary servitude, bondage or slavery.

Suppliers shall enforce a similar policy internally as well as throughout their supply chain.

For more information please see:

https://www.acquisition.gov/far/html/52_222.html#wp1151848

<https://oag.ca.gov/sites/all/files/agweb/pdfs/sb657/resource-guide.pdf>

<https://www.federalregister.gov/documents/2015/01/29/2015-01524/federal-acquisition-regulation-ending-trafficking-in-persons>

Non-discrimination

Suppliers shall provide equal employment opportunity to applicants without regard to race, ethnicity, religion, color, sex, national origin, age, military veteran status, ancestry, sexual status, family structure, genetic information, or mental or physical disability, so long as the essential functions of the job can be performed with or without reasonable accommodation.

Conflict Minerals

Suppliers shall take steps to determine if their products contain conflict minerals (tin, tantalum, gold, and tungsten) and if so, implement supply chain due diligence processes to identify sources of these minerals and support efforts to eradicate the use of conflict minerals which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries.

For more information see:

<http://www.acq.osd.mil/dpap/dars/dfars/html/current/252225.htm#252.225-7009>

Environment

Suppliers shall operate in a manner that actively manages risk, conserves natural resources, and protects the environment.

Employee, Safety, & Health

Suppliers shall comply with applicable safety and health laws, regulations, policies, and procedures. Suppliers should provide for the health, safety, and welfare of their people, visitors, and others who may be affected by their activities.

Harassment

Suppliers shall ensure that employees may perform their work in an environment free from physical, psychological, and verbal harassment, or other abusive conduct.

Drug-Free Workplace

Suppliers shall maintain a workplace free from illegal drugs.

Reporting

Suppliers shall give employees access to an adequate avenue of raising issues or concerns without fear of retaliation.

Codes of Conduct & Sub-tier Suppliers

Suppliers should implement their own written code of conduct, and flow down the principles of a code of conduct to the entities that furnish goods and services to the supplier.

Gifts/Business Courtesies

It is our policy to earn our business as a result of our product quality and customer satisfaction. It is therefore not allowed to accept gifts or business courtesies of any nature from our suppliers, with the exception of very low value promotional items. We expect our suppliers to have the same type of policy in place.

Fair Competition/Anti-Trust

Suppliers shall conduct business in accordance with all applicable anti-trust or anti-competition laws and regulations.

Conflicts of Interest

Suppliers shall avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest when supplying products or services. In addition, this policy shall be flowed down to their sub-tier suppliers.

Export/Import Control

The subject of Export/Import control is critical to our customers. Because of this, our suppliers shall ensure that their business practices are in accordance with all applicable laws and regulations governing their export and import of domestic and foreign origin parts and components and related technical data.

Counterfeit Parts

Counterfeit parts are becoming more prominent as the market becomes globalized and violators seek more sophisticated ways to infiltrate. Suppliers shall implement any and all means available to them to ensure counterfeit parts and materials do not make their way into deliverable products.

Confidential/ Proprietary Information

Suppliers shall take proper care to protect all sensitive information, including confidential, proprietary and personal information.

Please print, fill out this form, scan and return it to: _____

William Rodriguez
Supplier Quality Manager
william.rodriguez@II-VI.com

Supplier Information:

I have read the II-VI Code of Ethics and Supplier Responsibilities and hereby state on behalf of (name of company):

will make every effort to comply with each statement and policy.

Name: _____

Signature: _____

Title: _____

Date: _____