



**MACHINE TOOL ENGINEERING**

2916 Hwy. 18 P.O. Box 94  
Charles City, IA 50616

Office: 641-228-4524

Fax: 641-228-6884

Website: [www.gomte.com](http://www.gomte.com)

Email: [info@gomte.com](mailto:info@gomte.com)



SMITHERS  
QUALITY ASSESSMENTS  
MTE  
AS9100D  
Cert # 19.304.6



SMITHERS  
QUALITY ASSESSMENTS  
MTE  
ISO 9001:2015 w/o  
Design Cert # 16.309.2

**This code of conduct applies to all businesses that provide products or services for Machine Tool Engineering, Inc. as we require suppliers and their employees to commit to this code of conduct as a condition of doing business.**

**General Responsibilities:**

Machine Tool Engineering suppliers must comply with the laws, rules, regulations. They are expected to be familiar with the business practices of their suppliers and subcontractors, and ensure they operate according to this code of conduct. Machine Tool Engineering may discontinue its relationship with suppliers who fail to comply with this code.

**Key Expectations:**

**CHILD LABOR**

In the absence of local law, suppliers may not employ workers under the age of 14. Workers under the age of 18 may not perform work likely to jeopardize their health, safety, or education.

**FORCED LABOR**

Suppliers must not facilitate or participate in human trafficking; used forced, involuntary, or slave labor, or purchase materials or services from companies using forced, involuntary, or slave labor. They must be able to certify that materials included in their products comply with the slavery and human trafficking laws of the country or countries in which they do business.

**CONFLICT MINERALS**

Suppliers are required to respond to information requests on the source and origin of conflict minerals in the parts, components or materials provided to Machine Tool Engineering, Inc. Suppliers are not allowed the use of tin, tantalum, tungsten and gold, including their derivatives, originating in the Democratic Republic of Congo or its surrounding countries on any Machine Tool Engineering, Inc. orders.

**HIRING AND EMPLOYMENT PRACTICES:**

Supplier's hiring practices must include verification of workers' legal right to work in the country and ensure that all mandatory documents, such as work permits, are available.

Machine Tool Engineering Suppliers are expected to support diversity and equal opportunity in their workplaces.

Suppliers must also prohibit discrimination based on race, color, gender, nationality, age, disability, union membership, maternity, sexual orientation, marital status, gender identity or expression.



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#### HARASSMENT:

Machine Tool Engineering suppliers must treat all workers with respect and dignity. They may not subject workers to corporal punishment, physical, sexual, psychological, or verbal harassment or abuse.

In addition, suppliers must provide an environment that allows employees to raise concerns without fear of retaliation.

Where it is allowed by law, suppliers should have a system that allows employees to anonymously report their concerns.

#### COMPENSATION AND WORKING HOURS:

Suppliers must comply with applicable wage and hour labor laws and regulations governing employee compensation and working hours. Suppliers should conduct operations in ways that limit overtime to a level that ensures a humane and productive work environment.

#### HEALTH AND SAFETY:

Suppliers must provide workers with a safe and healthy work environment. They should take proactive measures that support accident prevention and minimize health risk exposure. They must ensure their operations comply with all laws related to health and occupational safety.

#### ENVIRONMENT:

Suppliers are expected to conduct their operations in a way that minimizes the impact in natural resources and protects the environment, customers, and employees. They must ensure their operations comply with all applicable laws related to air emissions, water discharges, toxic substances, and hazardous waste disposal.

Throughout the world, laws and regulations (e.g. RoHS and REACH) prohibit or restrict certain substances and/or require manufacturers and suppliers to provide information about restricted substances in their products. Suppliers must, therefore, provide regulatory compliance declarations for identified products.

#### GIFTS AND GRATUITIES:

Suppliers must not offer gifts to Machine Tool Engineering employees. This includes gifts of nominal value. Although giving gifts is acceptable in some cultures, Machine Tool Engineering requests that suppliers respect its policy of not accepting gifts in order to further the business relation. It is only approved and accepted when suppliers support Machine Tool Engineering sponsored events in the form of donations for raffle or drawings.



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#### IMPROPER PAYMENTS:

Bribes, kickbacks, and similar payments are strictly prohibited. This ban applies even when local laws may permit such activity.

Employees, suppliers, and agents acting on behalf of Machine Tool Engineering are strictly prohibited from accepting or giving such considerations under any circumstances.

#### CONFIDENTIAL INFORMATION:

Proper management of confidential information is critical to the success of both Machine Tool Engineering and suppliers. Suppliers must protect all Machine Tool Engineering information, electronic data, and intellectual property with appropriate safeguards including protecting it from being received by non-US Citizens regardless of their work permissions in the United States.

Any transfer of confidential information must be executed in a way that secures and protects the intellectual property rights of Machine Tool Engineering and its suppliers. Suppliers may receive our confidential information only as authorized by a confidentiality or non-disclosure agreement and must comply with their obligations to not disclose the confidential information, to not use the information except as permitted by the agreement, and to protect the information from misuse or unauthorized disclosure. Our suppliers can expect Machine Tool Engineering to similarly safeguard their confidential information when authorization is provided to Machine Tool Engineering. Suppliers may not use the Machine Tool Engineering trademark, images, or other materials unless explicitly authorized.

#### SUPPLIER MANAGEMENT SYSTEM:

Suppliers are expected to have a management system that ensures they comply with applicable laws, regulations, and Machine Tool Engineering Policies; conform to this Supplier Code of Conduct; and identify and reduce operational risks related to this code. The system should also promote continuous improvement and compliance with changing laws and regulations.

#### SUPPLY CHAIN TRANSPARENCY:

Supply chain transparency is required to confirm compliance to this code of conduct. To monitor this, Machine Tool Engineering may request documentation, conduct onsite audits, review and approve corrective action plans, and verify implementation of corrective action.

#### COMMUNICATION:

Suppliers are expected to assist Machine Tool Engineering in enforcing this Supplier Code of Conduct by communicating its principles to their supervisors, employees, and suppliers. Vendors need to certify that each employee is individually aware of their responsibility with regard to the proper handling of ITAR controlled defense articles, technical data and defense services.



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#### CONTACT INFORMATION:

Any supplier may direct questions or comments about this code of conduct to his/her company representative or the company's owners.

#### Non-Compliance Reporting:

Violations of the Machine Tool Engineering Code of Conduct can be reported confidentially any of the following ways:

Telephone: 1-641-228-4524

Mail: Machine Tool Engineering, Inc.  
Attn: Code of Conduct Compliance  
PO Box 94  
Charles City, IA 50616