

# CODE OF CONDUCT

Continental Resources, Inc.

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## MESSAGE FROM THE CEO

Doing things right is one of our most important values at Continental Resources, Inc. and our affiliates (“ConRes”). We work hard every day to provide products and services that enhance the lives of people in our community, our country, and all over the world.

We are clear about what we mean when we talk about doing things right. Not only does it mean that we provide products that are well made, fairly priced and of exceptional quality, but it also means that every step we take in making those products is taken with ethics and integrity in mind. We source material only from suppliers who have impeccable human rights records, ensure our supply chain is of high integrity and monitor our entire operation for compliance with our code of conduct.

Doing things right is not an option at ConRes. Working here means making a commitment to uphold our company values and following the code of conduct outlined in this document.

Thank you for upholding our values and helping us to be the best product supplier we can be.

Mary Nardella

CEO

## BUSINESS ETHICS AND CONDUCT

The successful business operation and reputation of ConRes is built upon the principles of fair dealing and ethical conduct of our employees, customers, and business partners. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

The continued success of ConRes is dependent upon our customers' trust and we are dedicated to preserving that trust.

Employees owe a duty to ConRes, its customers, and business partners, to act in a way that will merit the continued trust and confidence of the public.

In general, the use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action the matter may be discussed openly with the ConRes Human Resource Department for advice and consultation.

### Employees Shall NOT:

- Violate safety regulations.
- Perform personal work on company time.
- Operate any machinery, tool or piece of equipment to which they have not been properly assigned.
- Display notices on bulletin boards or other company property without the consent of the Human Resource Department.
- Falsify any company records, timecards, vouchers, employment application or expense reports.

## SOCIAL MEDIA

Employees are allowed to associate themselves with ConRes when posting on social media sites, but they must clearly brand their online posts as personal and purely their own.

### Additionally:

- It is important for employees to properly define their association with the organization, as they would do offline.
- Dishonorable content such as slurs or demeaning or derogatory comments about any person's race, ethnicity, sex/gender, sexual orientation, age, religion, physical disability or any other status protected by federal, state or local law will not be tolerated.
- Employees are not allowed to disclose confidential information that is financial, operational and legal in nature, as well as any confidential information that pertains to ConRes, customers, and business partners.
- Employees shall not solicit or collect contributions or distribute written non-company material on company premises during their working time or to other employees who are then working.

## CUSTOMER RELATIONS

Customers are among our organization's most valuable assets. Every employee represents ConRes to our customers and the public. The way we do our jobs presents an image of our entire organization. Customers judge all of us by how they are treated with each ConRes employee contacted. Therefore, one of our first business priorities is to assist any customer or potential customer.

Nothing is more important than being professional, courteous, friendly, helpful and prompt in the attention given to our customers.

Our personal contact with the public, our manners on the telephone, and the communications we send to the customers are a reflection not only of ourselves, but also of the professionalism of ConRes. Positive customer relations not only enhance the public's perception or image of ConRes, but also pay off in greater customer loyalty and increased sales and profit.

## PRIVACY, CONFIDENTIALITY, AND DATA PROTECTION

ConRes is committed to the protection of your privacy, data, and personal information ("DATA") as further defined within the ConRes Privacy Policy which is available on our website [www.conres.com](http://www.conres.com) or you may contact us at [Privacy@conres.com](mailto:Privacy@conres.com) for further information.

## COMPLIANCE WITH LAWS, RULES AND REGULATIONS

ConRes and its respective directors, officers, and employees will comply with all applicable laws and regulations.

ConRes also expects our customers and business partners and their respective directors, officers, and employees to comply with all applicable laws and regulations and to conduct business in accordance with the letter, spirit and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

### Slavery and Human Trafficking

ConRes will comply and expects our customers and business partners and their respective directors, officers, and employees to comply, with all applicable laws, rules and legal regulations prohibiting slavery and human trafficking in its own business as well as in its supply chain.

### Compliance with Antitrust Laws

ConRes will comply and expects our customers and business partners and their respective directors, officers, and employees to comply, with all applicable antitrust laws, trade practice laws and any other competition laws, rules and regulations dealing for example with monopolies, unfair competition and restraints of trade, and relationships with competitors and customers. ConRes, our customers, and business partners will not enter into agreements or engage in other acts that may unfairly impact competition, including, but not limited to, price fixing or market allocations.

### Combating Corruption

ConRes will not tolerate any form of corruption and will not tolerate any form of corruption with our customers or business partners. ConRes will comply with all applicable laws and regulations concerning bribery and anti-corruption, including those concerning foreign corrupt practices. ConRes also expects our customers and business partners to comply with all applicable laws and regulations concerning bribery and anti-corruption, including those concerning foreign corrupt practices.

ConRes will not engage in or tolerate any form of corruption, bribery, theft, embezzlement, or extortion or the use of illegal payments, including without limitation, any payment or other benefit conferred on any individual, company or government official, for the purpose of influencing the decision-making process. ConRes also expects our customers and business partners to not engage in or tolerate any form of corruption, bribery, theft, embezzlement, or extortion or the use of illegal payments, including without limitation, any payment or other benefit conferred on any individual, company or government official, for the purpose of influencing the decision-making process.

Additionally, ConRes, its customers, and business partners must not offer illegal benefits or illegal favors such as money laundering, bribe payments, kickbacks, or other illegal benefits including inappropriate gifts and undue hospitality towards for the promise or exchange of business opportunities.

### Conflict Minerals

ConRes is aware of the applicable legal requirements in relation to “conflict minerals” including tin, tantalum, tungsten, their ores and gold originating from conflict areas and shall ensure compliance with such laws and will use best efforts to avoid the use of raw materials in its products that directly or indirectly finance armed groups violating human rights.

### Export and Import Regulations

ConRes maintains an effective export compliance program to ensure compliance with any ConRes export and re-export activities, and agrees to maintain a record of sales, imports, exports and re-exports of products and technology in accordance with the national record retention programs in the appropriate geographies, but at least for five (5) years.

## COMPLIANCE MONITORING AND MANAGEMENT

To ensure ongoing compliance ConRes maintains certain industry certifications and adheres to key industry standards that include but are not limited to:

- GDPR (US-EU)
- US Privacy Shield (US-EU)
- NIST 800-171 (All Revs)
- NIST SP 800-171 - 2020 Interim Rule
- NIST 800-053 (All Revs)
- DFARS 252.204-7012
- FAR 48 CFR 52.204-21
- FAR 52.203-13
- FAR 52.203-15
- Type 2 SOC 2
- ISO 9001:2015
- ISO 17025:2017
- GIDEP
- WBENC
- PCI
- HIPAA
- CMMC

## EQUAL EMPLOYMENT OPPORTUNITY

It is the policy of ConRes to recruit, hire, train and promote all persons in all job classifications without regard to race, color, religion, sex (including pregnancy and pregnancy-related conditions, gender identity and/or expression, and sexual orientation), national origin, ancestry, age, disability, active military or veteran status, genetic information and any other basis protected by federal, state or local law.

In addition, we will not discriminate or retaliate against a person because the person complained about unlawful discrimination or harassment, filed a charge of discrimination or harassment, or participated or cooperated in an employment discrimination investigation or lawsuit.

This applies to all types of work situations and all terms and conditions of employment, including but not limited to hiring, firing, promotions, harassment, training, wages, and benefits.

## SMOKING POLICY

ConRes is committed to providing a safe, healthy, and comfortable work environment. As a result, ConRes provides a smoke-free environment for all employees. Smoking is prohibited in all company buildings, offices and vehicles. For those who do smoke, ConRes has designated areas for smoking outdoors, in accordance with local laws.

## DRUG AND ALCOHOL USE

### Drug-Free Workplace and Alcohol Use Policy

The Drug Free Workplace Act of 1988 requires ConRes to inform all employees of its commitment to maintaining a drug free workplace to ensure security and protect the company's status as a source for Federal contracts. The use of illegal drugs or other controlled substances (including marijuana) in the workplace or while working threatens the entire environment and will not be tolerated. According to ConRes' Drug-Free Workplace Policy, the unlawful manufacture, distribution, possession or use of controlled substances (drugs and/or alcohol) while on company premises (owned or leased by the Company) or otherwise working on behalf of ConRes is prohibited. Company premises is defined as all property, buildings, parking lots, company vehicles, customer sites, and while conducting business-related activities off ConRes premises. This policy outlines prohibited conduct with respect to controlled substances, marijuana and alcohol, and complies with ConRes' obligations under the Federal Drug-Free Workplace Act of 1988.

### Alcohol in the Workplace

No one shall report to work or perform work for ConRes under the influence of alcohol. Use of alcohol in ConRes-owned vehicle or in a privately-owned vehicle while engaged in ConRes business is prohibited, as is the operation of any motor vehicle on ConRes business while under the influence of alcohol. In addition, the unauthorized sale, purchase, transfer or possession of alcohol on ConRes premises (including parking lots), in Company-owned vehicles, or while otherwise engaged in ConRes business is prohibited. Violations of this policy may lead to disciplinary action, up to and including immediate termination of such employment and/or required participation in a substance abuse rehabilitation or treatment program. Violations may also have legal consequences.

**NOTE:** Notwithstanding, the consumption of Alcohol may be allowed for certain approved company events.

### Notification of Convictions

The Drug Free Workplace Act also requires employees or anyone working on behalf of ConRes to abide by the terms of this policy and to notify the Company in writing within (5) five days of a conviction of a criminal charge involving controlled substances in the workplace. ConRes will take appropriate action within ten (10) days of receiving such notification, and federal contracting agencies will be notified in accordance with mandatory reporting obligations.

### Consequences

Employees who violate this policy will be subject to disciplinary action up to and including termination after the first offense. Such employees may be required to enter and complete a rehabilitation program as a condition of continued employment. Nothing in this policy prohibits ConRes from disciplining or terminating an employee or anyone working on ConRes' behalf for other violations of ConRes policies or for performance problems. Violations may also have legal consequences.

### Assistance

Consistent with its fair employment policy, ConRes maintains a policy of non-discrimination and reasonable accommodation with respect to recovering addicts and alcoholics, and those having a medical history reflecting treatment for substance abuse conditions. We encourage employees to seek assistance before their substance or alcohol use renders them unable to perform their essential job functions or jeopardizes the health and safety of themselves or others. ConRes will assist its employees through referrals to rehabilitation, appropriate leaves of absence and other measures consistent with ConRes' policies and applicable federal, state or local laws. We encourage employees who wish to seek professional assistance in overcoming drug or alcohol problems to contact the Human Resource Manager for more information about the benefits potentially available under the ConRes' benefit plans.

### **QUALITY POLICY**

It is ConRes' quality policy to provide our customers with products and services that comply with their requirements while meeting or exceeding their needs and expectations, through continual improvement to our Quality Management System (QMS), for performance, reliability and safety at a competitive cost.

### **SAFETY**

The importance of a safe work environment cannot be over-emphasized. At ConRes, we must consider the safety of our employees and customers at all times. A safe, clean, and orderly workplace also creates a positive impression of ConRes for visitors. Safety is everyone's responsibility. You have an obligation to help create a safe workplace and to avoid injuries and accidents.

If you are a member of management, you are also responsible for ensuring that all safety methods, procedures, and equipment are used daily. If an accident should occur while at work, immediately notify your supervisor. It is important that you report any on-the-job accidents even if you do not think it is serious. If anyone other than an employee is injured or becomes ill while on company premises, the same procedure should be followed.

### **DISPOSAL OF HAZARDOUS WASTE**

It is prohibited for anyone to dispose of chemical waste in the normal disposal system. Should anyone have any waste classified as chemical in nature, the Human Resource Department should be notified to ensure compliance with policy and procedure in disposing of the waste.

### **PRIDE IN WORKPLACE**

ConRes is proud of the neatness and cleanliness of all its facilities. From the standpoint of health and safety, as well as impressions on customers, vendors and job candidates, everyone shares the responsibility to cooperate in housekeeping. Your consideration and cooperation in keeping work areas, the cafeteria, conference rooms and bathrooms clean is most important. In addition, proper utilization of energy, supplies and equipment is another example of the care that is expected from everyone.

### **DRESS CODE**

At ConRes, we expect our employees and business partners to dress appropriately. Appearance matters when representing our company in front of clients, visitors or other parties. A person's appearance can create a positive or negative impression that reflects on our company and culture. All clothes must be work-appropriate. Clothes that are typical in workouts and outdoor activities are not allowed. All clothes must project professionalism. Clothes that are too revealing or inappropriate are not allowed.

## ANTI-HARASSMENT

ConRes is an equal opportunity employer and does not discriminate against employees or applicants for employment on the basis of age, ancestry, color, creed, disability, ethnicity, family status, gender, gender identity, genetic information, marital status, military status, national origin, political affiliation, pregnancy, race, religion, sex, sexual orientation, veteran status, or any other characteristic protected by federal, state or local law.

Accordingly, ConRes is committed to providing a work environment which is free from discrimination harassment based on race, color, religion, sex, sexual orientation, ancestry, national origin, age, genetic information, gender identity or expression, disability, veteran or military status, pregnancy or pregnancy-related condition or any other protected status as defined by applicable federal and state law.

Harassment based on sex or any protected characteristic is unlawful and will not be tolerated by this organization.

To achieve our goal of providing a workplace free from sexual and other unlawful harassment, the conduct that is described in this policy will not be tolerated and we have provided a procedure by which inappropriate conduct will be dealt with, if encountered by employees. Because the Company takes allegations of sexual and other forms of harassment seriously, we will respond promptly to complaints of unlawful harassment and where it is determined that such inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate. Please note that while this policy sets forth our goals of promoting a workplace that is free of unlawful harassment, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of sexual or other unlawful harassment.

## REPORTING A CONCERN

ConRes encourages our employees, customers, and business partners to report any violations or observed violations to the ConRes Human Resources ([hrdept@conres.com](mailto:hrdept@conres.com)) or through the anonymous reporting process described below. Based on the seriousness of your submission – please consider contacting ConRes Human Resources ([hrdept@conres.com](mailto:hrdept@conres.com)) directly.

### Anonymous Reporting Methods:

- i. Each submission will be reviewed quickly, will be taken very seriously and is 100% CONFIDENTIAL and 100% ANONYMOUS.
- ii. Each submission must have a defined subject and a detailed summary of the concern or observation in order to be properly reviewed.

### SUBMISSION METHOD 1: MAIL IN

- i. Create your own letter that contains the subject and summary of your submission.
- ii. Mail your form to:
  1. Continental Resources, Inc., ATTN: Cathy Shattuck, 175 Middlesex Turnpike, Bedford, MA 01730.
  2. Use the Continental Resources, Inc. address as your return address to remain anonymous.
- iii. Mail in submissions will only be reviewed by Cathy Shattuck (Director of Human Resources).

### SUBMISSION METHOD 2: ONLINE ADOBE FORM

- i. Complete the online ADOBE FORM:  
[https://secure.na1.echosign.com/public/esignWidget?wid=CBFCIBAA3AAABLbIqZhDA52H9\\_qqOd-Jlxll3hA0spAkORg41jpWzPL2SF8NyTA-xohbuDGQj7bA\\_VNqPv-8\\*](https://secure.na1.echosign.com/public/esignWidget?wid=CBFCIBAA3AAABLbIqZhDA52H9_qqOd-Jlxll3hA0spAkORg41jpWzPL2SF8NyTA-xohbuDGQj7bA_VNqPv-8*)
- ii. On the bottom of this form, you also have the option of attaching any additional files along with your submission.
- iii. In order to ensure your anonymity – when prompted for your name and email address enter “none” for the name and “[none@none.com](mailto:none@none.com)” as the email address.
- iv. Any online submissions will be reviewed by Cathy Shattuck (Director of Human Resources) and Louis Novakis (DPO).