
ULVAC Technologies, Inc.
Customer Service Business Group

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TITLE: ULVAC TECHNOLOGIES PROCURMENT CODE OF CONDUCT

DATE: 12.12.23

REVISION: 00

ACCESS LEVEL REQUIRED: Public

1. Introduction

- 1.1. At ULVAC TECHNOLOGIES, we recognize the importance of ethical conduct and transparency in all our procurement activities. This Procurement Code of Conduct Policy outlines the standards and expectations for employees, suppliers, and other stakeholders involved in procurement processes on behalf of the organization.

2. Ethical Conduct

- 2.1. All procurement activities shall be conducted with honesty, integrity, and fairness.
- 2.2. Employees involved in procurement shall avoid conflicts of interest and any actions that may compromise their impartiality.
- 2.3. Personal gain or advantage shall not influence procurement decisions.

3. Compliance with Laws and Regulations

- 3.1. Procurement activities shall comply with all applicable laws, regulations, and organizational policies.
- 3.2. Employees involved in procurement shall stay informed about relevant legal requirements and ensure adherence in all procurement transactions.

4. Confidentiality and Data Protection

- 4.1. Confidential information obtained during the procurement process shall be handled with care and confidentiality, in accordance with organizational policies and data protection regulations.
- 4.2. Employees shall not disclose confidential procurement-related information to unauthorized individuals or entities.

5. Fair Competition

- 5.1. Procurement processes shall be conducted in a manner that promotes fair and open competition among suppliers.
- 5.2. Selection criteria shall be transparent, objective, and based on factors such as price, quality, delivery time, and supplier capabilities.

6. Conflict of Interest

- 6.1. Employees involved in procurement shall disclose any potential conflicts of interest promptly.
- 6.2. Conflicts of interest shall be managed and mitigated appropriately to ensure impartiality and integrity in procurement decisions.

7. Gifts, Bribes, and Kickbacks

- 7.1. Employees shall not solicit, accept, or offer gifts, bribes, kickbacks, or other improper inducements from suppliers or other parties involved in procurement.
- 7.2. Any offers of gifts or hospitality shall be reported to appropriate authorities for evaluation and resolution.

8. Supplier Relationships

- 8.1. Relationships with suppliers shall be based on mutual respect, professionalism, and transparency.
- 8.2. Suppliers shall be treated fairly and provided with clear and timely communication regarding procurement processes, requirements, and expectations.

9. Documentation and Recordkeeping

- 9.1. Accurate and complete records shall be maintained for all procurement transactions, including contracts, purchase orders, invoices, and correspondence.
- 9.2. Documentation shall be retained in accordance with organizational policies and legal requirements.

10. Compliance

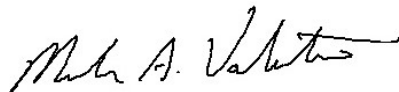
- 10.1 All employees, suppliers, and other stakeholders involved in procurement are expected to adhere to this Procurement Code of Conduct Policy.
- 10.2 Violations may result in disciplinary action, termination of contracts, or legal consequences.

11. Review and Revision

- 11.1 This policy will be reviewed periodically and revised as necessary to ensure alignment with organizational goals, regulatory changes, and best practices in procurement management.

12. Approval

- 12.1 This Procurement Code of Conduct Policy is approved by Mark Valentino, Senior Manager of Customer Service Business Group and is effective from December 12, 2023.



Mark A. Valentino, ULVAC TECHNOLOGIES

Revision History					
Rev. No.	Date	Page/s	Change	Written By	Approved By
00	12.12.2023	1	Document Created	Mark Valentino	Mark Valentino

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