

SUPPLIER CODE OF CONDUCT

Last Update: August 2023

This Supplier Code of Conduct applies to suppliers conducting business with Positioning Universal Inc., and its affiliates and subsidiaries (collectively hereinafter "PUI").

Child Labor

PUI will not allow the manufacture of its products using child labor as defined by the laws of the country in which the product is manufactured.

Forced Labor/Prison Labor

PUI will not allow the manufacture of its products using convict, forced, or indentured labor.

Modern Slavery/Human Trafficking

PUI is committed to promoting and upholding human rights and ethical practices in all aspects of our business. We recognize that modern slavery and human trafficking are grave violations human rights and are determined to prevent any form of exploitation within our operations and supply chains. We expect our suppliers, contractors, and business partners to share our commitment to combat modern slavery.

Health and Safety

PUI expects its suppliers to provide all their employees with a friendly and safe work environment in compliance with the laws of the country in which the product is manufactured. This covers not only the manufacturing area but also, where applicable, to provide healthy dormitory/living quarters and canteen including sufficient ventilation, cooling, and heating if necessary. Suppliers will comply with all legal obligations concerning health, safety, sanitation, environmental, and other applicable laws. In addition, the facilities must have adequate and easily accessible first aid kits, fire extinguishers, and emergency exits.

Compensation

PUI expects its suppliers to compensate their employees fairly in total conformance with the applicable compensation laws of the country of manufacture of production.

Discrimination

PUI expects its suppliers to not discriminate on the basis of gender, race, color, religion, sexual orientation, national origin, ancestry, age, or any other characteristic protected by applicable laws.

Labor Unions

PUI expects its suppliers not to discourage its employees from forming or participating in labor unions in accordance with the law.

Disciplinary Practices

PUI expects its suppliers not to use any type of corporal punishment or other forms of mental or physical discipline.

Legal Requirements

PUI expects its suppliers to comply with all applicable laws and regulations of the place of manufacture and also those of the United States (both federal and to the extent applicable, local).

Country of Origin Labeling

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PUI expects its suppliers to strictly conform to the country-of-origin rules and will not knowingly allow the importation of any product not in conformance with accurate country of origin labeling.

Monitor and Corrective Action

PUI reserves the right to monitor and/or designate a third party to monitor its suppliers through on-site inspections to ensure that these standards are being met. Any supplier who fails or refuses to comply with these standards is subject to, but not limited to, written warning and a ninety-day corrective action notice, cancellation of existing purchase orders, and/or termination of the business relationship with PUI.

Sub-contractor Compliance

PUI expects its suppliers to monitor their subcontractors to ensure that they follow the PUI Code of Conduct requirements and not to purchase components or other material from any supplier not in conformance with the Code of Conduct.

Gifts to PUI Employees

No gift or entertainment should ever be offered, given, provided, or accepted by a director, officer, or employee, of PUI a family member of a director, officer, or employee of PUI or any agent relating to the individual's position with PUI unless it (1) is not a cash gift, (2) is consistent with customary business practices (3) is not excessive in value, (4) cannot be construed as a bribe or payoff, and (5) does not violate any laws or regulations.

Dealings with PUI Directors, Officers and Employees

In order to avoid any conflicts of interests, no business relationship should be entered into, nor an offer of a business relationship be made to any directors, officers, or employees of PUI. Prohibited dealing may include the following:

1. any significant ownership interest in any supplier other than through purchase by the directors, officers or employee on a public exchange;
2. any consulting or employment relationship with any directors, officers or employee;
3. any outside business activity that detracts from an individual's ability to devote
4. appropriate time and attention to his or her responsibilities to PUI and
5. selling anything to the individual or buying anything from the individual, except on the
6. same terms and conditions as comparable directors, officers, or employees are permitted
7. to so purchase or sell.

Payments to Government Personnel

The U.S. Foreign Corrupt Practices Act prohibits giving anything of value, directly or indirectly, to officials of foreign government or foreign political candidates to obtain or retain business. It is strictly prohibited to make illegal payments to government officials of any country.