Partner / Supplier **Principals**

Creating a successful and sustainable business requires more than financial results. Responsible behavior is fundamental to how we do business at Turtle Graphx. It is not just what we do; it is how we do it. We are committed to achieving these high ethical standards, which underpin our role as a trusted source to our clients and the community, by managing operations responsibly and conducting business in an ethical way. Turtle Graphx’ relationships with its partners (both community organizations and municipalities hereafter referred to as Partners) and suppliers we work with are a critical part of this commitment.

To clarify what we expect from our Partners and suppliers, we have developed these Partner / Supplier Principles – Guidance for Responsible Business (hereafter referred to as Principles). The Principles outline a set of “best practice” expectations. They are not intended to conflict with or modify the terms of Partner/supplier contracts with Turtle Graphx. If a contract requirement (and/or applicable law or regulation) addresses the same areas as covered in these Principles, Partners and/or suppliers must comply with the contract (and/or legal) requirement.

Responsible behavior is vitally important to the reputation and success of Turtle Graphx. Our Partners and Suppliers are an important part of that effort.

What We Expect From Our Partners and Suppliers

**Code of Conduct and Compliance**

Turtle Graphx’ Code of Conduct is central to our responsible business environment. We encourage our Partners and suppliers to implement and adhere to their own similar written code of conduct. In addition, commensurate with the size and nature of their business, we expect our Partners and suppliers to have management systems in place to support compliance with applicable laws and regulations.

**Anti-Trust and Competition**

We expect our Partners and suppliers to conduct business in accordance with all applicable competition and anti-trust laws and regulations. We expect that our Partners and suppliers will not enter into formal or informal anti-competitive arrangements that fix prices, rig bids, limit supply, control markets, or otherwise improperly restrict or impact competition.

**Conflicts of Interest**

We expect our Partners and suppliers to avoid conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with Turtle Graphx. We understand that such actual or potential conflicts do arise in the course of business from time to time, in which case we expect our Partners and suppliers to timely disclose them to Turtle Graphx and all other affected parties.

**Anti-Corruption**

We expect our Partners and suppliers to comply with all relevant laws and regulations regarding anti-corruption including, where applicable, the Foreign Corrupt Practices Act and the UK Bribery Act. Turtle Graphx has a zero tolerance for any corrupt activity. In particular Turtle Graphx will not tolerate corrupt activity involving government officials at all levels, our commercial and charitable business partners, or the receipt of bribes or kickbacks by Turtle Graphx personnel. We will not offer, give, or receive any payment, benefit or gift that may be construed as a bribe, for any business purpose whether directly or through a third party. Turtle Graphx expects its Partners and suppliers to be similarly intolerant of corrupt activity and to have appropriate and adequate procedures to prevent such activity from taking place.

Turtle Graphx does not pay “facilitation” payments and will not pay for the expediting of routine government activity unless there is a formal lawful fee schedule for expedited service, and we similarly expect that our Partners and suppliers will not make such payments in connection with any Turtle Graphx business.

We expect our suppliers to ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, does not violate the rules and standards of the recipient’s organization, and is consistent with all reasonable market terms and conditions.

**Accurate Record Keeping**

We expect our Partners and suppliers to accurately and securely capture, store and retain, as appropriate, business records.

**Personal, Confidential & Proprietary Information**

We expect our Partners and suppliers to protect all sensitive information, including confidential, proprietary and protected personal information. Information should not be used for any purpose other than the business purpose for which it was provided without prior authorization. Where such information is held or transferred electronically, we expect our Partners and suppliers to implement appropriate IT cyber security and notify us of any suspected or actual data breaches. We expect our Partners and suppliers to comply with intellectual property rights and data privacy laws.

**Workplace/Employees**

We expect our Partners and suppliers to foster an inclusive work environment where individuals are treated with dignity and respect. To that end, we expect our Partners and suppliers to comply with applicable non-discrimination laws and regulations. We also expect our Partners and suppliers to ensure that employees may perform work in an environment that is free from harassment or other abusive conduct.

We expect our Partners and suppliers to not engage in the use of forced or bonded labor, slavery or trafficking of persons. Partners and suppliers should allow employees to freely choose to work or to leave employment. We also expect our Partners and suppliers to ensure that child labor is not used in the performance of work. The term “child” refers to any person under the legal minimum age for employment where to work is performed.

We expect our Partners and suppliers to comply with applicable laws and regulations on pay, benefits, working hours, health and safety, and the rights of individuals to join trade unions and participate in collective bargaining.

We expect our Partners and suppliers to provide employees and third parties with access to adequate reporting channels to seek advice or raise legal or ethical concerns without fear of retaliation, including opportunities for anonymous reporting. We expect our Partners and suppliers to take action to prevent detect and correct retaliatory actions.

**Environment**

We expect our Partners and suppliers to comply with applicable laws and regulations regarding the environment and to conduct their business in a manner that actively manages environmental risks.

**Timely Payment**

We expect our Partners and suppliers to pay their suppliers on time in accordance with agreed contractual payment terms.

**For Information or Questions Contact:**

Heather Rosengarten 631-412-3532

*Senior Executive Officer* [heather@turtlegraphxinc.com](mailto:heather@turtlegraphxinc.com)

**Online Resources:**

A copy of this document is available for download on our website at [www.turtlegraphxinc.com](http://www.turtlegraphxinc.com)

**New York State Constitution:**

A copy of this document is available for download at www.nysenate.gov/new-york-state-constitution