

# Standex

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## Code of Conduct



# Dear Standex Colleagues:

Welcome to Standex!

You have joined a company that, since 1955, has been making and keeping compelling promises: promises to our customers, our communities, our shareholders and, mostly importantly, to each other.

We operate in a complex environment through different businesses and a diverse, global workforce. A common thread has allowed Standex to stand the test of time: a vibrant, resilient, ethical and effective culture.

At the heart of our culture lie four foundational values we strive to uphold in our work and daily lives:

- » **Accountability**
- » **Innovation**
- » **Integrity**
- » **Teamwork**

You will see these values reflected throughout this Code of Conduct.

The Code is a roadmap for our journey; describing “how” we keep the many promises vital to our success. We comply with the laws that regulate our businesses. We act ethically in all interactions as we carry out our job duties. It is my hope and expectation that you will model the values of this Code of Conduct not only at work, but also in your communities.

Whether at or outside of work, we are each a reflection of Standex. Together we can thrive and create a workplace and community where we all benefit.

Thank you for being part of the team!

**Sincerely,**

**David Dunbar,  
President/CEO  
Chair, Board of Directors**



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# ABOUT THE CODE

*At Standex, we are each responsible for upholding the standards of integrity and accountability that impact our reputation. Regardless of whether you are an employee, officer or director and regardless of where we conduct business, all of us are expected to abide by the principles in this Code.*

## OUR COMMITMENT TO COMPLIANCE

As a global company that is traded on the New York Stock Exchange (NYSE: SXI), and with businesses operating all over the world, there are international laws, regulations and global standards that apply to all of us. In addition to these international laws and standards, we are committed to following the applicable laws of each location where we do business.

This Code applies to all employees (full-time, part-time and temporary), all contractors, executives, officers and our board of directors. Suppliers are subject to the Supplier Code of Conduct, which can be found here: [Supplier Code of Conduct](#).

## PURPOSE AND RESPONSIBILITIES

This Code provides an overview of some of the legal and ethical standards we are each expected to follow every day. It also provides clear instructions on how to report suspected violations of law or the Code.

If you are unsure of what to do in a situation, we are here to support you. Speak with your manager, Human Resources Business Partner, the Standex Legal Department or contact the 24/7 anonymous Hotline (information [here](#) or on the next page) about your concerns. There is no retaliation for bringing a concern forward.

Please read this Code carefully! You will be asked to sign an acknowledgment form saying that you have read this Code and agree to act in compliance with this Code.

## YOUR RIGHTS

As employees, we are all expected to follow the Code, but we recognize that you have certain rights. Nothing in this Code or in any referenced Standex policy is intended to limit or preclude you from exercising your rights under the law.

## WHEN A VIOLATION OF THE CODE OCCURS

When one of us fails to follow this Code or applicable laws, convinces someone else to violate this Code or retaliates against someone for reporting a Code violation, a violation has occurred.

Every potential Code violation is taken seriously and thoroughly investigated. Violating this Code may lead to disciplinary action, up to and including termination of employment. Violating the law (in addition to this Code) may lead to criminal prosecution or fines.

## POLICY MODIFICATIONS AND WAIVERS

We realize that not every situation can possibly be addressed in this Code. So, Standex has the right to modify this Code as necessary. If you believe that you should seek a waiver or exemption from any section of this Code, please contact the Standex Legal Department at +1.603.893.9701. Any waivers of this Code must be approved by the Board of Directors or their designees.

## HOW SHOULD I REPORT A CONCERN?

If you feel that you have seen or experienced violations of this Code, you should report your concern right away. Standex will investigate your concern so that any violations can be identified and stopped as soon as possible.



Talk to your **supervisor, manager, or other business leader (HR)** at your location



Call the **anonymous Standex Hotline (+1.800.514.5275)** which is open 24/7 to hear your concerns



Call the **Standex Legal Department (+1.603.893.9701)** to talk with one of our attorneys



Email the **anonymous Standex Hotline (<https://standex.alertline.com>)**



Call the **Standex Corporate HR Department (+1.603.893.9701)** to discuss what is happening

## NON-RETALIATION

*You are the eyes and ears of Standex. We value your help in avoiding and identifying misconduct. Retaliation, of any kind, for reporting a good-faith concern or participating in an investigation is strictly prohibited. If you retaliate against someone for reporting a good-faith concern or participating in an investigation, you will be subject to disciplinary action.*

*Retaliation is any action that would deter someone from reporting a concern or participating in an investigation. Examples include demotion, salary reductions, job reassignments, harassment, bullying, or any other action taken against someone as a result of them reporting a concern or participating in an investigation.*

*We encourage honest reporting, but we do not tolerate accusations when you know they are false. You should report your reasonable, good-faith concerns. You should never knowingly make a false accusation, lie or refuse to cooperate during an investigation - these are, in and of themselves, violations of the Code.*

# WHAT EMPLOYEES NEED TO DO

As an **employee** of Standex, you have a responsibility to:

- **Know and embody the Code.**  
Read it and follow it, along with any other policies that apply to your job.

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- **Think before you act.**  
Use good judgment, being honest and ethical in every action you take. If you are asked to violate the Code, don't do it! You will be held accountable for your actions

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- **Follow the law.**  
Understand the laws that apply to your job and our businesses.

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- **Ask for help.**  
When an answer is not clear, ask for guidance before taking action.

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- **Stay alert.**  
Pay close attention to any activity that is inconsistent with our Code, our policies or the law.

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- **Report concerns.**  
Do not ignore a violation. Prevent harm to Standex, its reputation and our employees by reporting your concerns immediately.



# WHAT MANAGERS NEED TO DO

As a **manager** of Standex, you have a responsibility to:

- **Model the Code and our values.**  
Promote a culture of integrity by making ethical decisions and showing honesty and integrity in everything you say and do.

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- **Talk about the Code.**  
Read the Code and understand it. Refer to it to answer questions. Make ethics conversations part of your routine.

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- **Be informed and responsive.**  
Encourage employees to come to you with questions or concerns. Listen to them carefully and offer guidance. Recognize that you may not always find the answers that you need in the Code, so know where to go for answers.

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- **Know your responsibilities.**  
If you are a senior financial manager, you are expected to know the [Code of Ethics for Senior Financial Management](#).

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- **Take action.**  
Look out for misconduct and report it to your manager, Human Resources Business Partner, the Standex Legal Department or the Hotline if you see it.

Be sure to couple messages about meeting business goals with a reminder that we can only do so ethically. Also remind employees of the many resources available for expressing their concerns. Comments like the following can create a misunderstanding for employees who hear them:

“We absolutely can’t miss the quarter.”

“Nobody needs to know about this.”

“Let’s keep this to ourselves”

“It was just a joke”

A close-up photograph of a male worker in a dark grey long-sleeved shirt, wearing large yellow and black earplugs and blue nitrile gloves. He is focused on working on a large, complex, metallic industrial component, possibly a turbine or engine part, which is mounted on a workbench. The scene is dimly lit, with a bright light source illuminating the worker's face and the work area. In the background, various industrial tools and equipment are visible, including a blue-handled tool and a white container. The overall atmosphere is one of precision and industrial labor.

***Promote  
a Positive  
Workplace***



## PREVENTING HARASSMENT, DISCRIMINATION & BULLYING

*We treat others as we would like to be treated. We strive to provide an environment that is free from all forms of harassment, discrimination and bullying. Behavior which is harassing, discriminatory or bullying is not tolerated under any circumstances.*

Everyone at Standex must be treated with respect and dignity. When we feel harassed, discriminated against or bullied at work, it can affect both our work performance and our mental health. This kind of behavior creates an unprofessional and emotionally damaging work environment for everyone. It is not permitted, and will not be tolerated. Harassment, unfair treatment, bullying and other discriminatory behavior is not only bad for our work environment - it may also be illegal. Anyone found violating these policies will be disciplined, which may include termination.

**Sexual Harassment** is any unwelcome behavior, remarks or gestures of a sexual nature which are personally offensive, intimidating or humiliating.

The behavior can either be **verbal** or **physical**. Examples include:

- » Unwanted pressure to go out socially after work
- » Unwelcomed sexual jokes, gestures or lewd comments
- » Unwanted explicit messages or images sent through social media to a co-worker
- » Whistles or name calling like *hottie, babe, or sweetie*
- » Unwelcomed touching like grazing or a neck rub
- » Making work assignment decisions based on receipt of sexual favors
- » Promising a promotion or a raise in exchange for a sexual favor
- » Threatening to fire someone unless they provide a sexual favor

When we feel sexually harassed, we are not able to do our best work, because the **work environment is intimidating or hostile**.

An unwelcome, sexual work atmosphere can be offensive not only to the person being harassed, but also to those around, because the atmosphere is disrespectful, unprofessional and undignified.

Anyone can commit, or be the victim of, sexual harassment. It does not matter your gender, employment status or supervisory role! **Sexual harassment can be done by anyone, to anyone.**

If you believe that there has been a violation of any anti-harassment or discrimination policy/principle of Standex, please report it through any of the channels listed in the section under [How Should I Report A Concern?](#)

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## EQUAL OPPORTUNITY EMPLOYMENT

*We value and respect the unique skills and voices of our employees. We hire, promote and use the skills and abilities of every person, regardless of any factor that doesn't relate to job performance.*

### Our Policy

Standex wants to hire, promote and use the skills and abilities of every person, regardless of any factor that doesn't relate to job performance. Valuing the unique contribution of each individual creates respectful and professional teamwork, so that we all can thrive. Participation of a diversity of voices and experiences leads to a shared environment where we can create the best value for each other and for our business.

There are many laws that protect people against discrimination based on factors that have nothing to do with their job performance (like their age, race, religion, ethnicity, sex, sexual orientation, marital status, disability and other characteristics). We comply with all such laws and are committed to promoting equal opportunity and fair treatment for all. Unequal treatment is not only unethical - it may also be illegal!

Employment decisions are made based on each individual's qualifications, merit and the needs of the business. If you believe that there has been a violation of any equal opportunity principle of Standex, please report it through any of the channels listed under [How Should I Report A Concern?](#)

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## WORKPLACE HEALTH, SAFETY & SECURITY

*We believe our employees deserve to work in an environment that is healthy, safe and secure. It takes all of us to ensure that we uphold the highest standards of health and safety.*

### Our Policy

- All employees are responsible to act for the well-being of people, the preservation of property and business continuity and to minimize our impact on the environment.

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- All employees are actively engaged in environmental, health and safety (EH&S), sharing their innovative ideas, taking positive actions to contribute to the achievement of EH&S activities and goals, and being recognized for their contributions.

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- All employees understand and accept responsibility and accountability for complying with the EH&S policies as an essential part of their work.

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- Operations look beyond compliance to broader business benefits of continuous and measurable improvement in the reduction of EH&S risks in everything we do.

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- Standex decisions and actions of all employees reflect safe attitudes and behaviors and a belief that one accident or incident is one too many.

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- We expect that all of those who work with us will follow these principles, including suppliers, vendors and contractors.

*Maintain  
Financial  
Integrity*



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# FRAUD & FINANCIAL RECORDS

*We are committed to having accurate, honest and timely financial records and dealings. As a public company, investors, customers, suppliers, financial institutions and other critical parties have an expectation and a right to know that our reported information is accurate.*

## Our Policy

We are expected to be truthful in all interactions and communications. Engaging in fraud of any kind is not tolerated. Fraud can come in many forms, the most common examples of which are specifically outlined in this section, however, it is crucial that all employees understand what fraud entails so you can recognize and avoid it.

The integrity of our financial records is of utmost importance. All employees are responsible for ensuring their accuracy. Financial records should be reliable, complete and accurate, as well as fair and objective. All financial books and records should be maintained in accordance with legal requirements and generally accepted accounting principles.

If we learn of a financial error, we must proactively disclose the error and correct our mistake.

If you are a senior financial manager, you are expected to know and live by the [Code of Ethics for Senior Financial Management](#).

Concerns regarding accounting, internal accounting controls or auditing matters should be promptly reported through the Hotline, described in the ["Contact & Resources" section](#) and will be reported to the Audit Committee and the Board of Directors. Reports may be made anonymously and will be treated confidentially to the extent legally permissible. There is no retaliation for reporting any concern.

### Common Fraud Examples:

- » Submitting false expense reports
- » Forging or altering checks
- » Making an entry in company records that is deliberately not in accordance with proper accounting standards
- » Misappropriating assets or misusing company property
- » Inflating sales numbers by shipping inventory known to be defective or non-conforming
- » Processing invoices to "dummy" vendors

# COMPANY FUNDS & ASSETS

*The buildings we work in, the technology that connects us to others, the ideas, technology and process improvements we develop, the emails we exchange, the computers and mobile devices we use to do our jobs - these are Standex assets that we are entrusted to protect. We use them to carry out our business and must protect them from damage, loss, misuse and theft.*

## Our Policy

### POLITICAL CONTRIBUTIONS

We cannot use company funds, assets, property or personnel to contribute or support political campaigns. This includes donations, gifts, fundraisers or loans and uncompensated use of Standex buildings, properties, equipment (such as laptops) and vehicles.

Any political activities must be conducted on our own time and using our own resources.

### PHYSICAL ASSETS

Physical property and resources are made available to employees to help us do our jobs. We should never lend, sell or give them away unless we are authorized to do so.

### ELECTRONIC ASSETS

Employees are often provided with electronic assets, such as computers, hardware, software, mobile devices and other media, to use on the job. These electronic assets should be used appropriately and lawfully. Please check the [Acceptable Use Policy](#) for more information.

### INTELLECTUAL PROPERTY

Intellectual property, such as patents, trademarks and trade secrets are also valuable Standex assets. We should passionately protect our intellectual property (IP) and remember that any IP created while at Standex belongs to Standex (to the extent permitted by law), even if we leave Standex. For more information, see the "[Confidential Information & Intellectual Property](#)" section of this Code.



# INSIDER TRADING

*We are a publicly traded company and are prohibited from using or sharing non-public information about Standex for financial or personal benefit.*

## Our Policy

We have a legal and ethical obligation to make sure that any **non-public** information we know about Standex is not shared with others outside of Standex and is not used for financial or personal gain.

“Insider trading” is the technical term for trading Standex stock based on non-public, material information that you are aware of. The Securities and Exchange Commission (SEC) monitors insider trading to ensure that neither you nor another insider are unfairly profiting from trades of Standex stock, when the rest of the investing public is unaware of the information you may know.

There are certain things that you should avoid doing if you become aware of any important Standex information that is not available to the general public.

## Do NOT:

- **Buy or sell the securities (such as stocks, bonds or derivatives) of Standex while you are aware of inside information.** *This applies for direct purchases as well as purchases made by family members. It also applies to trading of stock of other companies that may be impacted by the Standex information.*

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- **Recommend or suggest that someone else buy or sell the securities of any company while you are aware of inside information.** *The recommendation itself could be a violation of the laws, regardless of whether any buying or selling actually takes place.*

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- **Share material information with those who do not have a need-to-know.** *This includes sharing information with those inside Standex and those outside of Standex, such as family or friends.*

**Inside information** is information you may learn in your job about Standex or another company that has not been made public.

**Material inside information** is information that a reasonable investor would consider important in their decision to buy, hold or sell a company's securities. Examples include:

- » Financial forecasts
- » Earnings/dividend announcements
- » Acquisitions or divestitures
- » Strategy presentations and plans
- » Changes in top management

**Using material inside information** for your own financial benefit, or for someone else's financial benefit, or sharing the material inside information with others, **violates Standex's insider trading policy and may violate the law** (Section 10(b) and Section 16(b) of the Securities Exchange Act of 1934) **and can result in civil penalties and/or criminal charges!**

***Be Accountable***



# CONFLICTS OF INTEREST

*As employees of Standex, we are all expected to act in the best interests of Standex, rather than in our own personal interest. A conflict of interest may unconsciously influence even the most ethical person and the mere appearance of a conflict may cause our actions or integrity to be questioned.*

## Our Policy

We have a duty to ensure that all business decisions are made with Standex's best interest in mind. This means that nothing we do should interfere, or appear to interfere, with our responsibility for objective and unbiased decision-making.

We cannot use our positions or roles at Standex for family or personal advantage or gain.

We have to disclose, at the earliest time possible, if personal activities or relationships may interfere or appear to interfere with our duties and responsibilities for Standex.

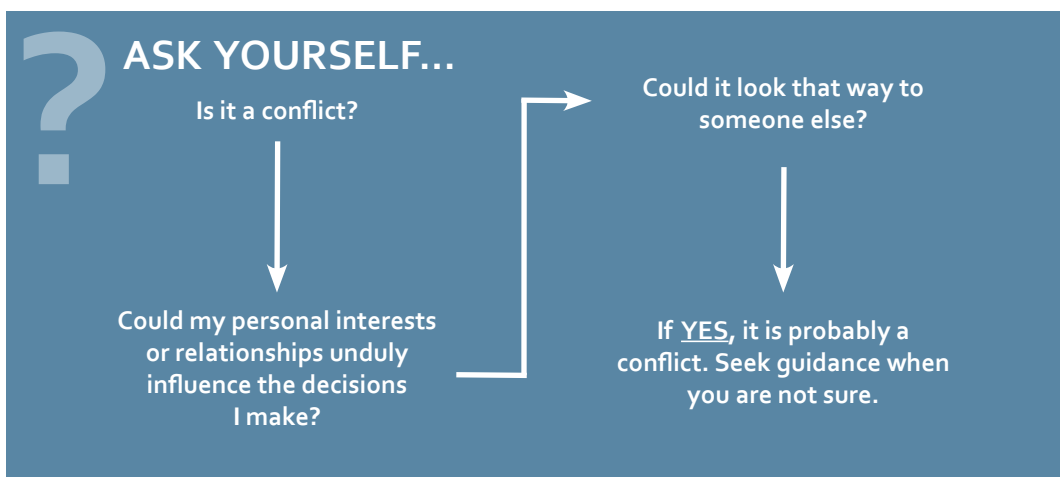
## What You Should Do

If you are ever in doubt about whether an action may create a conflict of interest, please seek guidance from your manager, Human Resources Business Partner or the Standex Legal Department.

Most conflicts of interest can be resolved or avoided entirely if you properly disclose them to Standex.

### Be aware of the most common situations where conflicts of interest can occur. These include:

- **Personal Investments and Opportunities:** *you have an investment (can be either stock investments or bond/debt investments) in a supplier or customer of Standex, and you are involved in the decision-making process of whether or not to do business with that supplier or customer.*
- **Outside Employment:** *in addition to being employed at Standex, you are employed by another company. You cannot work for a Standex competitor and you should not use Standex property if you do engage in outside employment.*
- **Family and Personal Relationships:** *you have a family member (or a close personal relationship with someone) who works directly under you at Standex, or for a supplier or customer.*





# GIFTS AND ENTERTAINMENT

We value the relationships we have built with our customers, suppliers and other business partners. These relationships often include sharing modest gifts and entertainment as a way of creating goodwill and establishing trust. It is important that these relationships remain positive and ethical and never influenced by offers of inappropriate gifts or hospitality.

## Our Policy

We do not exchange gifts or entertainment that look like or are an attempt to improperly influence a business decision.

While gifts and entertainment are a traditional way of expressing gratitude or building relationships, an overly generous gift can pressure the recipient to return the favor or feel indebted to the giver. This can often lead to a conflict of interest or the appearance of a conflict of interest. Excessive spending on gifts or entertainment is not acceptable. Gifts and entertainment should be:

- *Infrequent, given according to local custom and not excessive in value.*
- *Directly related to building customer or supplier relationships.*
- *Never tied to a potential contract or business tender.*
- *Never in cash.*

Modest meals and entertainment may be accepted or provided by Standex employees if the primary purpose of the meal or entertainment is business-related. In these circumstances, expense reports and records must accurately reflect the cost and purpose.

### Examples of When it is Okay

*An offer to go to lunch with a new supplier.*

*A branded t-shirt and some snacks in a gift bag at a conference.*

*A customer-sponsored golf outing at a local course with the potential customer.*

*Offering to have a drink after contract negotiations have finished.*

### Examples of When it is NOT Okay

*An extravagant meal for you and your family without the presence of the gifter.*

*A case of fine wine or a set of golf clubs.*

*A free trip to the Superbowl for you and your family.*

*An expensive watch that is shipped to your personal residence.*

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# TRAVEL & EXPENSE POLICIES

*We understand the necessity and value of traveling for business purposes. We expect employees to use their best judgment when traveling on Standex business and make expense decisions consistent with the needs and best interests of the business.*

## Our Policy

We travel and incur expenses consistent with business needs and for business purposes. All employees who travel for business are expected to use their best judgment when incurring travel-related expenses, and should never financially gain or lose from such travel.

We expect employees to use Standex-issued credit cards for business travel whenever possible. Using Standex-issued credit cards for personal travel or expenses is strictly prohibited without prior approval from Standex.

All expenses incurred must be reported through the expense-reporting system.

## Your Responsibilities

- **Know the travel & expense policy.** *Make sure to read the entire policy before going on any business-related travel so you are familiar with your responsibilities. The entire policy can be found [here](#).*

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- **Accurately report your expenses.** *Expense reports must be authentic and accurate - any incomplete, unsupported or unapproved expense reports won't be processed for payment.*

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- **Managers are responsible for reviewing and verifying the submitted expense information.** *All expenses that do not fall within the guidelines of the policy should not be approved and should be returned to the employee to correct or provide additional information.*



# *Protect Information and Records*



# CONFIDENTIAL INFORMATION & INTELLECTUAL PROPERTY

*Certain information is private, non-public and highly confidential. We have a responsibility to ensure that any information we have access to is properly secured and protected and our intellectual property is kept confidential.*

## Our Policy

We are all responsible for safeguarding our confidential and proprietary information - it should only be used for Standex purposes and should not be disclosed to anyone outside of Standex.



### Your role is to:

- **Use Standex information only for Standex purposes:** *Standex technologies, manufacturing processes, marketing plans, financial forecasts, supplier and customer information, internal communications and future product information are all proprietary - do not use or disclose this information for anything other than Standex business purposes.*
- **Classify, label and store Standex data, information and documents properly:** *you have an obligation to ensure that Standex data is protected and access is only granted to those who have a legitimate need to know.*
- **Keep third parties' proprietary information protected:** *in the course of your job at Standex, you may be privy to confidential information that belongs to third parties - you have a responsibility to keep that information secret and not use that information outside of that third party relationship.*
- **Honor these obligations even after your relationship with Standex ends.**

### Here is how you can help protect confidential information:

- » Log out, shut down or lock your computer before leaving it unattended
- » Don't allow unauthorized personnel into our buildings or facilities
- » Make sure visitors are accompanied in areas where confidential information may be available
- » Do not download or install unauthorized software on your computer
- » Don't let others use your passwords
- » Don't leave confidential or proprietary information out in the open in your workspace, in a conference room or on a printer or fax machine

# DATA PRIVACY

*We value the right to privacy of our employees, customers, suppliers and business partners. We are committed to protecting the information we receive by collecting, processing, storing, transmitting and using the data in a lawful manner, for legitimate business reasons only and by maintaining appropriate safeguards to prevent unauthorized access, use or disclosure of the data.*



## Our Policy

Standex is committed to collecting, handling and protecting personal information or data responsibly and in compliance with various global privacy laws.

As an employee of Standex, you may have access to various types of personal data and are responsible for knowing how to properly collect, process, store, transmit and use that data.

If you have any questions about your role and responsibilities, ask your manager or contact the Standex Legal Department.

If you believe there has been a data breach of any kind (unauthorized access, loss, disclosure or improper collection, processing, storage, transmission or use), please contact your local IT resource and the Standex Legal Department.

**Personal information** is any information relating to a directly or indirectly identifiable person.

**Common examples** include:

- » Name
- » Email Address
- » Telephone Number
- » IP Address
- » Employee ID Number
- » National ID Number
- » Credit Card Information
- » Medical Information
- » Financial Information

# ACCEPTABLE USE & CYBER-SECURITY

Standex systems and information resources are strategic assets of Standex. The computer equipment and resources provided to employees are expected to be used for performing job-related duties. Any use of Standex systems contrary to the [Acceptable Use Policy](#) is prohibited.

## Our Policy

### [THIS CODE](#)

Standex systems may not be used in any way that violates Standex policies or rules, including this Code of Conduct, or in a manner that is inconsistent with the mission of Standex or misrepresents Standex.

### [UNLAWFUL PURPOSES & SOLICITATIONS](#)

Standex systems may not be used for illegal or unlawful purposes, such as copyright infringement or plagiarism. This prohibition includes creating offensive or disruptive messages or materials for example obscenity, libel, slander, defamation, harassment, racial slurs, protected class commentary, intimidation or computer tampering.

### [EMAIL COMMUNICATIONS](#)

Email communications should be kept professional and respectful and should never include offensive or disruptive materials. Standex email and other systems may not be used to solicit for religious or political causes, commercial ventures or other organizations which are not related to Standex business.

### [IT EQUIPMENT PURCHASES & MODIFICATIONS](#)

All IT equipment must be purchased by IT personnel and personal equipment should not be used to access Standex networks without authorization. Modifications to Standex networks (such as adding or modifying servers, switches, routers, etc.) and workstations (such as software downloads) must be authorized.

### [CONFIDENTIAL INFORMATION & DATA PRIVACY](#)

To further our missions and policies regarding confidential information and data privacy, certain Standex systems should be used for the storage and transmission of such information. These systems are secured with encryption technology and are the only approved methods of storage and transmission of data. PC hard drives, portable storage media and unauthorized file-sharing programs (such as DropBox) should **not** be used for storage or transmission of confidential information or personal data.

### [INTERNET USE](#)

Personal use of the internet, within reason and as allowed by local policies and procedures, is permitted, but your use should not interfere with productivity, achieving business objectives or network performance. Use of internet anonymizers, video or audio streaming, and accessing adult content, games or gambling is strictly prohibited.

### [MONITORING](#)

Standex has the right to monitor all Standex systems including email, phones and workstations according to local laws. Any use of Standex systems that is found to be illegal may be reported to law enforcement. Any use of Standex systems that is found to be a violation of this Code will be subject to discipline, up to and including termination.

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# PUBLIC COMMUNICATIONS

*We communicate responsibly. This includes communications on social media and communications with the media and public. It is important that your social media postings are respectful and that only specifically authorized individuals communicate with the media and respond to inquiries.*

## Our Policy

### SOCIAL MEDIA

We all use social media in our free time. Please remember that you are a reflection of Standex even when you are on your own time. For this reason, we believe it is important to continue to follow the principles in this Code. You should not post anything discriminatory, harassing, bullying, threatening, defamatory or unlawful. Don't post content, images or photos that you don't have the right to use. If your personal posts create a hostile environment at work for your Standex colleagues, an investigation, and possible discipline, may occur.

### MEDIA INQUIRIES

From time to time, Standex and its employees may receive unsolicited inquiries from the media, investors, and members of the general public. It is important that employees whose job functions include communicating with such people are the only ones who answer these inquiries and communicate on behalf of Standex. You should not be responding to an inquiry unless you have been specifically authorized to respond. If you receive an inquiry, you must report it to your immediate supervisor or call the Standex Legal Department at +1.603.893.9701.

### REGULATORY INQUIRIES

Inquiries may also be received from time to time by government regulators. Employees should not respond to such inquiries unless you are authorized to do so. All such inquiries should be promptly disclosed to your immediate supervisor, who shall report them to the head of the business unit which is the subject of the inquiry, and the Standex Legal Department.



*Deal Fairly  
with Others*



# FAIR COMPETITION

*Our reputation depends on doing business honestly and with integrity. We are committed to full compliance with the laws, rules and regulations of the countries in which we operate. We believe in fair competition because everyone benefits from a competitive market.*

## Our Policy

We have a legal and ethical obligation to compete fairly. In all dealings with our competitors, customers and suppliers, we must act honestly, impartially and in compliance with fair competition laws and regulations.

Employees should be aware of the applicable laws and regulations in the countries where they work. These laws are often very complex and you should seek guidance from the Legal Department if you have questions about potential issues.

## What You Should Do

- **Be careful at trade shows and conferences.** *Make sure to avoid discussions about prices, costs, terms of sale, segments, customers or marketing strategies with competitors.*

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- **Gather competitive intelligence ethically and lawfully.** *Information about our competitors is important for our business. However, the information should be gathered and received in a manner that is lawful and ethical. You should use public sources and be honest.*

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- **Win business the right way.** *Be honest about our products and services. You should not make any claims you cannot substantiate or make inaccurate remarks about competitors or their products.*

## What You Should **NEVER** Do:

- » **Price Fix:**  
Competitors should not discuss their prices or set their prices in coordination, either overtly or tacitly. They should only compete freely and independently.
- » **Divide Markets:**  
Competitors should not discuss or agree to divide customers, products or geographic territories into areas where they will not compete against each other
- » **Rig Bids:**  
Competitors should not discuss bids or agree to coordinate their bid prices, terms or conditions.
- » **Boycott:**  
Competitors should not discuss or agree to boycott another company.

# INTERNATIONAL BUSINESS & TRADE

*Standex is committed to the highest ethical standards in all business transactions. All Standex employees must follow all applicable laws, rules and regulations when conducting Standex business.*

## Our Policy

### INTERNATIONAL OPERATIONS

Laws and customs vary throughout the world, but all employees must act as prudently and diligently in all of the nations in which we do business. This means that employees must be sensitive to foreign legal requirements, as well as US laws that apply to foreign operations.

### DEALING WITH GOVERNMENT OFFICIALS

It is often necessary as part of international operations to deal with foreign government officials. Any payments made to any foreign agent or government official must be lawful under both US laws and the laws of the foreign country. Such payments are typically for services rendered and should be reasonable in amount given the nature of the services.

Under no circumstances should you give anything of value to a foreign agent or government official in exchange for obtaining or retaining business in that country. Gifts or payments in order to facilitate a local process or influence a local government official are strictly prohibited and may be illegal.

All employees that work with federal, state or local government agencies should know and abide the various laws and regulations covering these relationships, including the Foreign Corrupt Practices Act (FCPA) and the ["Anti-Bribery"](#) policies of this Code.

### IMPORT AND EXPORT LAWS

We must all comply with all local and foreign laws regarding customs, import and export. The sale of our products in foreign countries and the use of foreign suppliers may be subject to export and import laws and regulations in both the US and the foreign country.

Specifically, for any products that are related to national defense, we must obtain export licenses before the products can be sold in a foreign country. Similarly, there are commercial products that may be subject to export controls. Digital transmission of technical specifications about these products is also subject to export restrictions.

Employees that are involved in export and/or import must be familiar with Standex policies and processes regarding exports and imports and should consult with the Legal Department if they are unsure about applicability of the laws to a particular situation.

### SANCTIONS AND BOYCOTTS

As a multinational corporation, Standex must comply with various government trade controls and sanctions, which restrict Standex from engaging in business with certain countries, entities and people. Standex also cannot refuse to do business in support of an unsanctioned boycott.



Contact the Standex Legal Department (+1.603.893.9701) if you have questions, since these are very complicated areas of the law.

## ANTI-BRIBERY

*Our success is based on the quality of our products, never on unethical or illegal behavior. We do not tolerate acts of bribery or corruption.*



### Our Policy

There are various anti-bribery and anti-corruption laws in the places we do business and the consequences of violating these laws are often severe. We should never bribe anyone, in any business dealing, in any country around the world. Kickbacks or small facilitation (or “grease”) payments are also prohibited. We should also never accept a bribe (or anything of value).

Standex maintains strict controls to prevent and detect bribes and we maintain accurate books and records to reflect the true nature of transactions.

There are certain exclusions for gifts & entertainment. Please see [“Gifts and Entertainment”](#) for more information.

#### Learn to spot a bribe.

Bribes can sometimes come in non-obvious forms - things like gifts, promises of a job, trip offers, or even charitable contributions can be considered bribes if given in exchange for a decision or favorable treatment.

#### If you hear comments like these, stop and seek help!

“Do not worry, that is just the way we do business in this country.”

“This payment does not require approval.”

“A political contribution might help speed things along.”

“I’ll scratch your back if you scratch mine.”

“There’s something in it for you if you approve this contract.”

# ACKNOWLEDGMENT

*Please indicate that you have received, read and will abide by this Code of Conduct by signing your name and dating the below acknowledgment and returning it to your supervisor.*

I certify that I have received and read this Code of Conduct, provided to me on \_\_\_\_\_.  
(date)

I certify that I will abide by this Code of Conduct and all Standex policies.

\_\_\_\_\_  
(sign here)

\_\_\_\_\_  
(print name here)

\_\_\_\_\_  
(print Standex division & company name)

\_\_\_\_\_  
(input date of signature here)

## CONTACT & RESOURCES

Maybe you sense that something is not completely right at work. Maybe you saw or heard something that may be a violation of this Code, our policies or the law. If so, you have a responsibility to share your concerns by reporting them.

You are the eyes and ears of Standex. We value your help in avoiding and identifying misconduct. Retaliation, of any kind, for reporting a good-faith concern or participating in an investigation is strictly prohibited. If you retaliate against someone for reporting a good-faith concern or participating in an investigation, you will be subject to disciplinary action.

Retaliation is any action that would deter someone from reporting a concern or participating in an investigation. Examples include demotion, salary reductions, job reassignments, harassment, bullying, or any other action taken against someone as a result of them reporting a concern or participating in an investigation.

We encourage honest reporting, but we do not tolerate accusations when you know they are false. You should report your reasonable, good-faith concerns. You should never knowingly make a false accusation, lie or refuse to cooperate during an investigation - these are, in and of themselves, violations of the Code.

## HOW TO REPORT A CONCERN:



### Talk to your Manager

Your supervisor, manager or other business leaders at your location are here to help.



### Call the Hotline

The Standex Anonymous Hotline is available 24/7 in any language you speak. For the US, please call: **+1.800.514.5275**. For outside of the US, please dial the AT&T country code, then **800.514.5275**.



### Email the Hotline

The Standex Anonymous Hotline accepts written submissions via: [standex.alertline.com](https://standex.alertline.com) for US locations or [standexeu.alertline.com](https://standexeu.alertline.com) for international locations.

### Policies & Resources

- [Trade Secret Policy](#)
- [Travel and Expense Policy](#)
- [Anti-trust Law Policy](#)
- [Sexual Harassment Policy](#)
- [Equal Employment Opportunity Policy](#)
- [Acceptable Use Policy](#)



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