



Supply Chain Ethics Code

Conflict of Interests

It is the Company's policy that no employee or member of an employee's family shall accept any commission, fee, or other monetary consideration from any person or company that has, had or is pursuing a business relationship with the Company.

Gifts, Gratuities and Entertainment

Furthermore, no employee or any member of an employee's family shall accept, on account of his or her work for the Company, any gift in any form, any third party's promotional item valued at \$25 or more, or any entertainment, travel or favors which go beyond normal and proper business courtesies, create an appearance of impropriety, impose a sense of obligation or result in favored treatment.

Any employee who is offered or receives any payment contradictory to this policy shall immediately report the matter to the Purchasing Manager. The payment or gift is to then be returned to the giver, with an accompanying letter explaining the company's official position on gifting. Stronger steps may be taken at the discretion of management.

Business lunches, dinners or social events are a good way to develop relationships as long as the persons involved remain free of obligation. Special care must be taken to avoid the appearance of impropriety when a key negotiation is in progress. Even a lunch at times may be inappropriate. Employees must keep their supervisor informed of all such supplier entertainment events.

Using a supplier's hunting lodge, fishing camp, summer cottage or other facilities for personal use is likewise forbidden. Joint vacations with supplier personnel are also forbidden. The sole exception to this would be if supplier personnel are family members or long standing personal relationships that existed well in advance to the initiation of the business relationship. Any personnel with family ties to supplier personnel must make these known to management in any case.

Using a supplier's transportation for personal use is forbidden. Suppliers may provide transportation for business purposes for travel to and from one of their locations, but such situations must be reviewed with, and approved by management beforehand.

Solicitation of anything of value from a supplier for personal use is forbidden. Solicitation of suppliers for the purposes of supporting company-sponsored charity events or joint marketing initiatives are allowed, but in all cases under the direct supervision of management.

Information Disclosures

Disclosure of any company data or corporate information is strictly prohibited except when the data and/or information disclosure is authorized by Executive Management. Employees must safeguard all confidential data and information and not disclose it to any third party without prior consent. Company data include strategy, sourcing information, current or historical pricing, supplier names & other detailed part master information.