



CODE OF CONDUCT

Kasai North America, Inc.

Kasai Mexicana S.A. de C.V.



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Chairman's Message

Dear Colleagues,

It is essential to the success of our Company to act responsibly and in compliance with the law. But my commitment to compliance goes beyond merely complying with the law. One of my most



important roles is to help create the best possible work environment for everyone in our Company. We should have the comfort of knowing that we work in a safe and ethical workplace and conduct business in a way that makes us proud. My hope is that we are proud to work here, feel good about our jobs, and attain our highest productivity.

Every person, regardless of position, shares in this responsibility. That is why it is so important that we all do our part to achieve this commitment. One incident, one news story, one careless comment, and what we have worked so hard to achieve can be lost. That is why the way we conduct our business is as important as the products we sell.

Our Code of Conduct provides us with resources and information to operate our business ethically and in



compliance with laws. It is intended to help us make good decisions on the job every day. A strong company is built on good decisions made through discussions with others, so you should never feel alone when facing an ethical dilemma. Speak up if you have a concern or see a problem, and seek guidance anytime you are unsure about the right thing to do.

Our continued success depends on each and every one of us consistently doing what is right. We want to be proud not only of our achievements but also of how we achieve success. Our Code of Conduct represents fundamental characteristics of the way we will operate our business – our KNA DNA.

Thank you for your commitment to compliance and ethics.

Toshimasa Yamane

Chairman/CEO

Introduction

Today, as the automotive industry continues to become more complex and challenging, it is important that we all understand our obligations to conduct business in a way that is ethical, consistent with our Policies, and in compliance with the law. Situations involving ethics and compliance can be complicated, and you need the resources to make the right choices. Our Code of Conduct is designed to explain many common issues at a high level. While it would be impossible to prepare a code of conduct that takes into account all legal and ethical dilemmas, our Code of Conduct is meant to provide guidance to help you make the right decisions. It also provides guidance on where to look for information or who to ask if you need help.

It is not always easy to know the right decision to make. That is why we need our Code of Conduct. Our Code of Conduct aims to ensure that all of our employees act with integrity, comply with applicable laws, and are proud of our Company.

The guidance provided by our Code of Conduct can be summarized as follows:

- We all have a responsibility to follow the law and act ethically. Members of management have higher responsibilities to set the right example.

- When dealing with others, we must act ethically and with integrity – our reputation depends on it.
- We must avoid situations where our business judgment may be compromised by a conflict of interest.
- Financial information must be reported, tracked, and maintained with accuracy.
- We must protect the confidential information of our customers, suppliers, vendors, and employees.
- The health and safety of our workforce is our top priority. We must protect ourselves and our colleagues from harm by focusing on accident prevention and risk awareness.
- We must strive to obtain a diverse workforce and treat everyone with dignity and respect.
- We are obligated to fulfill our trade obligations when transacting business across our country's borders.

Q&A

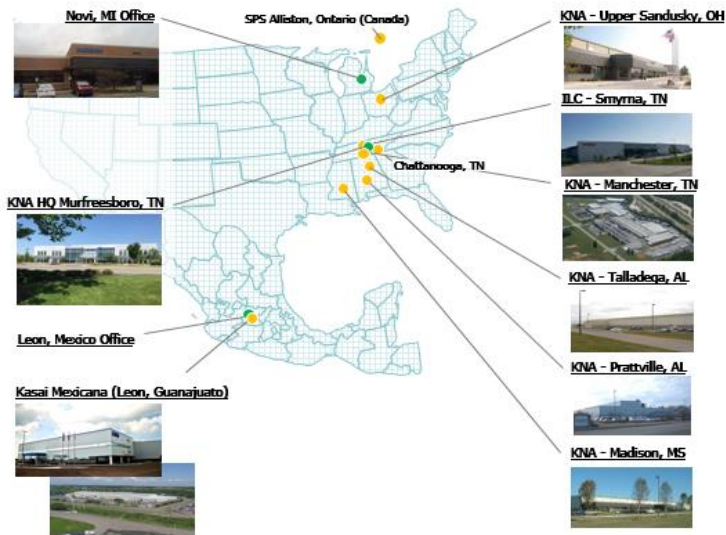
Q: The words Ethics, Compliance, Integrity, and Honesty are frequently used in our Code of Conduct. What do they mean?

A: **Ethics** are the moral principles that govern a person's behavior. This is a higher standard than merely complying with the law. **Compliance** is the action of meeting the requirements of applicable laws.

Integrity is the quality of being honest and having strong moral principles, even in difficult situations.

Honesty is the quality of being truthful, trustworthy, and free of deceit.

It is not enough to merely have a code of conduct. You must read, understand, and follow our Code of Conduct and act ethically and honestly. Our success depends on you taking an active role and making sure all of us conduct business in a compliant and ethical way.



Taking Responsibility for Compliance

Compliance and Reporting

We all have a responsibility to maintain our reputation for high ethical standards. No matter what position you hold, you represent our Company. Remember that as you perform your job duties, interact with our customers, and work with third parties.

Educate Yourself

You must know our Code of Conduct and complete our ethics and compliance training. Education is an important part of enabling our employees to act ethically and legally. If you have any questions or need help making a decision, please seek help from the HR, Legal, or Compliance Department.

Speak Up

If you see or suspect anything illegal or unethical, it may seem easier to not say anything or let someone else report the issue. However, you have a responsibility to report your concerns. No concern is too small to report. Share your concerns promptly and fully. This does not only apply to reporting violations. You are encouraged to ask questions and suggest ideas. We also strive to reward ethical conduct, so please let the HR or



Compliance Department know if you observe an employee exhibiting our high ethical standards.

Mistakes Are Opportunities

We view mistakes as opportunities. We want to learn from our mistakes, but in order to learn from our mistakes, we first must acknowledge them. It is expected that mistakes be reported by the individual that made the mistake. By making mistakes and misconduct transparent, we can prevent or reduce the harm to our employees and our Company. While self-reporting a mistake does not absolve you of the misconduct, it will be a significant factor in determining the appropriate corrective action.

Compliance with Different Laws

Since we conduct business around the world, our Code of Conduct and our Policies may sometimes differ from local laws, rules, and regulations. Where there appears to be a conflict, you should typically comply with the more restrictive requirement. Remember that multiple countries' laws may apply to the same business conduct. If you are uncertain as to the correct course of action or believe you cannot comply with the local law, our Code of Conduct, and our Policies, you should contact the Legal or Compliance Department for assistance.

Non-Retaliation

We know it takes courage to share your concerns and report something illegal or unethical. Because it is so important to us that you speak up, we promise that we will not permit retaliation against anyone who raises questions or concerns. In the same manner, we will not permit retaliation against anyone who makes a good faith report about a potential violation of our Code of Conduct or our Policies or assists in an investigation.

Honesty in Reporting

While it is important to report suspected compliance and ethics violations, it is just as important to do so honestly. You must not file a dishonest report for the purpose of retaliating against another employee, gaining an advantage in a conflict or for personal gain, or harassing another employee. Knowingly filing a false report is itself a violation of our Code of Conduct and our Policies.

Q&A

Q: I think my manager may be violating our Policies, but I'm worried that he may find out I reported him, and as a result, he will give me a poor competency evaluation. What does our Company do to address this situation?

A: Our Policies and our Code of Conduct prohibit your manager from retaliating against you for making good faith reports about violations of our Policies or our Code of Conduct.

Responsibility of Management

Our employees in supervisory roles have greater responsibilities. Our managers and supervisors must serve as role models, carry out work in accordance with high ethical standards, and set the ethical tone for the workplace. If managers or supervisors fail to do so, they may be held accountable if an employee they supervise breaks the law or violates our Code of Conduct.

To demonstrate their commitment to our Code of Conduct and high ethical standards, managers and supervisors should:

- Be familiar with our Code of Conduct and our Policies.
- Ensure employees understand our Code of Conduct and our Policies.
- Discuss our Code of Conduct and reinforce ethics and compliance.

Q&A

Q: I told my employees that we must meet our goals this quarter. I told them I don't care how they do it, as long as they meet our goals. After all, when we hit our numbers, we all win. Did I send the right message?

A: No. Although encouraging our employees to reach our goals is important, we need to do so legally and with integrity. You should send the message that we achieve our goals the right way – by following the law, our Policies, and our Code of Conduct.

- Foster an environment where employees are comfortable raising concerns without fear of retaliation.
- Reward ethical behavior and never retaliate or tolerate retaliation against anyone who reports a good faith concern or cooperates with an investigation.
- Use our Code of Conduct to evaluate employees.
- Never request or encourage employees to violate our Code of Conduct, the law, or ethical principles to achieve business results.
- Always stop violations of our Code of Conduct and our Policies.



If an employee approaches a manager or supervisor about a compliance question, the manager or supervisor should listen to the question carefully. Ask for clarifications and additional information as necessary.

The manager or supervisor should reach out to the Legal or Compliance Department if he or she is not able to appropriately answer the questions.



Where to Go for Help?

If you have a question, problem, or concern, in some cases, your manager or supervisor may be your first point of contact. He or she may be in the best position to understand your concern and help you determine the next step. If you are uncomfortable speaking with your manager or supervisor, or if you already shared a concern and feel it is not being addressed appropriately, you can reach out to the HR, Legal or Compliance Department. You can also make an inquiry through our anonymous compliance and ethics hotline. While you can make inquiries and report concerns anonymously,

you are encouraged to identify yourself so that the Compliance Department can follow-up or offer recognition, if appropriate.

Note that nothing in our Code of Conduct prohibits you from communicating with government agencies about possible violations of federal and state laws or providing information to government agencies, filing a complaint with government agencies, or participating in government agency investigations. Our Code of Conduct does not require you to notify our Company of any such communications.



Dealing with Others with Integrity

We are committed to dealing with others ethically and with integrity. Our reputation depends on our ability to maintain our integrity at all times. Every business decision we make must comply with the law and reflect our high ethical standards.

Competition and Antitrust

We must compete vigorously while strictly complying with all applicable antitrust laws. We will not engage in any activities that violate these laws such as agreeing with our competitors to fix prices, discounts, or terms of sale, limit production, divide markets, coordinate bidding activities, or boycott customers or suppliers.

Q&A

Q: I ran into a former co-worker at a sporting event who works for one of our competitors. He asked me how business was going. What should I do?

A: There is nothing illegal about responding in a general, non-specific way, but avoid any detailed information about our business and be aware that simply having a conversation with a competitor can give the appearance to others of something illegal or unethical.

Informal Understandings

We must avoid informal understandings as well as formal written and oral agreements. Even silence in the presence of a discussion by other competitors about prohibited topics could be interpreted as participation in an illegal agreement.

Conferences

Special care must be taken at conferences and other industry meetings. The opportunities that arise at such events to meet and hold discussions must not be used to exchange information to influence market conditions. Restrictions also may apply to the exchange of information on market research and benchmarking projects. Non-compliance with fair competition and antitrust regulations may have far-reaching consequences, such as fines, prison sentences, and civil liability.



Collecting Information

You are permitted to collect, share, and use information about our competitors, but it must be done in a legal and ethical manner. It is acceptable to collect competitive intelligence through publicly available information such as government filings, public speeches, annual reports, and news and trade journal publications. You must not ask for proprietary or confidential business information directly from a competitor. You must also refrain from sharing proprietary or confidential business information of former employers. You must never engage in fraud, misrepresentation, deceit, or illegal or illicit activity to obtain information.

Non-compliance with these principles cannot be justified by the behavior of others with the excuse that “everybody does it.” Any conduct that violates the law ultimately hurts our Company.

Q&A

Q: We just hired someone who used to work for one of our competitors. Can I ask her about some of his prior employer’s pricing information for its new products?

A: No. It’s never appropriate to ask former employees of other companies to disclose confidential business information, especially when he or she used to work for a competitor. We must gather competitive information legally and ethically.

Therefore, such conduct is absolutely and unequivocally prohibited.

Our Antitrust Policy provides a more complete explanation of how we uphold this commitment.

Anti-Corruption and Anti-Bribery

We prohibit all forms of corruption and bribery and will take all necessary steps to eliminate corruption and bribery in our business activities. This prohibition not only applies to our employees, but it also applies to any third party representing us or acting on our behalf. These obligations apply in all cases, but are especially strict in matters involving government officials. Our commitment to anti-bribery applies, without exception, to all of our operations, regardless of the local laws or cultural practices.

Q&A

Q: In my home country, it is common to give government workers a small payment (usually under \$50) so that work gets done more quickly. Can I make these payments?

A: No. This type of payment would be considered a “facilitation” or “grease” payment. Although these payments are common in some countries, they are prohibited under United States law and our Code of Conduct.



A bribe is giving or offering to give anything of value to influence a discretionary decision. A bribe can be something other than cash. A gift, loan, or job offer can be considered a bribe if it is offered in exchange for a decision. There is no monetary threshold—any amount could be considered a bribe.

We all must do our part to ensure that bribery and corruption do not occur. You must keep accurate books and records to ensure that payments are not inadvertently used for unlawful purposes. You must also exercise caution when selecting third parties who work on our behalf, and you must closely monitor their compliance with our standards and the law. If you are offered or asked for a bribe, no matter how small, you must refuse it and make it clear that we do not engage in bribery or corruption. Remember that appearances matter. Never engage in any activity that even suggests something improper.

Our Anti-Corruption and Anti-Bribery Policy provides a more complete explanation of how we uphold this commitment.

Ethical Business Dealings

We value our partnerships with our customers, suppliers, and vendors. We must always deal fairly with them and treat them with respect.

To fulfill this commitment, you must not engage in any unfair, deceptive, or misleading practices. You must

always present our products and information in an honest and forthright manner. You must be fair, factual, and complete in our sales and promotional materials, and must provide only truthful information about our products and not make disparaging remarks about our competitors.

We must also be careful to select customers, suppliers, and vendors who are committed to ethical business practices. If your work involves selecting or managing customers, suppliers, or vendors, you must practice due diligence. It is important to hold them accountable and monitor their activities. If a customer, supplier, or vendor fails to meet our standards, we must take appropriate action.

Our Anti-Fraud Policy provides a more complete explanation of how we uphold this commitment.



Avoiding Conflicts of Interest

To ensure the integrity of our business dealings and protect and promote the best interests of our Company, you must not let personal interests affect business decisions you make on behalf of our Company. A conflict of interest may occur when your personal interests impact your ability to make objective decisions for our Company. Conflicts of interest can harm our Company financially, but even more significantly, can be damaging to our reputation. In many cases, corruption and fraud result from conflicts of interest. You should take steps to address and avoid even the appearance of a conflict of interest.

Vendor or Supplier Selection

You must take particular care if you are responsible for selecting or dealing with a vendor or supplier. Your personal relationships, including family relationships, or interests must not interfere with your ability to objectively make decisions in the best interests of our Company. You must be careful when engaging a business partner of our Company for private purposes.

Investments

You must also carefully consider and avoid investments that could affect your decision making on behalf of our Company. A conflict of interest in this context may arise if you invest in one of our suppliers, customers, business partners, or competitors.

Outside Employment

You may engage in outside employment or serve as a director of another company. However, the outside employment must not interfere with your ability to objectively make decisions for our Company.

Friends and Family Members

Potential conflicts of interest may also arise when dealing with friends and family members. Particular attention must be given when the friend or family member works for a competitor, customer, or supplier. In addition, these relationships may have an impact on your ability

Q&A

Q: During the course of my work, I invented a new design that I think may be of interest to some of our customers. Since I came up with the design, can I market it directly to them?

A: No. Any intellectual property you invent as part of your job belongs to our Company. Also, the design you developed using our Company's resources presented you with a valuable business opportunity. You may not take personal advantage of such an opportunity.

to effectively manage employment relationships. You must ensure that the friendship or family relationship does not interfere with the ability to make decisions in the best interests of our Company.

Disclosure

The best approach is to avoid potential conflicts of interest whenever possible and disclose situations that might create even the appearance of a conflict of interest to the HR or Compliance Department. Once disclosed, the potential conflict of interest can usually be managed and eliminated.

Our Conflict of Interest Policy provides a more complete explanation of how we uphold this commitment.



Upholding Financial Responsibility

Our customers, suppliers, business partners, and others rely on accurate financial information provided by us. Further, we are required to maintain accurate records to satisfy legal, tax, and regulatory requirements. We strive to achieve and maintain high standards of integrity and accuracy concerning our records. Inaccurate or incomplete records can endanger our existence and damage our reputation. The dishonesty of only one individual may negatively impact the trust that exists between us and our stakeholders. We must all take responsibility for the accuracy of our financial records.

Financial Reporting

Our policy is to maintain effective internal control systems to ensure compliance with laws and regulations and prevent misuse of our assets. Our internal controls also allow us to provide full, fair, accurate, and timely disclosures in reports and documents provided to third parties, such as government entities, customers, and vendors. You are expected to know and follow our internal controls to ensure that our financial reports are accurate. You should also be alert for any suspicious financial transactions.

Due to the importance of accurate financial reporting, you must follow all internal controls, even if it slows down your ability to manage our business. However, if an internal control prevents you from effectively managing our business, you should raise the issue with the Finance & Accounting Department so that they can explore workable alternatives.

Our Anti-Fraud Policy provides a more complete explanation of how we uphold this commitment.

Accurate Records

Ensuring accurate records is everyone's responsibility – not just the job of the Finance & Accounting Department. You are expected to maintain accurate and complete internal records of all business activities and obtain all required authorizations and documentation of transactions and commitments with business partners.

Q&A

Q: We recently received several large supplier invoices. My boss asked that I record them in the next quarter because it would improve our financial results. Should I follow her instructions?

A: No. Delayed reporting of expenses would lead to overstated earnings and could affect our financial results. Even if it is done with the intention of helping our company, it is a violation of our Code of Conduct.

This includes not only financial transactions, but other records such as quality reports, time records, and submissions such as benefit claims. Never falsify any document and do not distort the true nature of any transaction.

Our Anti-Fraud Policy provides a more complete explanation of how we uphold this commitment.

Insider Trading

At times, you may gain access to confidential information about our business operations. This inside information, if used to buy or sell stocks, is illegal and the penalties can be severe. Inside information is information not known to the public that could affect the price of stock, such as sales figures, major reorganizations, acquisitions, and conclusion of major contracts.

Therefore, if you have inside information, you are prohibited from making investments until that information becomes public and investors have had

Q&A

Q: I learned some information in a meeting with one of our customers that could affect its stock price. I know my brother owns stock in the customer. Can I share the information with my brother since it won't benefit me personally?

A: No. The law not only prohibits you from buying or selling stock based on inside information, it also prohibits you from tipping off anyone in order for them to buy or sell stock.

a chance to evaluate it. Similarly, you are not permitted to share inside information if the recipient is not entitled to receive it. This even includes relatives and close friends. Sometimes disclosure of inside information is required for business purposes. In those cases, the recipient must sign a confidentiality agreement to prevent the misuse of the information.

Our Conflict of Interest Policy provides a more complete explanation of how we uphold this commitment.



Maintaining Confidentiality and Privacy and Communicating Carefully

Given the nature of our business, we will have access to confidential and proprietary information of our own and our customers, suppliers, vendors, and employees. We must protect our confidential and proprietary information to maintain our unique competitive advantage. It is also imperative that we maintain the confidentiality of confidential and proprietary information of third parties to maintain the trust of our business partners. The financial consequences of a disclosure of confidential and proprietary information can be severe.

Confidentiality

Like our other assets, confidential information is a valuable part of our business and the business of our suppliers, vendors, and customers. We must always uphold our promise and contractual obligations to keep the confidential information of others safe, secure, and confidential.

Our Confidential Information

Confidential information must not be shared with anyone outside of our Company, unless it is required by law or for an authorized business purpose. This obligation of confidentiality applies even if your employment has ended. Confidential information should only be shared internally on a need to know basis and access should be appropriately restricted.

When working with our suppliers, customers, and other business partners, it is essential that we protect our confidential information. Confidential information may only be used and shared as authorized by our Company. Before disclosing confidential information to anyone

Q&A

Q: What can I do to protect our Confidential Information?

A: There are many steps you can take to protect our Confidential Information. You should treat documents that contain Confidential Information with care, such as not leaving these documents unattended. You should not leave your electronic devices unattended for long periods of time, especially during travel. You should also avoid discussing Confidential Information in public areas.



outside our Company, our employees must ensure that the recipient is entitled to receive such confidential information and determine whether the appropriate protections, such as a non-disclosure or confidentiality agreement, are in place with the other person.

Third Party Confidential Information

Similarly, the confidential information of third parties must be protected. This is an ethical, and in most cases, a legal and contractual obligation. You must take steps to understand our obligations regarding the confidential information of third parties, which may be included in a non-disclosure or confidentiality agreement. We do not tolerate the illegal use of another party's confidential information and intellectual property. We only use third party confidential information if it has been obtained by lawful means. Third party property rights, such as patents and trademarks, must be respected and may only be used with the permission of that third party.

Our confidential information and that of our suppliers, vendors, and customers can be inadvertently disclosed as a result of cybersecurity breaches. You must follow the practices and processes we have in place to protect our networks, computers, and data from attack, damage, or unauthorized access.

Careful Communication

As a company, we must make sure that we share information that is consistent, accurate, and complete.

It is important that all written communications be prepared with care and with the understanding that they may be made public or unexpectedly shared with other parties.

Authorized Communications

You must not share information on behalf of our Company unless you are authorized to do so. This is important to ensure that information conveyed to the public and to regulatory authorities is accurate and complete. If outside the scope of your job duties, requests for financial information should be forwarded to the appropriate department. Requests for information from government and regulatory agencies must be forwarded to the Legal Department.

Social Media

The use of social media creates unique challenges. Our company does not wish to regulate the personal affairs of our employees. However, if not stated clearly, personal opinions may appear to be the opinions of our Company. To avoid this situation, when using social

Q&A

Q: I recently found inaccurate information on social media about our financial situation. I would like to leave a comment to correct the information. Can I do this?

A: No. You should notify the Compliance Department of the false information to determine whether a response is necessary and appropriate.

media, you must clearly state that opinions expressed about our Company are your own and do not reflect those of our Company. You must also not post anything that is confidential business information, discriminatory, or would be a threatening, intimidating, harassing, or bullying.

If you see comments or posts on social media that are inaccurate or unfairly represent our Company, the information should be shared with our Legal or Compliance Department to determine the best course of action.

Privacy

We are committed to ensuring the privacy of our employees' personal information and will take appropriate steps to ensure that this information is kept safe and secure. In particular, as a result of certain employees' roles, some employees may have access to confidential health information of other employees. Extra care must be taken to securely access and store our employees'

Q&A

Q: I work in the HR Department, and a company recently asked me for the home addresses for all of our employees so that they could share beneficial tax information to our employees. Since our employees would benefit from the information, can I share our employees' home addresses?

A: No. Our employees' home addresses are private information and should only be shared for legitimate business purposes.

personal information. We must carefully consider who should receive or have access to this personal information. Access should be limited to only those employees that need to know. Personal information should only be retained for so long as is necessary to accomplish the purpose, comply with our document retention policy, and comply with the law.



Being Healthy and Safe and Preserving the Environment

It is essential to our business that we work in a safe and clean environment and produce high quality, safe products. We are committed to meeting or exceeding all health, safety, and environmental laws and regulations that apply to us. We must look out for each other, follow our safety procedures, and promote a culture of safety and environmental responsibility.

Occupational Safety and Health

We are committed to the safety and health of our employees. We provide safety and health protections that meet or exceed the

Q&A

Q: I noticed a potential safety hazard, but it's only minor. We have an important deadline to meet and reporting the hazard would cause a delay. Can I wait to report the hazard until after we meet our deadline?

A: No. Never compromise when it comes to safety. Safety issues should always be reported and addressed promptly.



applicable regulations. We believe in a culture of accident prevention and risk awareness. At all times, work to keep yourself and your co-workers injury-free, and if you see a situation that could put others at risk, take action. Remember that failure to take action when someone is at risk could result in severe injury or even death. Whether you spend your day in one of our manufacturing facilities, work in an office building, or spend time travelling, everyone must promote a culture of health and safety and actively take steps to preserve our employees' health and safety as well as the health and safety of our visitors, customers, vendors, and guests.

Workplace Violence

We have a zero-tolerance policy for workplace violence, threats, or intimidation. Be alert to what is going on around you, observe our security practices, and speak up if you have observed or have concerns about violence. If you have a disagreement with a fellow employee, resolve it calmly and seek help, if needed. We prohibit weapons on all of our properties in accordance with the law. If you have concerns that someone may illegally have a weapon on our property, report it immediately.

Drugs and Alcohol

Drugs and alcohol pose special problems in our workplace. Having, using, or distributing alcohol or illegal drugs at work is strictly prohibited by our Policies because use of such drugs can impair your



judgment and the safety of your co-workers. If you are found to be under the influence of illegal drugs or alcohol at work or test positive for illegal drug use, you will lose your job. Make sure you read our Policies and speak up if you suspect someone is working under the influence of drugs or alcohol.

Our Substance Abuse and Testing Policy provides a more complete explanation of how we uphold this commitment.

High Quality, Safe Products

We must always strive to provide products that meet or exceed the quality and safety expectations of our customers and comply with all applicable laws and regulations. Therefore, it is essential that we place the highest priority on quality and safety, establish high standards, and promptly and appropriately respond to quality and safety concerns. Product quality and safety depend on all of us, and we must all continually strive to ensure our products are of high quality and safe.

Environmental Protection and Sustainability

Long term success can only be achieved by sustainable business practices that aim to minimize the negative impact, or have a positive effect, on the environment. We must make appropriate and economical use of our natural resources and ensure that our activities have limited negative influence on the environment. We must comply with laws and regulations, our Policies, and

internal standards related to environmental protection and engage in resource conservation, energy conservation, and recycling. We must strive for a culture of environmental sustainability through effective risk management, responsible and proactive decision-making, and innovation. Environmental protection is a key consideration to be fostered in the overall approach to our business.



Supporting Diversity, Inclusion, and Human Rights

We are all part of one team, but we represent many different ideas, experiences, and backgrounds. We value our employees' unique contributions and believe that everyone should have an equal chance to succeed. We must continually strive to hire and promote a diverse workforce so that we can realize the benefits of distinct ideas and perspectives. We also recognize our responsibility to take steps to ensure that employees around the world are treated with dignity and respect.

Diversity and Inclusion

A diverse workforce can provide unique competitive advantages in our industry by increasing creativity and innovation and improving decision making. To fully realize these benefits, it is important for us to attract employees and build teams with diverse backgrounds. We must also strive to understand and value the differences each employee brings to our Company.

Respect

To promote the expression of unique ideas, we must always treat each other with respect. Healthy discussion is encouraged, but it must be done in a way that is respectful and encourages collaboration. Each of us has the right to a workplace in which our unique perspectives are welcomed and valued. Everyone is encouraged to keep an open mind to new ideas and points of view.

Discrimination and Harassment

Discrimination and harassment of our employees is strictly prohibited. No one may be disadvantaged, favored, or harassed as a result of race, ethnic origin, skin color, nationality, sex, religion, disability, age, sexual orientation, gender identify, or other characteristics protected by law. We are committed to providing reasonable accommodations for employees and job applicants with disabilities.

Further, all forms of workplace harassment, such as sexual harassment, are strictly prohibited. No one is

Q&A

Q: My manager often loses his temper and yells at all the people on his manufacturing line. Is that harassment?

A: It depends, but regardless, the situation creates a negative work environment. This behavior should be addressed because it is not respectful behavior.

expected to tolerate harassment, even if the alleged harasser believes that his or her behavior is acceptable or non-offensive or whether the alleged victim would be capable of avoiding the harassment. Workplace harassment can take many forms and be experienced differently from one individual to another. As a result, we must always maintain our high standards of professional conduct, including when working with customers, business partners, during business hours and after hours, and in all business settings.

Harassment can also take the form of an abuse of power over subordinates. We expect all managers to treat their subordinates with respect and dignity at all times. While managers must sometimes deliver constructive criticism and encourage better performance, the message must be delivered in a manner that is respectful and maintains a positive work environment. Intimidation, insults, and verbally abusive comments will not be tolerated.

Q&A

Q: One of my co-workers emailed a sexually explicit joke to our whole team. I find it offensive, but no one else seems to care. Should I say something?

A: Yes. Each of us has a responsibility to promote a respectful and non-offensive workplace. If you feel uncomfortable speaking directly with your co-worker, contact your manager or the HR Department.



Our Equal Employment Opportunity Policy and our Anti-Harassment Policy provide a more complete explanation of how we uphold this commitment.

Human Rights

We are committed to fair employment practices everywhere we operate and across our entire supply chain. We will not knowingly conduct business with any individual or company that participates in the exploitation of children, physical punishment, forced or prison labor, or human trafficking. We expect that our suppliers, vendors, and customers share our commitment to these same standards. You must be alert to potential abuses and speak up if there is a suspicion of possible human rights violations.

Q&A

Q: I recently saw a news article that says a supplier is known to use child labor. I believe we are considering contracting with this supplier, but I don't work in the Purchasing Department. Is it my place to say anything?

A: Yes. Selecting a supplier that has a history of human rights violations could put our Company at risk. You should tell the head of the Purchasing Department or report your concern to the Legal or Compliance Department.

Fulfilling Our Trade Obligations

As a company conducting business that crosses our country's borders, it is critical that we know and follow the trade laws that regulate our business. If your job duties involve the movement of products, information, or technology across international borders, you must make sure you know and comply with the requirements of the countries involved. Remember that the laws of more than one country may apply. Our compliance with these laws is a critical component of our Company's reputation and success.

Accurate Documentation

Customs laws require accurate documentation and proper reporting, valuation, and classification of goods. You must make sure that anything intended for import or export is classified correctly and accurately. The shipments must include all required documentation, labeling, licensing, permits, and approvals.

Trade Restrictions and Boycotts

We are committed to complying with all trade restrictions and boycotts imposed by the government. Such restrictions prohibit our Company from engaging in certain business activities in specified countries and with certain individuals and businesses. For example,

these individuals or businesses include identified terrorist organizations and narcotics traffickers. Sanctions for not meeting these requirements can be severe, including fines and imprisonment for the responsible individuals, and our Company may be prohibited from further participation in certain trade.

Trade Embargos

We do not do business with countries that are subject to a trade embargo. We also comply with anti-boycott laws and do not participate in any international boycott that is not sanctioned by the government. Any requests to engage in an unsanctioned boycott must be immediately reported to the Legal or Compliance Department.





If you have any questions about our Code of Conduct or our Policies, please contact a member of the Legal or Compliance Department. You can also make an inquiry through our anonymous compliance and ethics hotline.

We support our employees' rights to speak out publicly about matters of public concern or engage in certain activities related to the terms and conditions of their employment. Nothing in our Code of Conduct or in any of our Policies is intended to limit or interfere with the right to engage in concerted activities protected under the National Labor Relations Act or other applicable laws.

Our Code of Conduct does not alter the terms and conditions of your employment. It does not constitute an employment contract or an assurance of continued employment.

Please note that we may make changes to our Code of Conduct or our Policies at any time.



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