

Maxitrol Code of Conduct

This Code of Conduct (the “**Code of Conduct**”) shall apply to suppliers, vendors, and other business relations (each, a “**Company Partner**”) of the Maxitrol Company and its affiliates and divisions (“**Maxitrol**”). This Code of Conduct is subject to modification at Maxitrol’s discretion. All Company Partners shall comply with the provisions of this Code of Conduct, as updated from time to time. Company Partners are also responsible for compliance with this Code of Conduct by all of its suppliers, vendors, and other business relations.

Laws and Regulations

Each Company Partner shall comply with the laws and regulations applicable to such Company Partner in all locations where it conducts business.

Corruption, Bribery, and Ethics

Maxitrol strongly forbids any and all forms of corruption or bribery, and its Company Partners shall conduct business in accordance with the highest ethical standards. Company Partners shall strictly comply with all laws and regulations relating to bribery, corruption, prohibited business practices, and the like.

Company Partners shall avoid conflicts of interest and operate honestly and ethically throughout the supply chain and in accordance with applicable laws and regulations, including, but not limited to, laws pertaining to anti-competitive business practices, respect for and protection of intellectual property, company and personal data, export controls, and economic sanctions.

Human Rights

Company Partners shall respect human rights and mitigate human rights impacts that the Company Partner causes, contributes to, or is linked to, directly or indirectly, in accordance with applicable (including international) standards, including, but not limited to, the core conventions of the International Labour Organization (ILO) and the United Nations Guiding Principles on Business and Human Rights.

Forced Labor

Company Partners shall not, directly or indirectly, use forced or involuntary labor of any type, including, but not limited to, prison labor, bonded labor, or otherwise. Company Partners shall not, directly or indirectly, engage in human trafficking. Company Partners shall ensure their employees understand the terms of their employment.

Child Labor

Company Partners shall not, directly or indirectly, use child labor. The term "child" refers to any person employed under the age of 16, under the age for completing compulsory education, under the minimum age for employment in the country, or under the age specified by ILO Convention Nos. 138 and 182 (including with respect to work which by its nature or the circumstances in which it is carried out is likely to jeopardize the health, safety or morals of children), whichever is greatest. Each Company Partner shall comply with all workplace or employment standards and conventions regarding minimum working age or child labor in effect where such Company Partner maintains operations.

Harassment and Discipline

The personal dignity, privacy, and personal rights of every individual shall be respected. Company Partners shall not engage in any form of harassment, coercion, remarks, or other abusive conduct directed at an employee because of an individual's race, religion, height, weight, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation, veteran status, disability, or other legally protected category (each a, “**Protected Category**”). All disciplinary measures should be recorded in accordance with commercially reasonable record-keeping procedures.

Retaliation

Company Partners shall prohibit retaliation. Company Partners shall provide an adequate mechanism for their employees to report integrity concerns, safety issues, harassment, and misconduct without fear of retaliation. Company Partners shall appropriately investigate reports and take corrective action, if needed.

Non-Discrimination

It is the Company's philosophy and policy to treat all persons according to their individual merit, and without regard to any Protected Category. Company Partners shall not discriminate in its employment practices on the grounds of any Protected Category, including, but not limited to, with respect to recruiting, hiring, pay rates, training and development, placements, promotions, terminations, and all other terms and conditions of employment.

Wages and Benefits

Company Partners shall comply with all applicable wage and hour laws and regulations, including, but not limited to, those relating to minimum wages, classification, overtime hours, piece rates, and other elements of compensation, and shall provide all legally mandated benefits.

Hours of Work

Company Partners shall comply with all applicable working hours and overtime laws and regulations. Company Partners shall not exceed prevailing local work hours and shall appropriately compensate overtime. Unless National, or Federal, regulations require less maximum hours of work, and except under extraordinary business circumstances, employees of Company Partners shall not, on a regularly scheduled basis, be required to work a standard work week of more than forty hours per week or a total work week of more than sixty hours (including overtime); provided, that in countries where the maximum work week is less, that standard shall apply. Employees of Company Partners shall be provided at least one day off in every seven-day period.

Health and Safety

Company Partners shall provide their employees and contractors with a safe and healthy workplace in compliance with all applicable laws and regulations. Without limiting the generality of the foregoing, Company Partners shall have and implement effective programs that maximize accident prevention, life safety, incident investigation, chemical safety, ergonomics, and other similar matters, and provide the same standard of health and safety in any housing that is provided for its employees. Company Partners shall have and implement management systems to meet these requirements, including, but not limited to, employee training. Company Partners shall continually review risk factors and hazards in the workplace. Company Partners shall provide workers adequate and appropriate personal protective equipment to protect workers against hazards typically encountered in their scope of work.

Freedom of Association and Collective bargaining

Company Partners shall respect the legal rights of employees to have freedom of association and to join or to refrain from joining worker organizations, including, but not limited to, and collective bargaining and trade unions. Company Partners shall establish favorable employment conditions and maintain effective employee communication programs as a means of promoting positive employee relations that make employees view third-party representation as unnecessary.

Environment

Company Partners shall operate in a manner that is protective of the environment. Without limiting the generality of the foregoing, Company Partners shall comply with all applicable environmental laws, regulations, and standards, including, but not limited to, requirements regarding chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits, environmental reporting, and all environmental requirements specific to the products or services being provided to Maxitrol. Company Partners shall implement management systems to meet these requirements.

Company Partners shall minimize environmental pollution shall, and environmental protection shall be improved continuously. Company Partners shall increase efficiency and take reasonable measures to reduce their carbon footprint, energy use, water use, wastes, and other emissions. Company Partners shall conserve resources and protect the communities and environment that surround them and shall develop and diffuse environmentally friendly technologies and to increase the use of renewable energies.

Conflict Minerals

The Securities and Exchange Commission (“**SEC**”) has adopted rules requiring publicly traded companies to report on products they manufacture or contract to manufacture that contain certain minerals (“**conflict minerals**”) under circumstances that contribute to or support human rights violations. The European Union and other international bodies have adopted substantially similar rules and regulations. Awareness and cooperation among supply chain participants is essential to any responsible sourcing initiative. By holding Company Partners accountable for the principles in this section, Maxitrol believes its conflict minerals program will help drive necessary transparency in the supply chain and meet the requirements of its customers. Accordingly, Company Partners shall actively support Maxitrol’s conflict minerals compliance efforts by: (i) adopting responsible mineral sourcing policies in dealing with their supply chains that are consistent with this section; (ii) supplying products to Maxitrol that do not contain conflict minerals that have been sourced under circumstances that contribute to or support human rights violations; and (iii) providing evidence to support their representations as to the conflict minerals status of their products upon request.

Record Keeping; Reporting

Company Partners shall develop and implement appropriate internal business processes and policies to ensure compliance with applicable laws and regulations and this Code of Conduct. Company Partners shall self-report any violations of this Code of Conduct. Company Partners shall maintain documentation necessary to demonstrate compliance with this Code of Conduct and shall provide Maxitrol with access to that documentation upon request. Upon request, Company Partners shall demonstrate compliance with this Code and shall take any action requested by Maxitrol to correct any non-compliance.

Maxitrol may periodically audit Company Partners to confirm compliance with this Policy. Company Partners shall cooperate with Maxitrol’s requests for information, documentation, certifications, and/or audit access.

When Maxitrol is concerned any Company Party is in violation of this Code of Conduct, Maxitrol’s practice is to work with the Company Party. However, any violation of this Code of Conduct shall be immediate grounds for Maxitrol to terminate any relationship with the Company Partner.