



## **MELLING TOOL COMPANY**

### **Supplier Code of Conduct Policy**

MELLING since 1944 has built a reputation of honesty, integrity and fairness by conducting our business according to the highest ethical standards. The MELLING Supplier Code of Conduct embody these core values and reflect MELLING's commitment to operate with the highest level of integrity. Melling expects our business partners to share in these same core values and business practices.

This Supplier Code of Conduct governs any company or entity that sells or seeks to sell any products or services to MELLING and/or any of its affiliates whether directly or indirectly through its employees, affiliates, agents, subcontractors, distributors, or any other representatives (defined hereafter as "Suppliers"). MELLING also expects its Suppliers to comply with all applicable laws and regulations. It is also the expectation that all of the above "Suppliers" providing products or services to MELLING or to MELLING's customers on behalf of MELLING read and comply with the MELLING Supplier Code of Conduct.

MELLING is a global company and conducts business in various countries throughout the world. MELLING Suppliers must comply with applicable laws, rules and regulations in all countries where MELLING and its affiliates conduct business. Specifically, we expect all MELLING Suppliers to adhere to the following:

- **FAIR LABOR / DISCRIMINATION:** MELLING expects its suppliers to ensure fair labor conditions, treating employees with respect and dignity and in particular you will refrain from any unlawful harassment. To the extent prohibited by applicable law, Suppliers will not discriminate against any person because of their race, color, sex, religion, national origin, age, disability, sexual orientation, gender identity, genetic information, veteran status, or any other basis.
- **CHILD LABOR:** Suppliers will not directly or indirectly employ workers that are younger than the applicable required minimum age.
- **FORCED LABOR:** Suppliers will not knowingly source materials from supply chains associated with human trafficking and will take reasonable efforts to ensure that their own suppliers comply with this requirement.
- **COMPENSATION AND WORKING HOURS:** Suppliers must comply with all applicable wage and hour laws, including those relating to minimum wage, overtime hours, and other elements of compensation, and must provide all legally mandated benefits. Suppliers will ensure working hours, including overtime do not exceed applicable legal requirements and where such requirements do not exist, we recommend that working hours not exceed sixty hours per week

including overtime, and ensure that employees are allowed at least one uninterrupted day off per week.

- **FREEDOM OF ASSOCIATION:** Suppliers must respect workers' rights to associate freely and in compliance with existing local laws and without intimidation, reprisal or harassment.
- **HEALTH AND SAFETY LAWS, ENVIRONMENTAL:** Suppliers must comply with all applicable, health and safety laws and environmental regulations, and must provide workers with a safe and healthy work environment and conduct your business in an environmentally sustainable way. Establish appropriate organization structures and procedures for the effective management of health, safety and environmental risks; and ensure workers are sufficiently aware of these risks and appropriately trained on the implementation of control measures. Suppliers must strive to reduce their negative impact on the environment through the conservation of natural resources, reduced energy consumption and other means. While a Supplier, its affiliates, agents or representatives are on-site at any MELLING location or at an MELLING customer location on behalf of MELLING, Supplier shall comply with MELLING policies and applicable site requirements.
- **GIFTS AND IMPROPER PAYMENTS:** Suppliers are prohibited from engaging in corruption, extortion or embezzlement in any form. Suppliers must comply with all applicable anti-corruption laws and regulations of the countries in which they operate such as the U.S. Foreign Corrupt Practices Act, and as applicable, the UK Anti-Bribery Act, the OECD Anti-Bribery Convention and any other international anti-corruption conventions. Suppliers will not offer or accept bribes or employ other means to obtain an undue or improper advantage specifically when in negotiations with any employee of MELLING. Bribes, kickbacks, facilitating payments and similar payments to government officials or to MELLING employees or agents acting on MELLING's behalf are prohibited. MELLING employees are discouraged from accepting gifts of more than \$100 in value or lavish entertainment from suppliers. When business meals and entertainment are appropriate to further business relationships, those expenses may not be extravagant in nature. Gifts of money are never to be offered.
- **INTERNATIONAL ACTIVITIES:** Suppliers must comply with all export-import laws, customs duties and all other laws pertaining to their international business activities.
- **FAIR DEALINGS AND COMPETITION LAWS:** Suppliers should not take unfair advantage of anyone else through manipulation, concealment, abuse, and misrepresentation of material facts or any other unfair dealing. Supplier will not engage in collusive bidding, price fixing, price discrimination or other unfair trade practices in violation of applicable antitrust and competition laws. Supplier will uphold fair business standards in advertising, sales and competition. Suppliers must disclose to MELLING information regarding potential conflicts of interest relating to your activities as a supplier, including disclosure of any financial interest a MELLING employee may hold in your business.
- **CONFIDENTIALITY / INTELLECTUAL PROPERTY RIGHTS:** Suppliers must protect the Confidential Information entrusted to them by MELLING, its affiliates, customers or suppliers. Confidential Information may only be used and disclosed in a manner authorized by MELLING. Confidential Information includes any business information of MELLING, its customers or suppliers that is not generally known to the public. As it pertains to Intellectual Property; Suppliers must respect and

refrain from infringing upon the intellectual property rights of others, including patents, trademarks, copyrights and other proprietary rights, protect all confidential information provided by MELLING and our respective business partners.

- **CONFLICT MINERALS:** MELLING is committed to complying with federal laws and regulations requiring disclosure of the use of conflict minerals and expects the same commitment from its Suppliers. Upon request of MELLING, Suppliers shall determine whether any products provided by Suppliers contain material that is designated under applicable rules of the Securities and Exchange Commission as a “conflict mineral.” Seller shall also take such necessary actions and provide such additional information in the format requested by MELLING as may be necessary in order for MELLING to be or remain compliant with applicable laws, rules and regulations relating to conflict minerals. Reference: Melling Tool Company Supplier Manual via our corporate website. [www.melling.com/suppliers](http://www.melling.com/suppliers) portal for complete details.
- **VISITING or WORKING:** When visiting or working at MELLING Locations, Suppliers must abide by MELLINGS Visitor/Contractor procedures and Insurance requirements. It is the expectation that any security concerns will be provided to the appropriate MELLING representative.
- **MONITORING COMPLIANCE:** Suppliers must establish and maintain a process of ensuring compliance with the MELLING Supplier Code of Conduct. This includes communicating the requirements of this Code to all employees, affiliates, agents and subcontractors of the Supplier. Supplier must maintain all documentation necessary to demonstrate its compliance with the MELLING Supplier Code of Conduct. Upon MELLING’s request, Supplier should be prepared to provide MELLING or its affiliate’s access to such documentation. To verify your compliance, we reserve the right to audit and inspect your operations and facilities, at our own cost and upon reasonable notice, with or without support of a third party. If the results of such an audit or inspection cause us to be of the opinion that you do not comply with this MELLING Supplier Code of Conduct, you shall take necessary corrective actions in a timely manner, as directed by us. If you fail to comply with this MELLING Supplier Code of Conduct, then we may take action against you, including suspending or terminating your activities as one of our suppliers. MELLING Supplier Code of Conduct.
  - A) Access to remedy in the context of our business relationship, if you or your employees believe that the terms of this MELLING Supplier Code of Conduct are not adhered to, or that MELLING is not acting in accordance with its own MELLING Code of Conduct, then we encourage you to raise your concerns via the MELLING stakeholder reporting channels.

MELLING Thanks you

Sincerely

John Shellberg  
Purchasing Manager

PUR-WIS-0007  
Date: 9/24/18  
Revision: 2.0