

VALTO, INC. SUPPLIER CODE OF CONDUCT

At VALTO, we are committed to a standard of excellence in every aspect of our business, to ethical and responsible conduct in all of our operations, to the respect of the rights of all individuals, and to respect for the environment. We expect the suppliers (as well as permitted subcontractors) who do business with VALTO, to share these same commitments. VALTO strongly encourage each Supplier to meet the following standards in all activities that relate directly or indirectly to VALTO.

We will evaluate a Supplier's compliance with these standards in determining whether to grant or continue approved status for such Supplier. Suppliers that do not conform to these standards may be disqualified from approved status and/or have their business relationship with VALTO terminated.

Compensation

Supplier must comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime, and other elements of compensation, and will provide all legally mandated benefits.

Hours of Labor

Supplier will maintain work hours in compliance with all applicable wage and hour laws and regulations. Supplier will not require employees to work more than any limits on regular and overtime hours allowed by any applicable local law.

Coercion and Harassment

Supplier will treat each employee with dignity and respect, and will not engage in or permit corporal punishment, threats of violence, or other forms of harassment whether based on race, color, gender, sexual orientation, national origin, religion, disability, age, or any other legally protected characteristic.

Discrimination

Supplier will not discriminate in hiring practices or any other condition of work on the basis of race, sex, sexual orientation, color, age, gender, national origin, physical or mental disability, religion, status as a disabled veteran, or other legally protected characteristics.

Workplace Safety & Emergency Planning

Supplier will provide a safe and healthy workplace for employees by endeavoring to meet or exceed international safety standards. Supplier must have procedures in place for handling emergencies such as fire, spills, and natural disasters.

Freedom of Association and Collective Bargaining

Employees who wish to join or not join trade unions and to bargain collectively shall not be interfered with, penalized or retaliated against.

Environmental Protection

Supplier will comply fully with all applicable environmental laws, and seek ways to conserve natural resources and energy, reduce waste and the use of hazardous substances, and minimize any adverse impacts on the environment.

Compliance with Applicable Laws; No Forced or Child Labor

Supplier will comply with all laws and regulations applicable to their business, as well as the standards of its industry, including those pertaining to the manufacture, pricing, sale, distribution, labeling, import, and export of merchandise. Without limiting this requirement,

Supplier will not violate, misappropriate or infringe upon the intellectual property rights of VALTO or any third party or engage in any activities which would violate any applicable laws and regulations relating to (a) human trafficking, (b) bribery or illegal payments, (c) laws against unfair competition, (d) unfair and deceptive trade practices, (e) the environment, (f) health and safety, (g) international trade, including exports and imports, (h) data privacy, (i) money laundering, (j) employment, (k) contracting with governmental entities, or (l) medical devices, if applicable. Supplier will not use or in any other way benefit from any form of child, prison, coerced or compulsory labor or other forms of forced labor, or any forms of slavery.

Commercial Bribery

Supplier will not bribe in any way any officer, director, manager, employee, representative or agent of VALTO, or any other entity, including without limitation, by offering or giving kickbacks or by offering or giving gifts of more than nominal value.

Accounting Records

Supplier's accounting records must (1) be kept and presented according to the laws of each applicable jurisdiction, (2) in reasonable detail, accurately and fairly reflect transactions, assets, liabilities, revenues and expenses, and (3) not contain any false or misleading entries.

Conflicts of Interest

Supplier must immediately report to VALTO, any "conflict of interest" of which they become aware. A "conflict of interest" is any circumstance, transaction or relationship directly or indirectly involving the Supplier in which the private interest of any employee of VALTO improperly interferes, or even appears to improperly interfere, with the interests of VALTO.

Subcontracting

In addition to any restrictions on the use of subcontractors that are otherwise agreed to between the Supplier and VALTO, Supplier will make reasonable efforts to communicate this policy to any subcontractors in connection with VALTO.

Suppliers of Materials incorporated into Products Sold to VALTO

For any materials incorporated into products sold to VALTO, the Supplier will make reasonable efforts to communicate this policy to any suppliers of materials in connection with VALTO business.

Monitoring and Compliance

Supplier understands that VALTO, or our designated agents (including third parties) may engage in monitoring activities to assess compliance with this Code of Conduct including on-site inspection of facilities and review of books and records. Neither VALTO or authorized agents assumes any duty to monitor or ensure compliance with this Code of Conduct, and Supplier understands that Supplier is solely responsible for full compliance with this Code of Conduct by its officers, directors, managers, employees, representatives and agents.

Management System and Communication

Supplier must establish and maintain processes that are reasonably designed to ensure compliance with, mitigate the risks identified in, and facilitate continuous improvement with respect to, this Code of Conduct.

Supplier must ensure that this Code of Conduct is adequately communicated to all employees. Supplier should immediately notify VALTO through the Ethics Reporting Hotline at 331.208.9815 or via e-mail at ethics@valtoem.com upon learning of any known or suspected improper behavior by Supplier or by employees of VALTO.

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