

# DOING BUSINESS WITH OATEY

## *Supplier Code of Conduct*

Throughout our history, Oatey proudly has been an industry leader in conducting business in an ethical manner that is also environmentally and socially responsible. Part of the company's mission is to be proactive in health, safety, and environmental matters. Our core beliefs include promoting corporate and individual civic responsibility, and conducting all aspects of our business with honesty, integrity, and humanity.

This *Code of Conduct* provides a guide for what we expect from our suppliers. We reserve the right to use audits, both announced and unannounced, to ensure that our suppliers are sharing in these values and beliefs, and we will direct our business away from those who do not. From time to time, we may revise this policy; the current version will be available on the "Supply Chain Information" link on the Oatey.com webpage..

### ***Our Requirements***

Oatey will not conduct business with suppliers who do not abide by the following principles.

#### 1. ETHICS/CORRUPTION

Suppliers will not engage in corruption, including extortion or bribery, nor will they engage in conduct prohibited by the Foreign Corrupt Practice Act (15 U.S.C. § 78dd-1 *et. seq.*), the U.K. Bribery Act of 2010, or other similar anti-bribery laws and regulations.

#### 2. WORKER RESPECT AND DIGNITY

Suppliers will not subject workers to harassment, intimidation, physical or mental abuse, or corporal discipline.

#### 3. DISCRIMINATION

Suppliers will uphold equal employment opportunities and refrain from employment discrimination in any form unless national law expressly provides for selection criteria. Employment discrimination based on gender, race, national origin, religion, age, or sexual orientation is not acceptable.

#### 4. CHILD LABOR

Suppliers will not support or use child labor, which means using any labor that is:

- Under the minimum age specified by local or national law; or
- Under 14 years old

#### 5. OPEN COMMUNICATION

Workers will be allowed to communicate openly with management regarding working conditions without the fear of retribution or intimidation.

#### 6. LABOR COMPENSATION AND REST

Suppliers will not support or use any form of forced or compelled labor. Workers will be allowed rest and shall receive compensation in compliance with all applicable rest and wage laws. When wage laws do not exist, workers will be compensated so that they can, at a minimum, meet their basic needs.

#### 7. WORKER SAFETY

Workers will be provided with safe workplaces that meet, at minimum, applicable local and national regulations and protect the workers' health and well-being. Worker housing, when provided, must meet the same safety standards that apply to the workplace.

#### 8. ENVIRONMENTAL COMPLIANCE

Suppliers will achieve environmental compliance with applicable environmental regulations, including air, water, and land use and disposal regulations. Oatey will favor suppliers who share its commitment to going above and beyond the legal requirements in this area.

#### 9. CUSTOMS-TRADE PARTNERSHIP AGAINST TERRORISM (C-TPAT)

Suppliers will agree to follow applicable C-TPAT processes so as to allow for the efficient and secure flow of imported and exported materials while protecting against the introduction of terrorists and weapons of mass destruction. C-TPAT procedures and best practices can be located at [www.cbp.gov](http://www.cbp.gov).