

This Supplier Code of Conduct applies to business entities, individuals, consultants, and contractors, and their respective directors, officers, contractors or agents, as applicable (collectively referred hereinafter “**Supplier(s)**”), that provide goods or services to Kuntz Electroplating Inc. (“**KEI**”)

KEI requires that Suppliers follow this Supplier Code of Conduct and expects Suppliers to develop and implement processes to ensure compliance with this document. KEI may terminate any contract it has with Supplier without any further liability in the event of violation by Supplier of this Supplier Code of Conduct.

Gifts and Entertainment

Suppliers must maintain the highest ethical standards. Suppliers must not offer cash, favours, gifts, entertainment, bribe, kickbacks or anything of value to any individual, business entity (including KEI) or government official, in return for an express or implied promise by the recipient to provide business benefit, or in violation of any Canadian or other jurisdictions’ laws, rules and regulations, including those with respect to anti-bribery and anti-corruption.

Conflicts of Interest

Suppliers must avoid placing themselves in any situation that conflicts with KEI’s interests or adversely influences their ability to ethically fulfill contractual obligations to KEI.

Trade Compliance

Suppliers must comply with all applicable trade control laws that regulate import and export of goods and services.

Confidentiality/Confidential and Private Information

Suppliers are responsible for protecting the confidential, private and proprietary nature of KEI’s information, which must be used for KEI’s business purposes only and used consistently with the terms set forth in agreements with KEI. Suppliers must comply with any and all applicable privacy laws, rules regulations and guidelines.

Communications

Communications with or on behalf of KEI must be appropriate for the intended audience, not contain any offensive or harassing language and not contain any language or information that violates any laws, rules, regulations or agreement with KEI.

Human Rights and Employment Laws

Suppliers must comply with employment laws, rules and regulations, applicable to wherever they operate in the world, including international labor standards and laws. Such laws, rules and regulations shall include those that govern freedom of expression, rights of association, privacy, equal opportunity, freedom from discrimination, fairness, dignity and respect without any form of physical, sexual, psychological or verbal abuse or harassment.

Suppliers must not use workers who are under the applicable minimum age for employment in any particular country. Additionally, Supplier must comply with all applicable child labor laws,

rules and regulations, and maintain official records relating to their workers' employment, including verification of workers' date of birth.

Suppliers will not engage in human trafficking or exploitation, or import goods tainted by slavery or human trafficking.

Suppliers must provide a safe working environment that promotes accident prevention, minimizes exposure to health risks, and complies with environmental laws, rules and regulations. Suppliers must remain in material compliance with all health and safety laws, rules and regulations applicable to the operation and use of the facilities where products are manufactured or stored on KEI's behalf.

Conflict Minerals

Suppliers must perform necessary due diligence to comply with any rules against "Conflict Minerals" as may be in place in the US, Canada or other jurisdictions.

Trademarks and Intellectual Property

Suppliers must comply with all applicable intellectual property laws, regulations and rules.

Competition Law

Suppliers must comply with all applicable laws, regulations and rules with respect to competition.

Sustainability

Suppliers must comply with all laws, rules and regulations relating to air emissions, water discharges, toxic substances and hazardous waste disposal. Suppliers must implement systems and processes to manage non-hazardous waste.

Monitory and Auditing of Books and Records

Suppliers are required to maintain complete and accurate books and records, and have system of internal controls, which shall be available for KEI's audit, to provide sufficient assurance to KEI that Suppliers are compliant with the above-noted guidelines.

Reporting Violation

Suppliers shall self-report any violations of the Code of Conduct. Suppliers can also submit questions and comments regarding the Code of Conduct to KEI's liaison set out below:

Jeff Regehr, Vice President - Finance
851 Wilson Ave., Kitchener ON, N2C 1J1, Canada
Phone: (519) 893-7680 x3098
Email: jeff.regehr@kuntz.com

Suppliers shall not retaliate or take disciplinary action against any worker who has, in good faith, reported violations or questionable behaviour, or who has sought advice regarding this Code of Conduct.