

EEMAX, INC.

SUPPLIER CODE OF CONDUCT

Eemax, Inc. (including its affiliates) (“Eemax”) is committed to providing quality products and conducting business honestly, fairly and with integrity. This Supplier Code of Conduct ("Code") applies to all suppliers who are part of Eemax’s supply chain and sets forth Eemax’s standards and expectations with respect to key areas of corporate responsibility.

COMPLIANCE WITH LAWS AND REGULATIONS

Eemax suppliers must comply with all applicable laws and regulations.

EMPLOYMENT PRACTICES

Eemax expects suppliers to respect its workers and to be in compliance with the specific requirements relating to employment and working conditions contained herein.

- Supplier will fairly compensate its workers, complying with all applicable laws and regulations governing wages and overtime payment for workers.
- Supplier will comply with all applicable legal limits for working hours and days of service and will not exceed the maximum set by applicable laws and regulations.
- Supplier will comply with all laws and regulations regarding the fair and humane treatment of its workers.
- Supplier will be committed to a workforce free of harassment and unlawful discrimination.
- Supplier must provide their workers with a safe and healthy working environment.
- Supplier will not use, directly or indirectly, forced, slave or child labor.

ENVIRONMENTAL

Suppliers shall comply with all applicable laws, regulations and international standards regarding environmental protection.

PRIVACY AND SECURITY

Supplier will commit to protecting the reasonable privacy expectations of personal information of everyone with whom it does business, including suppliers, customers and employees.

FCPA, ANTI-CORRUPTION AND BRIBERY

Supplier shall abide by all applicable anti-corruption regulations and laws of the countries in which it operates, including Foreign Corrupt Practices Act (“FCPA”) and applicable international anti-corruption laws, rules and conventions. Supplier shall not engage in any form of corruption, extortion, embezzlement, or bribery, including any payment or other form of benefit conferred on any government official for the purpose of influencing decision making in violation of law.

GIFT & GRATUITY POLICY; CONFLICT OF INTEREST

Eemax employees are prohibited from soliciting or accepting any gifts, gratuities or other monetary incentives that are designed to improperly influence business decisions or as a condition of doing business, and we expect our suppliers to adhere to these rules. Gifts should never be offered, given, or accepted by any Eemax employee if it:

- Is a cash gift or cash equivalent (such as gift certificates or gift cards);
- Exceeds \$250.00 in value in the U.S., Canada, Australia, and New Zealand or \$100 in all other locations (unless approved in advance by authorized management);
- It can be construed as a bribe, kickback or payoff;
- Is not reasonable and appropriate in the context of the business occasion; and
- Violates any laws or regulations.

Supplier will not put any Eemax employee in positions that test their loyalty to Eemax or cause violations of Eemax’s Code of Business Conduct & Ethics or the law.

CONFLICT MINERALS

Supplier will comply with all applicable laws and regulation, as well as applicable requirements, intended to address the humanitarian and commercial concerns, specifically as it relates to Conflict Minerals, including regulations passed by the Securities and Exchange Commission.

Eemax reserves the right, in its sole discretion, to change the requirements of this Code from time to time.

LAST UPDATED: September 27, 2017