

NEELTRAN, INC.

**71 Pickett District Road
New Milford, CT 06776
Tel: (860) 350-5964
Fax: (860) 350-5024**

Rev 1 September 14, 2018

Supplier Code of Conduct – Neeltran, Inc.

Neeltran, Inc. is family-owned and operated and has been in business since 1973. We are dedicated to our customers and employees. Our goal is to provide our customers with the best quality products and services offered in our industry and we are focused on continuously improving our products, employee skills, and facility. We have invested in engineering, technology, infrastructure, and human resources. In 2010, we completed a facility expansion that increased our manufacturing footprint and capacity to 85,000 square feet in support of our strong and consistent growth.

In support of our mission and as part of our commitment to high standards for integrity, ethics and sustainability efforts, we have developed the Supplier Code of Conduct that outlines the minimum standards for Neeltran, Inc. suppliers, business partners, suppliers and manufacturers. This Supplier Code of Conduct defines the main principles underlying your business activities as one of our suppliers. As appropriate, preference will be given to suppliers that demonstrate higher standards. Suppliers are expected to have appropriate management systems in place and take necessary steps to comply with this Code, including but not limited to being transparent concerning policies and practices and employee training. We encourage our suppliers to hold their suppliers accountable to these standards. Adherence with this Code may be subject to periodic review. As a supplier, you must comply with all applicable laws and regulations, the requirements set out in this Supplier Code of Conduct and your contractual obligations to us. Neeltran has a 'zero tolerance' policy when it comes to unethical business behavior, such as bribery, corruption and forced labor.

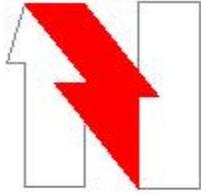
For the purposes of this document "Supplier" means any company, corporation or other entity that sells, or seeks to sell goods or services to Neeltran, Inc.

Compliance

Neeltran, Inc. suppliers must follow all relevant national and local laws and regulations, including those related to labor, health and safety and the environment. Suppliers are expected to inform Neeltran contact person or purchasing manager should there be any significant breaches, allegations of non-compliance or investigation into non-compliance by authorities related to any goods or services that such Supplier provides to Neeltran, Inc. that may materially affect a Supplier's ability to provide goods or services to Neeltran, Inc. in a manner consistent with this Code.

Human Rights and Labor

Neeltran, Inc. respects the personal dignity, privacy and rights of everyone. Suppliers should recognize and be committed to upholding the human rights of workers and treating them with dignity and respect.



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- **Freely Chosen Employment:** Forced, bonded or indentured labor or involuntary prison labor is not to be used. All work will be voluntary, and workers should be free to terminate their

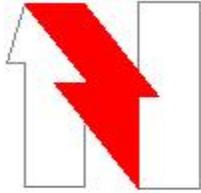
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- employment upon reasonable notice. Workers shall not be required to relinquish control of government-issued identification, passports or work permits as a condition of employment.
- **Child Labor:** Child labor is not used in any stage of the work performed by Neeltran, Inc. If the minimum employment age in a jurisdiction is not defined, the term “child” refers to any person employed under the age of 15 or under the age for completing compulsory education or under the minimum age for employment in the country.
- **Non-Discrimination:** As an organization supplying goods and/or services to Neeltran, Inc., you may be subject to national and local laws and accompanying regulations. To assure full compliance with such laws and regulations, all human resource actions including recruiting, hiring assignment and promotion as well as decisions affecting compensation, benefits, transfers and training shall be made without regard to race, color, creed, age, gender, sexual orientation, ethnicity, mental or physical disorder or disability, religion, political affiliation, health condition, pregnancy, union membership, marital status or any other status protected by Federal, State or Local regulations.
- **Human Treatment:** There is to be no inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or workers nor any threat of any such treatment. No activities shall contribute toward human exploitation, including but not limited to human trafficking and sexual exploitation of children.
- **Minimum Wages:** Compensation paid to workers shall comply with all applicable local wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.
- **Working Hours:** Work weeks are not to exceed the maximum set by local law.
- **Freedom of Association:** Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Suppliers will respect the rights of workers to freely associate, including the right to join a labor union or similar organization, and to communicate openly with management regarding working conditions without fear of reprisal intimidation or harassment.

Health, Safety & Environment

Neeltran is committed to providing a safe and healthy workplace and minimizing the impact of its operations and those of its Suppliers, on the environment. Suppliers are responsible for upholding a safe and healthy work environment. Suppliers shall comply with all laws, regulations and rules governing employee occupational health and safety in the jurisdiction where they operate.

- **Health & Safety Lead:** Formally appoint a competent person to manage health, safety and environmental programs and improvements. Establish appropriate organizational structures and procedures for the effective management of health, safety and environmental risks. Ensure that all workers are sufficiently aware of these risks and appropriately trained on the implementation of safety and control protocol.

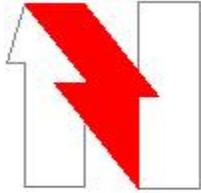


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- **Health and Safety of Employees and Visitors:** Supplier shall take necessary and appropriate steps to ensure the health and safety of employees, visitors and the general public in the communities where they operate.
- **Occupational Injury and Illness:** Procedures and systems must be in place to manage, track and report occupational injury and illness, including provisions as follows. 1. Encourage worker reporting; 2. Classify and record injury and illness cases; 3. Provide necessary medical treatment; 4. Investigate cases and implement corrective actions to eliminate their causes; and 5. Facilitate the return of workers to work. Employees should receive training on safety, including but not limited to, where appropriate, proper use of equipment, chemicals and use of personal protective equipment (PPE).
- **Environmental Permits and Registrations:** Suppliers must obtain, maintain and keep current all required environmental permits and registrations and follow the operational and reporting requirements of such permits.
- **Product Content Restrictions:** Suppliers must adhere to applicable laws and regulations regarding prohibition or restriction of specific substances including labeling laws and regulations for recycling and disposal.
- **Chemical and Hazardous Materials:** Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse or disposal.
- **Air Emissions:** Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge.
- **Pollution Prevention and Resource Reduction:** Waste of all types, including water, energy, raw materials and processed materials, is to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and reusing materials. Any wastewater or solid waste that is generated from operations is to be characterized, monitored, controlled and treated as required prior to discharge or disposal according to applicable standards and codes.
- **Environmental Management:** Suppliers must undertake ongoing efforts to improve in minimizing the environmental impact of their operations, products and services. Examples of considerations include reducing energy and water consumption, reducing gas emissions, reducing waste and pollution, reducing impact on biodiversity and ecosystems and reducing environmental impact of products during various lifecycle stages as applicable.



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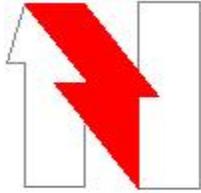
Ethics

Neeltran's Standards of Conduct requires that business be conducted with honesty and integrity and in compliance with all applicable laws. As such, it is our expectation that Neeltran Suppliers and their agents maintain high standards of ethics.

- ***Anti-Corruption, Extortion or Embezzlement:*** The highest standards of integrity are expected in all business interactions. All forms of corruption, extortion and embezzlement are strictly prohibited and may result in or subject a Supplier to immediate termination and legal actions.
- ***Disclosure and Privacy of Information:*** Means to effectively safeguard customer information and intellectual property regarding business activities, financial status, performance and/or any other information deemed confidential shall be implemented and such information shall be disclosed only in accordance with guidelines specified within any agreed upon non-disclosure agreement, privacy policy and as provided for by law.
- ***No Improper Advantage:*** Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted. No supplier, or its representative or employees, shall offer any employee a kickback or bribe. Suppliers should observe local custom with respect to gifts, although the value of such offers should never be considered material enough to influence business decisions or violate applicable regulations.
- ***Recordkeeping:*** Financial records shall be kept in accordance with all applicable accounting practices and comply with all relevant legal and regulatory requirements.
- ***Community Engagement:*** Neeltran is dedicated to the well-being of the communities in which we do business. Suppliers are encouraged to engage with their communities to help foster social and economic development and sustainability.

Secure Business

Suppliers shall conduct business in a secure and confidential manner. Specifically, Suppliers will do the following: 1. Implement reasonable measures for minimizing exposure of Neeltran to security threats such as terrorism, crime, pandemics and natural disasters; and 2. When visiting or working at Neeltran locations, abide by Neeltran's security procedures and report any security concerns to the appropriate Neeltran authority.



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Procurement of Supplier

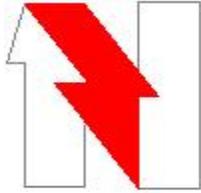
Suppliers will procure goods and services in a responsible manner. Specifically, Suppliers will do the following: 1. Select their own tier one Suppliers providing goods or services directly or indirectly to Neeltran based on them agreeing to adhere to standards comparable to those set forth in this Neeltran Supplier Code of Conduct; and 2. When working at Neeltran locations, only subcontract work with prior consent from Neeltran, Inc.

Material Compliance and Conflict Minerals

Neeltran is committed to complying with regulatory and customer requirements regarding the prohibition and restriction of substances, including hazardous substances and conflict materials. As such Suppliers shall ensure that the goods provided to Neeltran are in compliance with requirements covered under the scope of all relevant regulations. Specifically, Suppliers will do the following: 1. Declare to Neeltran substances which are listed on the Neeltran list of prohibited and restricted substances and contained in the goods you supply to Neeltran, Inc.; 2. Implement a policy regarding conflict minerals and exercise due diligence to investigate the source of those materials; and 3. Respond in a timely manner to Neeltran's requests for evidence of your compliance with these requirements.

Inspections and Corrective Actions

For purposes of demonstrating and ensuring compliance with Neeltran's Supplier Code of Conduct, Supplier shall keep record of all relevant documentation and provide Neeltran, Inc. with supporting documentation, as requested. To ensure compliance, Neeltran reserves the right to inspect and audit your operations and facilities, at our own cost and with reasonable notice, with or without support of a third party. In the event that the results from same Supplier audit or inspection cause us to believe the Supplier does not comply with the Neeltran Supplier Code of Conduct, Supplier will take necessary corrective actions in a time and effective manner, as directed by Neeltran. If Supplier fails to comply with this Neeltran Supplier Code of Conduct, then we may act against said Supplier, including but not limited to amending, suspending or terminating Supplier activities as one of our Suppliers.



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Access to Remedy

During our business relationship, if Supplier or Supplier's employees believe that the terms of this Neeltran Supplier Code of Conduct are not adhered to or that Neeltran is not acting in accordance with its own Supplier Code of Conduct, then we encourage Supplier to communicate concerns to the appropriate Neeltran authority.

Neeltran, Inc. reserves the right to amend or modify this Code of Conduct. Neeltran may terminate its relationship with any Supplier found to be in violation of these standards or for any other reason consistent with Neeltran's agreement with such Supplier.

We appreciate your commitment and support to Neeltran Inc's. Supplier Code of Conduct and look forward to continuing a productive and successful business partnership with your organization.

Sincerely,

A handwritten signature in black ink that reads "Antonio Capanna Jr." with a stylized flourish at the end.

Antonio Capanna, Jr
Pres/COO