



## Senneca Holdings - Supplier Code of Conduct

**Introduction:** Senneca is committed to doing business in an ethical manner and with respect for our people and the communities in which they live. We believe that this commitment will benefit our customers and other stakeholders affected by Senneca's activities. For many reasons, it is, quite simply, the right thing to do. We recognize, however, that Senneca is but one link in a supply chain to the end user that is long and global. Therefore, it is essential that our suppliers also understand and appreciate the standards of business conduct that are expected of any company that does business with Senneca.

This Guide identifies our expectations concerning business conduct that are essential for companies that do business with Senneca. We also believe that these Standards will serve to advance the performance of our companies to our mutual benefit. Therefore, compliance with Senneca's Supplier Code of Conduct is a mandatory component of all Senneca purchase contracts.

We appreciate your thorough review of the standards set forth in this Guide.

**Respect for People:** We expect every Senneca supplier to abide by all applicable employment laws. We believe every person should determine for his or herself whether employment is in his or her best interests. We believe that children should not be placed in a position of making this determination. Therefore, Senneca will not allow the use of labor by children under the age of sixteen unless as part of a government authorized job training or apprenticeship program that would clearly be beneficial to the individuals participating. We expect that our suppliers will not use of any forced or involuntary labor in any form, including human trafficking or physically abusive disciplinary practices.

Senneca also expects its suppliers to provide employee wage and benefit levels that satisfy basic needs in light of local conditions. We also expect suppliers to abide by all applicable laws related to limits on regular and overtime working hours and compensation. And, we expect our suppliers to respect freedom of association of its employees in accordance with local laws.

**Safe and Positive Workplace:** We believe that a diverse workforce fosters creativity and enthusiasm. We expect our suppliers to encourage a positive and diverse workplace by not tolerating harassment or discrimination, including that involving race, color, religion, sex, sexual orientation, gender, gender identity, national origin, protected veteran status, age or disability.

Senneca also expects its suppliers to provide its employees with a safe and healthy work environment and to abide by all applicable health and safety laws.

**Environmental Protection and Product Content:** We expect that our suppliers will abide by all local environmental laws and regulations. In addition, we believe that Senneca suppliers should work to minimize waste, prevent pollution, and conserve energy. We also encourage our suppliers to seek external verification concerning their environmental performance, such as through the ISO 14001 certification process. Senneca suppliers are expected to use materials that conform to all legal and regulatory requirements and which also satisfy Senneca's product content rules identified in our Supplier Quality Manual.

Senneca is also committed to adherence with "Registration, Evaluation, Authorization, & Restriction of Chemicals" ("REACH") requirements. Senneca suppliers are expected to cooperate fully with Senneca to satisfy these and other recycling and environmental and health protection initiatives.

**Conflict Minerals and Other Product Origin Obligations:** Senneca is committed to compliance with U.S. laws related to use of "conflict minerals". As a Senneca supplier, you are expected to respond to all requests for information related to product content and origin.

**Product Safety:** When requested, you are expected to provide information related to product content and about country of origin. Senneca suppliers are expected to take all reasonable safety measures in connection with the design and manufacture of products it sells to Senneca. It is the obligation of every Senneca supplier to inform Senneca immediately if a question concerning safety of a product sold to Senneca arises.

**Supply Chain Transparency:** Supply chain transparency is required to confirm compliance to this code of conduct. To monitor this, Senneca will request documentation, conduct onsite audits, review and approve corrective action plans, and verify implementation of corrective action.

**Communication:** Suppliers are expected to assist Senneca in enforcing this Supplier Code of Conduct Guide by communicating its principles to their supervisors, employees, and suppliers.

**Gifts, Favors and Entertainment:** Senneca will select its suppliers based on total value, including quality, price and services offered. Therefore, suppliers should not give gifts, favors or entertainment to Senneca people or that is inappropriate or unbecoming to Senneca employees. Senneca employees are required to adhere to a corporate policy governing gifts and entertainment. You must not try to unfairly influence a Senneca employee through inappropriate gratuities. Ask your Senneca contract representative if any potential gift or entertainment is allowable under Senneca's policies. And, if a Senneca person solicits you for a gift or a favor, you should report that matter to Senneca HR.

**Improper Payments:** It is Senneca policy that bribes, kickbacks, or other improper payments may not be offered or paid directly by or on behalf of Senneca anywhere in the world to any officer, agent or employee of any customer, supplier, or competitor, or to a third party if you know or have reason to suspect that any part of the payment will be given or offered as a part of an improper payment. This includes, but is not limited to, payments to government officials. If you are acting on Senneca's behalf in any manner, you must comply with this policy. If you are performing services for Senneca, you may be required to certify and provide evidence of your understanding and compliance with this policy.

**Negotiating Fairly and Honestly:** Information which you give to Senneca during the course of negotiations or otherwise must be accurate. You must not attempt to improperly influence the course of negotiations through any deceptive means. You must abide by all laws and regulations that may affect our business together, including laws related to fair competition and trade practices.

**Good Ethics is Good Business:** As we do business together, we believe that adherence to the above principles will serve both of our companies well. If you have any questions concerning whether conduct related to your supply of goods or services to Senneca is appropriate, we invite you bring that matter to the attention of your business contact at Senneca. He or she will provide assistance or will seek additional guidance as appropriate.

**Questions and Concerns:** If you have any questions or concerns related to any of the matters identified in this Guide, please contact your Senneca Purchasing representative.

**Thank you for your support.**