



SUPPLIER CODE OF CONDUCT

Penhall Company is committed to safety and business integrity. As part of that commitment, we expect that our suppliers act similarly to ensure that working conditions at their operating locations are safe, that workers are treated with respect and dignity, and that suppliers enact measures to protect the environment. Penhall Company has implemented this Supplier Code of Conduct to define the basic requirements placed on our suppliers of goods and services concerning their responsibilities towards their employees, stakeholders and the environment.

We expect our suppliers and business partners to communicate these expectations throughout their supply chain by adopting efficient management systems, policies, procedures and training to uphold the standards and expectations set forth in this Supplier Code within their own business operations.

By its acceptance of any purchase order from Penhall Company, our suppliers acknowledge that they are committed to comply with the Supplier Code of Conduct and represent that they:

- comply with the laws of the local, state and federal jurisdictions in which they operate;
- develop, implement and maintain methods and processes appropriate to their products and services to minimize the risk of introducing counterfeit parts and materials into deliverable products;
- maintain books and records in accordance with applicable law and Generally Accepted Accounting Principles (GAAP);
- respect the personal dignity, privacy and human rights of each individual, including, without limitation, by not using forced or involuntary labor and creating equal opportunities for and treatment of its employees irrespective of skin color, nationality, race, disabilities, political or religious conviction, sexual orientation, age, sex or social background;
- ensuring the right to reasonable compensation, at or above the applicable minimum wage and ensuring that employees do not work an unreasonable number of working hours;
- make hiring and employment decisions, including those relating to compensation, benefits, promotion, training and development, discipline, and termination are based solely on the worker's skill, ability, experience and performance;
- provide for the health and safety of its employees, including continuous training and implementation of health and safety processes;
- do not tolerate corruption, extortion and bribery of any governmental official;
- do not offer or accept any gift, loan, fee, reward or other advantage to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust; and
- minimize environmental pollution and make continuous improvements in environmental protection, including avoiding and reducing all forms of waste.