



PACBRAKE COMPANY SUPPLIER CODE OF ETHICS

OVERVIEW

As a condition to doing business with Pacbrake Company, we require that all suppliers and their employees commit to this code of ethics. This applies to all businesses that provide products or services to Pacbrake Company.

Pacbrake Company suppliers must comply with the law, rules, regulations, and Pacbrake policies of the countries and locations in which they operate. They are expected to be familiar with the business practices of their suppliers and subcontractors, and ensure they operate according to this code of ethics.

We expect Suppliers to operate in accordance with values comparable to ours and in a manner which is consistent with prudent business practices.

Pacbrake Company may discontinue its relationship with suppliers who fail to comply with this code.

BUSINESS INTEGRITY

Compliance with Laws

In all their activities, Suppliers must ensure they conduct business in compliance with the applicable laws, rules and regulations of the jurisdictions in which they operate.

Conflicts of Interest

In their relationship with our employees, Suppliers must not try to gain improper advantage or preferential treatment for other relationships they may have with us (for example, another customer)

Gifts and Entertainment

Suppliers must not offer gifts to Pacbrake employees. This includes gifts of nominal value. Although giving gifts is acceptable in some cultures, Pacbrake requests that suppliers respect its policy of not accepting gifts.

Anti-Bribery and Anti-Corruption

Bribes, kickbacks, and similar payments are strictly prohibited. This ban applies even when local laws may permit such activity. Employees, suppliers and agents acting on behalf of Pacbrake are strictly prohibited from accepting such considerations under any circumstances.

CONFIDENTIAL INFORMATION

Proper management of confidential information is critical to the success of both Pacbrake and Suppliers. Suppliers must protect all Pacbrake information, electronic data, and intellectual property. Any transfer of confidential information must be executed in a way that secures and protects the intellectual property rights of Pacbrake and its Suppliers. Our Suppliers can expect Pacbrake to similarly safeguard their confidential information when authorization is provided to Pacbrake.



OUTSOURCING AND SUBCONTRACTING

We recognize that outsourcing is a practice that Suppliers may use to promote innovation, fill resource gaps, and –or create operational efficiencies. We also recognize that suppliers may need to use subcontractors in the performance of services. However, we expect Suppliers not to subcontract services they perform for us or outsource activities that directly impact the delivery of goods and services to us, without our prior written approval. In situations where approval is given, it is important for us to know the locations of where the work will be performed and the parties involved in the provision of the services.

In addition, Suppliers must monitor the outsourcing or subcontracting arrangement to ensure it complies with the Suppliers contractual obligations and with this Code, and provide evidence of such monitoring upon request.

SUPPLIER MANAGEMENT SYSTEM

Suppliers are expected to have a management system that ensures they comply with applicable laws, regulations, and Pacbrake policies. Suppliers are to conform to this Supplier Code of Ethics, and identify and reduce operational risks related to this code. The system should also promote continuous improvement and compliance with changing laws and regulations. An environmental management system is strongly recommended for environmental compliance.

RESPONSIBLE TREATMENT OF INDIVIDUALS

Respect and Diversity

Suppliers must maintain workplaces characterized by professionalism, and respect for the dignity of every individual with whom their employees interact. Suppliers must respect the diversity of their employees, clients and others with whom they interact, including respect for differences such as gender, race, colour, age, disability, sexual orientation, ethnic origin and religion. Suppliers must not tolerate harassment, discrimination, violence, retaliation and other disrespectful and inappropriate behaviour.

Suppliers must respect the dignity of their own employees and others, adhere to principles of diversity and maintain a respectful workplace.

Employment Practices

Suppliers must abide by applicable employment standards, labour, non-discrimination and human rights legislation. Where laws do not prohibit discrimination, or where they allow for differential treatment, we expect suppliers to be committed to non-discrimination principles and not to operate in a way that differentiates unfairly.

Suppliers must be able to demonstrate that, in their workplaces:

- Child labour is not used.
- Discrimination and harassment are prohibited, including discrimination or harassment based on any characteristic protected by law.
- Employees are free to raise concerns and speak up without fear of reprisal.
- Appropriate and reasonable background screenings, including investigations for prior criminal activity, have been done to ensure the integrity and good character of the Suppliers employees.
- Clear and uniformly applied employment standards are used that meet or exceed legal and regulatory requirements.



HEALTH AND SAFETY

We expect suppliers to provide healthy and safe workplaces and comply with relevant health and safety laws. We expect Suppliers to provide all their employees with adequate information and instruction on health and safety concerns and to enable their employees to meet their responsibilities for the maintenance of a healthy and safe workplace.

ENVIRONMENT

We expect suppliers to work with us to promote environmental sustainability. Suppliers are to assist in reducing our environmental footprint, conduct business in an environmentally responsible way, and offer environmentally responsible products and services.