

OVERVIEW

Since 1949, Vapormatic has been a responsible and successful business that focuses on providing Genuine Value to customers, employees, investors, dealers, suppliers and the communities where we do business. As a wholly owned business of John Deere, it is guided by the core values of integrity, quality, innovation and commitment. Vapormatic's commitment to integrity and social responsibility extends to its diverse and worldwide supply base. To ensure that suppliers conduct business with a high degree of integrity and in a socially and environmentally responsible manner, all of Vapormatic's suppliers are expected to adhere to this Supplier Code of Conduct.

General Responsibility

Suppliers are expected to do what is necessary to comply with this code without delay. Suppliers are expected to be familiar with the business practices of their suppliers and sub-contractors and ensure they operate within the guidelines of this code. Failure to comply with this code may result in discontinuance of business relationships.

KEY EXPECTATIONS

Gifts and Gratuities

Vapormatic and its employees are not permitted to accept gifts from current or potential suppliers. This includes gifts of nominal value. Although giving gifts is acceptable in some cultures, Vapormatic requests that suppliers respect its policy of not accepting gifts.

Improper Payments

Vapormatic conducts business with high integrity and within the bounds of the law. Bribery and kickbacks are illegal and subject to criminal penalties in many countries, including the United Kingdom. Bribes, kickbacks and similar payments to government officials, Vapormatic employees or agents acting on Vapormatic's behalf are strictly prohibited. This prohibition also applies in areas where such activity may not violate local law.

Child Labour

Vapormatic will not engage in or support the use of child labour. Suppliers are expected to comply with applicable local child labour laws and employ only workers who meet the applicable minimum legal age requirement for their location. In the absence of local law, suppliers shall not employ children under the age of 14.

Forced Labour

Vapormatic will not engage in or support the use of forced or involuntary labour. Vapormatic will not purchase material or services from a supplier utilising forced or involuntary labour.

Compensation and Working Hours

Vapormatic pays employees a competitive wage. Suppliers are expected to comply with all applicable wage and hour labour laws and regulations governing employee compensation and working hours.

Discrimination

Vapormatic supports diversity and equal opportunity in employment. Unlawful discrimination in the workplace is not tolerated. Suppliers are expected to comply with all applicable local laws concerning discrimination in hiring and employment practices.

Environment

Vapormatic respects the environment and conducts its operations in compliance with applicable laws and regulations. Suppliers are expected to conduct their operations in a way that protects the environment. Suppliers are expected to comply with all applicable environmental laws and regulations in the countries in which they operate.

Health and Safety

Vapormatic is committed to the safety and health of its employees and conducts its operations in compliance with applicable laws and regulations. Suppliers are expected to provide a safe working environment that supports accident prevention and minimizes exposure to health risks. Suppliers are expected to comply with all applicable safety and health laws and regulations in the countries in which they operate.

Confidential Information

Vapormatic is dedicated to complying with applicable laws concerning proprietary, confidential and personal information. Suppliers are expected to comply with all applicable laws and regulations governing the protection, use and disclosure of Vapormatic intellectual property, proprietary, confidential and personal information.

CONTACT INFORMATION

For questions or comments on the Vapormatic Supplier Code of Conduct, please contact Ian Mitchell, Manager, Supply Chain, Global Operations.

NON-COMPLIANCE REPORTING

Violations of the Vapormatic Supplier Code of Conduct should be reported using one of the following confidential options:

Telephone: +44 (0)1392 684081

Post: Compliance Desk
PO Box 58
Kestrel Way
Sowton Industrial Estate
Exeter
EX2 7NB
England

ONLINE VERSION

The Vapormatic Supplier Code of Conduct is available online at:

<http://www.vapormatic.com/suppliercode>

Please refer to the website for changes to the Vapormatic Supplier Code of Conduct.