

Supplier and Subcontractor Conduct Guide

Table of Contents:

Compliance with Laws and Regulations
Equal Opportunity
Ethics
Human Trafficking
Safety
Sustainability

Hilldrup is committed to providing an ethical, safe and healthful workplace. Hilldrup is compliant with local, national, and international laws and regulations, provides an equal opportunity atmosphere, and promotes environmental protection. Hilldrup will only work with suppliers and subcontractors that mandate the same commitment in their own organizations.

Compliance with Laws and Regulations:

Our suppliers and subcontractors must be acutely aware of and follow all applicable laws and regulations at all times in the performance of their work.

Equal Opportunity:

It is Hilldrup's intent not only to comply with all aspects of equal opportunity as defined by Title VII of the Civil Rights Act of 1964, as amended, but also to aggressively promote an atmosphere within the company that assures all persons the opportunity to succeed on their own merit without regard to race, color, religion, sex, sexual orientation, age, disability, marital status, citizenship, or any other characteristic protected by law. We seek, in all of our operations, to employ individuals for available positions who are qualified or qualifiable on the basis of merit and ability alone. Hilldrup expects that all suppliers and subcontractors will comply with the same employment practices.

Ethics:

Hilldrup is committed to conducting business in an ethical and honest manner and seeks to do business only with suppliers and subcontractors who share these values. Hilldrup is also dedicated to compliance with applicable laws and regulations and to maintain the highest standards of ethical and honest conduct in everything the company does.

Human Trafficking:

Hilldrup is committed to respecting human rights where we operate. Hilldrup has zero tolerance for human trafficking and any evidence of this occurring will result in the immediate termination and removal of that agent from any agreement with Hilldrup and from our Global Partner Network. Hilldrup will also immediately report the violation to the appropriate authorities in that agent's region.

We expect our suppliers and subcontractors to obey the laws that require them to treat workers fairly and provide a safe and healthful workplace.

Safety:

Hilldrup makes safety a core value in its business operations. Hilldrup maintains an effective safety compliance program that meets applicable laws and regulations. We operate facilities in a safe manner with our customers and employees at the forefront. Hilldrup expects our suppliers and subcontractors to operate safely and provide an environment for their employees and customers that promotes this value.

Sustainability:

Hilldrup is committed to providing a safe and healthful work place, to protecting the environment, and to conserving energy and natural resources. The objectives of our policy are as follows:

- To provide a safe and healthful workplace and to ensure that personnel have appropriate safety and emergency equipment.
- To be environmentally responsible and to use processes that do not adversely affect the environment while seeking to improve operations minimizing waste, and to prevent air, water and other pollution.
- To conserve natural resources by reducing, reusing and recycling materials and supplies.
- To ensure the responsible use of energy in all operations.
- To meet all applicable federal, state and local governmental environmental regulations.

Every Hilldrup employee is expected to adhere to this policy and to immediately report any environmental or health concerns to Hilldrup management. Managers are expected to take prompt and meaningful corrective and preventive actions. We expect our suppliers and subcontractors to promote healthful workplaces and strive to protect the environment in their local communities.