



Universal Fibers, Inc.

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Universal Fibers® is an ISO 14001 and ISO 9001 certified company

CODE OF CONDUCT INTRODUCTION

At Universal Fibers, we are people. We are one community – local, regional, and global. We know that the whole is greater than the sum of its parts. We have a purpose that extends far beyond what we create.

We are guided by sustainability, resource conservation, safety, and security. We generate economic, social and environmental conditions that allow people and communities to thrive.

We innovate and position ourselves to serve all our stakeholders' needs well into the future. We work and live within the synergy of safety, innovation and quality.

This ethic influences everything we do – from the products we deliver; to the partners with whom we align; to the investments we make; to the communities we support; to the opportunities we explore.

We strive for continuous improvement leading to measurable annual results and a purposeful, successful, and positive impact on our global community.

Thank you for investing time in learning who we are and how we can best serve you.

Phil Harmon

President

Universal Fibers, Inc.

Universal Fibers Inc. believes in doing business with those suppliers, manufacturers, contractors, joint venture partners, agents, distributors, and consultants (referred to in these guidelines as "suppliers") who embrace and demonstrate high standards of ethical business behavior.

Universal Fibers has a fundamental responsibility to ensure that customers can trust the safety and quality of our products.

The following Standards have been established to define Universal Fibers' minimum requirements of its suppliers.

Suppliers will provide services and/or products that meet or exceed all government and all agreed upon quality and safety standards. Any threats to product safety must be immediately reported to your Universal Fibers supply chain contact.

OUR VALUES

The Mirror Test

- Do the Right Thing!
- Is it Right? How does your conscience feel? What would a trusted friend say?
- What will others Think? If you were explaining your actions to others? to Universal Fibers?
- Is it Legal? If it's not legal, don't do it.

PRINCIPLES OR STANDARDS

Employment Practices

Universal Fibers has a fundamental commitment to treating employees fairly, and with dignity and respect. We believe in doing business with suppliers who share this commitment. We hold ourselves to the Standards below and we require suppliers to comply with applicable employment laws and to support fundamental human rights for all people.

Child Labor

Suppliers will not employ individuals in violation of the local mandatory school age, or under the legal employment age in each country where they operate. Moreover, in no case will suppliers employ non-family workers under age 15, except for child actors and models employed in advertising or media who are protected by applicable child labor requirements.

Compensation

Suppliers will pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. In addition to their compensation for regular hours of work, workers will be compensated for overtime hours at no less than the rate required by applicable laws and regulations.

Discrimination

Suppliers will not discriminate based on personal characteristics or beliefs.

Forced Labor

Suppliers will not use forced or involuntary labor whether bonded, prison, or indentured, including debt bondage.

Freedom of Association

Suppliers will develop and implement an occupational health and safety management system that insures compliance with all health and safety requirements putting worker's safety foremost and focuses on continual improvement. Universal Fibers believes free association, open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. We encourage our Associates to express their concerns openly without fear of reprisal, intimidation or harassment, and invite our partnered suppliers to share in this commitment.

Safety and Health

Suppliers will develop and implement an occupational health and safety management system that insures compliance with all health and safety requirements putting worker's safety foremost and focuses on continual improvement.

Workplace Harassment or Abuse

Suppliers will not subject employees to a hostile environment which can include physical, verbal, sexual, or psychological harassment, nor use corporal or physical punishment to discipline employees.

Working Hours

Suppliers will comply with all applicable laws and regulations regarding working hours. Workers will regularly be allowed at least one day off per seven-day week.

Anti-Corruption

Universal Fibers strictly abides by all local laws and applicable U.S. laws, including Foreign Corrupt Practices Act, and requires suppliers to act in a similar manner.

Specifically, suppliers will not pay bribes or engage in corrupt practices in order to advance Universal Fibers' business interests. This includes, directly or indirectly, offering, promising to pay or authorizing the payment of money or anything of value to local government officials, political parties or candidates for political office for the purpose of influencing the acts or decisions of local officials.

Environment

Universal Fibers believes in doing business with suppliers who share the company's commitment to protecting the quality of the environment around the world through sound environmental management.

Suppliers will comply with all applicable environmental laws and regulations, and will promptly develop and implement plans or programs to correct any non-compliant practices.

Universal Fibers will actively seek suppliers who seek to reduce waste and minimize the environmental impact of their operations.

With regards to Conflict Minerals, suppliers are expected to supply materials to Universal Fibers that are "DRC conflict-free." "DRC conflict-free" means (1) any "conflict minerals" (gold, columbite-tantalite, also known as coltan, cassiterite, wolframite, or their derivatives tin, tantalum or tungsten (collectively the "3TGs")) necessary to the functionality or production of supplied materials do not directly or indirectly finance armed groups through mining or mineral trading in the Democratic Republic of Congo or an adjoining country, or (2) any 3TGs in supplied materials are from recycled or scrap sources. (3) Suppliers are expected to adapt policies and management systems with respect to conflict minerals and to regulate their suppliers to adapt similar policies and systems.

IMPLEMENTING AND MONITORING THE CODE OF CONDUCT

Communication

Suppliers will take appropriate steps to ensure that these Standards are communicated to their employees and their own supply chain. Suppliers will train their employees regularly to ensure that all employees understand and are familiar with these Standards. Suppliers will encourage and educate their own suppliers to adhere to these Standards.

Monitoring and Compliance

Suppliers will notify Universal Fibers immediately if they become aware of any non-compliance of their company or of any of their suppliers with these Standards, and suppliers will take immediate actions necessary to remedy any non-compliance. Universal Fibers may engage in various monitoring activities to confirm compliance with these Standards, including but not limited to conducting its own or independent third-party site inspections and audits of suppliers.

Our expectation

For all suppliers to Universal Fibers, our expectation is simple: live up to these Standards and do the right thing. Universal Fibers employees around the world use the Mirror Test as their fundamental guide. We encourage suppliers to use our Mirror Test as well.

Failure to observe and abide by these Standards may result in Universal Fibers ceasing to do business with such supplier.