

Tredegear Corporation Vendor Code of Conduct

This policy is subject to update from time to time.

Tredegear is committed to ethical and lawful behavior, and to acting professionally and fairly in all business dealings and relationships. Vendors' activities may influence Tredegear's reputation and relationship of trust with our clients and employees, and as such we expect our vendors to maintain the same high legal and ethical standards.

We expect integrity – of our employees, our directors and our vendors – in all we do. We have a Code of Conduct (www.tredegear.com/conduct) for our employees and directors that describe the policies, procedures and principles that they must follow. Likewise, this Vendor Code of Conduct (“Vendor Code”) incorporates the principles of lawful and ethical conduct that Tredegear expects of its vendors (each, a “vendor” and collectively, “vendors”). Tredegear expects each of its vendors to have their own appropriate code of conduct.

Tredegear expects its vendors, as well as those in its supply chain, to comply with the letter and spirit of all applicable laws, rules and regulations in the countries in which they operate, as well as the principles set out below:

Ethical Behavior:

Business and Financial Records - We expect vendors to provide honest and accurate invoices.

Anti-Corruption – In compliance with the Foreign Corrupt Practices Act (“FCPA”) and other similar laws, we will not tolerate bribery and corruption, and we require our vendors to take the same approach. A vendor may not (1) offer or allow anything of value to be given on behalf of Tredegear in order to gain an improper advantage, (2) offer or allow anything of value to be given to a Tredegear employee in order to gain an improper advantage, or (3) ask for or accept anything of value which the vendor knows or suspects is being offered in order to obtain an improper advantage.

Antitrust/Fair Business Practices - Vendors must comply with antitrust laws – known globally as “competition laws,” and refrain from price-fixing, monopolistic and other illegal anti-competitive behavior.

Gifts and Entertainment - All purchases made by Tredegear will be made on the basis of price, quality and service, and Tredegear will deal with its vendors fairly, honestly and openly. Tredegear employees are required to conduct all business and interactions with vendors in strict compliance with the applicable provisions of Tredegear's Code of Conduct. Furthermore, vendors should not offer, and Tredegear employees must not accept, gifts or entertainment that might compromise, or appear to compromise, an employee's judgment or independence.

Confidential Information, Privacy and Data Security – Where applicable, vendors must sign and abide by Tredegear's confidentiality disclosure agreements, which protect the proprietary information of Tredegear, its employees, and potentially other partners. Where vendors handle personally identifiable information on behalf of Tredegear, belonging to Tredegear or its clients, then the vendor must contractually commit to apply privacy and information security safeguards.

Labor:

Vendors shall (and shall ensure that each of their subcontractors shall) comply with all applicable human rights laws, statutes, regulations and codes. Tredegar expects its vendors to treat their workers with dignity and respect, and to uphold their human rights. Vendors will comply with local applicable laws regarding wages, overtime hours and mandated benefits, and will provide a workplace free from sexual harassment and illegal discrimination. No vendor will use illegal child labor, or engage in any form of forced labor, human trafficking or slavery. We expect our vendors to evaluate the level of risk of a particular good or service, and develop appropriate checks, processes and accountability standards to manage such risks internally and in its supply chain.

Health, Safety and Respect for Environment:

Tredegar expects vendors to provide a healthy and safe working environment and to comply with applicable environmental, health and safety laws and regulations. Additionally, Tredegar expects vendors to source materials from sources that do not directly or indirectly benefit armed groups that are committing human rights abuses. To the extent any vendor supplies or manufactures components, parts or products containing “conflict minerals,” vendors are expected to comply with Tredegar’s Conflict Mineral Policy found at www.tredegar.com/commitments

Processes, Emergency Preparedness and Response – In order to protect their workers and the environment, vendors shall have in place emergency plans in the case of an unsafe event and response procedures should such an event occur.

Supplier Audits:

Depending on the level of risk associated with a particular good or service, the Company has audit rights in its supplier contracts that generally address legal compliance issues. In addition, depending on the nature of the service or good and whether the Company suspects that a supplier is violating the law, the Company may elect to visit supplier sites to investigate and assess product and contractual compliance issues and to take appropriate action depending on the results of our investigation, including elimination of the supplier from our supply chain. Otherwise, the Company does not routinely conduct audits of suppliers to evaluate supplier compliance with any policies.

IntegrityLine:

Vendors can report any suspected compliance or ethics violations by contacting the Tredegar IntegrityLine. All Access Dialing Numbers for the IntegrityLine are:

USA: 1-888-475-8271

Brazil*: 0800-892-0643

Hungary*: 06-800-20804

Netherlands: 0800-022-9111, 888-475-8271

China*: 400-881-1463

India: 000-117, 888-475-8271

*Local language selection is available.