

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. In addition, Tredegear requires its vendors to understand this Code of Conduct and to take all necessary steps to act in accordance with 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 and labor rights as outlined in the International Labour Organization's (ILO) standards. Vendors will comply with local applicable laws regarding wages, overtime hours and mandated benefits and will provide a workplace free from illegal discrimination, harassment and retaliation, including sexual harassment. No vendor will use illegal child labor, or engage in any form of forced labor, corporal punishment, mental or physical coercion, 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. Vendors shall respect the right of workers to join and organize associations of their own choosing and to bargain collectively without fear of reprisal. Vendors are also expected to observe other labor rights as expressed in Tredegar's Code of Conduct (tredegar.com/conduct).

Health, Safety and Respect for Environment:

Tredegar expects vendors to provide a safe and healthy working environment, to comply with applicable environmental, health and safety laws and regulations, and to implement procedures that integrate safety and health objectives into their business planning, decision making, performance tracking and review processes. All vendors visiting Tredegar premises are expected to comply with the Company's internal Safety and Health Policy found at www.tredegar.com/commitments.

Additionally, Tredegar expects vendors to take necessary precautions and comply with local, federal and international environmental and other laws to regulate air emissions, solid and wastewater disposal, and proper use and disposal of hazardous substances. Vendors should 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.

Vendor Screening and Audits:

Depending on the level of risk associated with a particular good or service, the Company screens vendors as part of due diligence of third parties in an effort to ensure its vendors comply with health, safety, environmental, labor, antitrust, anti-corruption, human rights, and other applicable laws and regulations. Furthermore, depending on risk levels, the Company has audit rights in its vendor 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 vendor is violating the law, the Company may elect to visit vendor 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 vendor from our supply chain. Otherwise, the Company does not routinely conduct audits of vendors to evaluate their 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

China*: 400-881-1463

*Local language selection is available.