

Deublin Company

Code of Business Conduct

Policy Statement

Deublin Company, its segments, operating companies, controlled affiliates and subsidiaries worldwide (collectively, “**Deublin**”) understand that our success depends on our reputation for ethical business performance and performing our jobs honestly, diligently and with integrity, in compliance with all applicable laws and regulations. Consistent with our commitment to conduct business fairly and honestly, this Code of Business Conduct (this “**Code**”) establishes the standards for Deublin and its employees in conducting Deublin’s business.

Compliance with Laws and Regulations

Deublin companies do business throughout the world. Because of Deublin’s global presence, it will comply with all laws and regulations applicable to its business in the countries where it does business, including all laws and regulations relating to each subject matter below. Deublin’s obligations and requirements extend to all countries where Deublin does business.

Child Labor and Forced Labor

Deublin will comply with all applicable local laws with respect to child labor and will prohibit and refrain from any kind of child labor within Deublin. Deublin will not use forced, bonded, involuntary, prison or indentured labor.

Wages and Working Hours

Deublin will comply with all applicable local laws with respect to wage and hour laws, including those relating to minimum wages, overtime hours, and other elements of compensation, and will provide all legally mandated benefits. Deublin will not require employees to work more than the maximum number of hours permitted under applicable laws.

Freedom of Association

Deublin will respect workers’ rights to associate freely, in compliance with existing local laws and without intimidation, reprisal or harassment.

Discrimination

Deublin will promote equal opportunities and equal treatment and will not discriminate against any worker in its hiring and employment practices based on race, color, religion, disability, national origin, gender, sexual orientation, marital status, age or other characteristic protected by local law. Deublin will not discriminate against any worker based on political affiliation or union membership in its hiring and employment practices. Deublin will not require a pregnancy test prior to employment or otherwise require workers or potential workers to undergo medical tests that could be used in a discriminatory way, except where required by applicable laws, or where prudent for workplace safety.



Fair Treatment

Deublin will treat its workers with dignity and respect. Deublin will maintain a workplace free of harassment and discrimination and will not threaten workers or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse. Deublin recognizes the labor standards issued by the International Labor Organization, taking into account the applicable laws and regulations in the countries where Deublin does business.

Health and Safety

Deublin will conduct its operations in compliance with applicable health and safety laws and regulations, provide its workers with a safe and healthy work environment and will maintain an appropriate occupational, health and safety management system. Where Deublin also provides accommodations for its workers, such accommodations shall be appropriate for its location and be clean, safe and, at a minimum, meet the basic needs of its workers.

Environment

Deublin will comply with all applicable environmental laws, regulations and standards to minimize any adverse impact on the environment and will maintain a suitable environmental management system. Deublin will endeavor to conserve natural resources and energy, and reduce or eliminate waste and the use of hazardous substances.

Fair Dealing and Competition Laws

Deublin will not engage in collusive bidding, price fixing, price discrimination or other unfair trade practices in violation of applicable antitrust or competition laws. Deublin will uphold fair business standards in advertising, sales and competition.

Protection of Intellectual Property

Deublin will respect intellectual property rights, including patents, trademarks, copyrights and process designs, and safeguard Deublin's confidential and proprietary information. Any transfer or sharing of technology or know-how must be done in a manner that protects intellectual property rights and is in compliance with local laws.

Data Privacy and Security

Deublin will comply with all local laws concerning data security and privacy, and will protect and safeguard data provided to Deublin, which may include private and sensitive personal information. Any transfer or sharing of data must be done in a manner that protects such information from inadvertent or unauthorized disclosure and any disclosure must be in compliance with local laws.



Improper Payments

Deublin will not engage in any corruption, extortion or embezzlement, in any form. Deublin will comply with all applicable anti-corruption laws and regulations of the countries in which they operate, the U.S. Foreign Corrupt Practices Act, the UK Anti-Bribery Act, the OECD Anti-Bribery Convention and all United Nations (UN) and Organization for Economic Co-Operation and Development (OECD) anti-corruption conventions. Deublin will not offer, promise, grant or accept bribes or employ other means to obtain an undue or improper advantage. Bribes, kickbacks, facilitating payments and similar payments to government officials or to Deublin employees or agents acting on Deublin's behalf are prohibited. Deublin employees are discouraged from accepting gifts or entertainment from suppliers. When business meals are appropriate to further business relationships, those meals may not be extravagant in nature.

Deublin will not present any invitations or gifts to gain any form of influence which are not reasonable and suitable (reflecting ordinary local business customs) and will not seek or request inappropriate advantages.

Export Control

Deublin will comply with all applicable laws and regulations for import and export and will process and document its imports and exports so that the same may be traced.

Money Laundering

Deublin will comply with all applicable money laundering laws for all transactions and other services arising from business relationships.

Conflicts of Interest

Deublin will seek to identify and prevent any conflicts of interest and not base its decisions on any private or personal interests or other conflicts of interest.

Supplier Codes of Conduct

Deublin may require any supplier, sub-supplier, contractor or subcontractor to Deublin to adopt or otherwise demonstrate to Deublin or Deublin's customers that such supplier, sub-supplier, contractor or subcontractor has adopted a code of conduct reflecting standards for such supplier, sub-supplier, contractor or subcontractor in conducting its business which are substantially similar to (and, in any event, no less stringent than) the standards reflected in this Code.

Monitoring and Record Keeping

Deublin will maintain all documentation necessary to demonstrate its compliance with this Code and any codes of conduct provided to Deublin in writing by a customer of Deublin.



Enforcement and Reporting

Failure to adhere to this Code by any employee of Deublin or any supplier, sub-supplier, contractor or subcontractor to Deublin may result in corrective action up to and including termination of employment of any such employee or termination of Deublin's business relationship with any such supplier, sub-supplier, contractor or subcontractor. This Code does not limit Deublin's right to impose discipline or other corrective action for other conduct detrimental to the interests of Deublin, its principals, or its employees or customers.

For any questions or concerns about interpreting or applying this Code, or anything related to any Deublin policy, procedure or standard, contact your supervisor, another supervisor, or the Manager of Human Resources.

Anyone who becomes aware of a violation, or potential violation, of this Code or any related policy, procedure or standard, must notify the Manager of Human Resources. Deublin generally will keep such reports or concerns confidential to the extent possible while still allowing Deublin to investigate and take appropriate action. Deublin will not tolerate retaliation against anyone who makes a good faith report regarding a violation or potential violation of this Code.

Amendments

This Code may be amended from time to time if such amendment is approved by any two of Deublin's Chief Executive Officer, President or Chief Financial Officer; provided that such amendment shall be subject to subsequent review and approval by the Board of Directors of Deublin no less frequently than annually.

As adopted by the Board of Directors on September 26, 2016

