

Doing Business with Enerquip

Enerquip, LLC is committed to conducting all of our business activities in accordance with the highest legal and ethical standards.

Enerquip strives to conduct business only with third parties who share our commitments to compliance with legal requirements and to high ethical standards. Enerquip expects the third parties who produce products for or provide services to Enerquip to conduct business responsibly, with integrity, honesty and transparency.

Enerquip developed *Doing Business with Enerquip* as a Third Party Code of Conduct to ensure that you are aware of Enerquip's expectations when working with our employees and for your own business conduct.

Feel free to contact Enerquip for additional documents regarding Enerquip's positions on various issues of social responsibility.

We ask that you integrate, communicate and apply the principle found in *Doing Business with Enerquip*.

Though the vast majority of Enerquip employees and the third parties with whom we do business embrace our ethical standards, there may be a few isolated employees who attempt to violate our Code of Business Conduct or third parties who fail to meet the expectations identified in *Doing Business with Enerquip*. Even if you don't have all the facts, we will look into the issue and attempt to verify and take appropriate action.

Since we aren't always in a position to identify these deviations, we need your help to do so. If you feel someone at Enerquip or a third party doing business or seeking to do business with Enerquip is engaged in illegal, unethical or conduct that otherwise fails to meet the *Doing Business with Enerquip* expectations, we ask that you contact Enerquip's Office. The methods to report are described under **Reporting Concerns** section of this brochure.

Reporting Concerns

Enerquip encourages its suppliers, vendors, contractors, agents, distributors, customers and other third parties to seek guidance regarding Enerquip's policies when needed and to raise concerns regarding activities that may involve illegal activity, violations of policy or unethical conduct, including violations of Enerquip's Code of Business Conduct for Enerquip employees this Third Party Code of Conduct.

Concerns may be reported directly to Enerquip's Office

Phone: 1.715.748.5888

Email: shannascheithauer@enerquip.com

Mail: Enerquip, LLC
Attn: Controller
611 North Road
Medford, WI 54451-0467



"When Schedule Counts"



DOING BUSINESS WITH ENERQUIP

THIRD PARTY CODE OF CONDUCT

Enerquip, LLC

611 North Road Medford, WI 54451

www.enerquip.com

Working with our Employees

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Enerquip's policy is to purchase products and services based on the total value to the company independent of a third party's decision to purchase from Enerquip. Factors that Enerquip considers in making purchasing decisions include competitive pricing, quality of services and materials, timely performance, and a commitment to comply with this Third Party Code of Conduct.

In addition to the principles identified for third parties in *Doing Business with Enerquip*, Enerquip has defined expectations for its employees in its Code of Business Conduct to promote honest, legal and ethical conduct.

Enerquip expects third parties to respect the following provisions when interacting with its employees:

Conflicts of Interest

All Enerquip employees are required to be free from actual or potential conflict of interest. A conflict of interest occurs whenever a prospect of direct or indirect personal gain may influence the business judgment or actions of an Enerquip employee when conducting Enerquip business.

Gifts and Entertainment

Enerquip recognizes the legitimate business purposes of creating goodwill and sound working relationships that can be fostered by occasional business-related entertainment or exchanges of gifts, subject to the following limitations:

- Entertainment, gifts or other gratuities must have a legitimate business purpose and must not cause, or reasonably be perceived to cause, the recipient to alter normal business judgment concerning any transaction or impair the individual's loyalty to his/her employer.
- Entertainment must be legal, reasonable and proportionate, and consistent with acceptable business customs and practices. If a host is not present, entertainment is considered a gift, subject to gift limitations.
- Gifts only of a nominal value may be accepted.

- Gifts of cash or cash equivalents (including gift cards, securities, individual discounts, and vouchers) are never acceptable.
- Gifts or entertainment should not be solicited by an Enerquip employee or must not be received on a frequent or recurring basis.
- Enerquip employees actively engaged in a procurement decision-making process are generally prohibited from receiving a gift or entertainment from a bidding party.
- Limitations applicable to Enerquip employees also apply to family members and agents of the employee.

Enerquip employees are required to disclose gifts, entertainment or other gratuities received from a third party when the aggregate value exceeds the equivalent of \$150 during a calendar year.

Conduct of Providers

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Enerquip strives to do business by creating value through environmental stewardship, social responsibility, and economic growth, now and for future generations.

Third party providers of goods and services to Enerquip ("Providers") are expected to comply with the laws, rules, and regulations of the countries in which they operate as a minimum standard.

Enerquip expects all Providers to comply with internationally recognized standards in order to advance social and environmental responsibility, including the following:

Ethics

Providers must conduct their business in an ethical manner, act with integrity, and maintain accurate and timely books and records.

- Corruption, bribery, extortion, or embezzlement, in any form, is strictly prohibited. Providers must not pay or accept bribes or participate in other illegal inducements in business or government relationships.
- Providers must respect intellectual property rights; safeguard customer information; and ensure that transfer of technology and know-how is conducted in a manner that protects intellectual property rights.

Human Rights

Providers must uphold the human rights of workers and treat them with dignity and respect, including: (a) permitting freedom of association and recognizing the right to collective bargain, consistent with local laws; (b) eliminating discrimination in hiring, employment and compensation based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin or marital status; and (c) creating a workplace free of harassment or any other form of abuse, including sexual harassment or abuse.

- Prevention of Involuntary or Under Age Labor – Providers shall not engage in human trafficking or slavery or use any form of child labor or other forced, bonded, indentured or prison labor.

Health, Safety and the Environment

Providers must be committed to providing safe working conditions including: (a) providing appropriate worker protection(s) for chemical, biological, and physical hazard risks; (b) maintaining process safety programs to prevent or mitigate catastrophic events; (c) conducting risk assessments and implementing emergency preparedness plans and response procedures; and (d) providing safety and hazard information for worker education.

Provider must be committed to reducing their environmental impact by: (a) obtaining and complying with all required environmental permits, licenses, information registrations and restrictions; (b) ensuring safe handling, movement, storage, recycling, reuse and management of waste, air emissions and wastewater discharges; and (c) preventing and mitigating accidental spills and releases to the environment. Providers should endeavor to reduce or eliminate wastes of all types, including water and energy.

Management Systems

Providers should implement management systems to facilitate continual improvement and to ensure compliance with the expectations found within *Doing Business with Enerquip*.