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1.0 PURPOSE

With a reputation for being the world’s premier manufacturer of forward projecting and auxiliary LED lighting products in the off-road, marine, and other markets, Rigid Industries (“RIGID”) strives to conduct itself in a way that is true to its standing, character, and personality. Therefore, in furtherance of this purpose, it is RIGID’s desire that our customers, service providers, business partners, suppliers, distributors, vendors, and all other elements of our supply chain (“Members”) be familiar and comply with this Code of Conduct. By association with RIGID, RIGID’s products and/or RIGID’s brand, Members commit, subject to any applicable laws, to acting responsibly, abiding by the principles of this Code of Conduct, and ensuring that Member’s own suppliers and service providers do the same.

Adherence throughout the entire supply chain to the principles of this Code of Conduct is of great importance to RIGID. RIGID may use this Code of Conduct as part of its assessment procedures in the evaluation of any potential business relationship. RIGID reserves the right to end any business relationship with any Member not in adherence with these principles.

2.0 WORKING CONDITIONS

Every Member of RIGID’s supply chain shall safeguard the rights of their employees, including full- and part-time workers, temporary workers, interns, migrant workers, contractors and any other form of manpower. Such safeguards shall include, without limitation:

2.1 Free Choice of Employment. There shall be no forced labor, slave labor or any other form of comparable labor. All labor must be voluntary and employees must be free to end their labor or their employment relationship at any time.

2.2 No Child Labor. The employment of children is prohibited. Those below 15 years of age (depending on national law below 14 years of age), children of school age or those that have not yet reached the minimum age for employment in the respective country shall not be employed. Employees under 18 years of age shall not perform work that could endanger their health or safety. Where this is the case there shall be special measures put in place to protect these young persons.

2.3 Working Hours. The weekly hours of work shall not exceed the respective statutory maximum. The weekly hours of work including overtime shall in any event not exceed 60 hours. Emergencies and extraordinary circumstances constitute an exception. Employees shall be entitled to at least one day off per calendar week.

2.4 Wages and Benefits. Alongside economic circumstances, the requirements for business development and productivity, the remuneration paid to employees (employees and their family members) shall accord with all applicable national laws on remuneration, which includes



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laws on the minimum wage, overtime and statutory welfare benefits. Such remuneration shall furthermore enable the employees to participate in social cultural and political life.

2.5 Humane Treatment. Employees shall not be subjected to disproportionate stringency or treated in an inhumane manner. This includes sexual harassment, sexual abuse, physical reprimand and physical and mental abuse. It also applies to the threat of such treatment.

2.6 No Discrimination. Members of RIGID’s supply chain agree not to tolerate any unlawful harassment or discrimination within its workforce, or in selection and employment practices, such as for advancement and compensation or access to training opportunities, nor shall any Member of RIGID’s supply chain discriminate against employees on the basis of race, skin color, age, gender, sexual orientation, ethnic background, disability, pregnancy, religious or political conviction, trades union membership or family status.

2.7 Freedom of Association. In line with the relevant legislation, Members of RIGID’s supply chain grant employees the right to form and join associations and to safeguard their interests.

3.0 HEALTH AND SAFETY

Members of RIGID’s supply chain acknowledge that a safe and healthy work environment contributes to improvement in the quality of goods and services and to heightened motivation of the workforce. Therefore, to achieve a healthy and safe work environment, every Member of RIGID’s supply chain shall ensure, without limitation:

3.1 Health and Safety at the Workplace. Members shall ensure that it has organization systems, processes and/or measures in place in order to comply with national health and safety legislation. Members shall identify, assess and take measures to eliminate potential safety risks. The employees shall be informed of potential safety risks and instructed on proper, safe behavior and the corresponding safety measures to be implemented. Should such measures not afford adequate hazard management, the employees shall be provided with suitable personal protective equipment.

3.2 Emergency Preparedness. Potential emergency situations and events shall be identified and evaluated. Their impact shall be minimized by implementing emergency plans and reporting procedures.

4.0 ENVIRONMENT

Members of RIGID’s supply chain acknowledge that environmental responsibility is an integral part of product manufacture. Production processes shall be designed to prevent negative impacts on the environment and natural resources shall be conserved. As such, every Member of RIGID’s supply chain shall ensure, without limitation:

4.1 Environmental Protection. Members confirm that they have implemented systems, processes and/or measures and have obtained the necessary approvals in order to comply with



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statutory national environmental regulations. Members' employees shall be instructed on how to mitigate environmental risks.

4.2 Hazardous Substances. Chemicals and other materials, that pose a hazard to the environment if released, shall be identified and managed in such a way that ensures their safe handling, transport, storage, use and recycling or disposal.

4.3 Regarding Substances in Products. Members shall abide by all applicable national laws and regulations and customer specifications regarding the prohibition or restriction of specific substances. This includes mandatory labeling for recycling and disposal.

5.0 BUSINESS ETHICS

Members of RIGID's supply chain, and their representatives, shall uphold high ethical standards in order to fulfill their social responsibilities and be regarded as successful in the market. The following principles shall apply:

5.1 Law-Abiding Behavior. Members agree to comply with all applicable national laws and other regulations in the context of its business operations at any time.

5.2 Integrity. All business interactions shall be governed by high standards of integrity. Members shall not have any tolerance towards bribery, corruption, extortion, fraud and/or embezzlement and shall prohibit them in any and every form. All business processes must be transparent and properly reflected on Members' business records.

5.3 Prohibition of Improper Advantages. Bribes or other means of obtaining an illegal or improper advantage shall not be offered, accepted as a promise or received. Procedures shall be put in place to monitor and implement these requirements in order to ensure adequate compliance with anti-corruption laws.

5.4 Fair Competition (Antitrust Law). Members shall respect fair competition and conduct every business activity in compliance with the applicable antitrust legislation and provisions.

5.5 Avoiding Conflicts of Interest. Decisions shall only be taken on the basis of objective, business-related considerations and not influenced by personal interests.

5.6 Protection of Confidential Information. Business secrets and personal information shall only be used to the extent to which they are necessary and permitted and they shall be protected appropriately.

5.7 Export/Import Legislation. Applicable legislation and regulations relating to export and import control as well as customs shall be adhered to.

5.8 Disclosure of Information. Information on the Member's business activities, structure, financial situation and performance shall be disclosed in accordance with the applicable provisions and usual business practices in the sector. The falsification of records and misrepresentation of conditions and practices in the supply chain are not acceptable.



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5.9 Intellectual Property. Intellectual property rights shall be respected; transfer of technology and knowhow must be done in a manner that protects intellectual property rights.

5.10 Responsible Procurement of Raw Materials. Members shall adopt appropriate measures which ensure to the best of their knowledge and belief that raw materials used in the manufacture of its products (tantalum, tin, tungsten, gold, etc.) do not directly or indirectly serve as means to finance or support armed groups that commit serious human rights violations. Members shall exercise due diligence with respect to the origin and chain of custody of such minerals and shall disclose these precautionary measures to RIGID upon request.