



Innovation, Know-how & Originality

IKO CODE OF ETHICS AND BUSINESS CONDUCT

At IKO, our commitment to ethical behavior is one of the most essential components of our operations. Our parent company, Nippon Thompson, has established a Code of Conduct governing corporate activities that both they and their affiliated companies, like IKO, must properly carry out to fulfill our social responsibility as corporate citizens.

As a company, we are committed to doing business the right way, and our employees are expected to always act lawfully, ethically and in the best interests of IKO International while performing their respective job duties. Long term, we can successfully face the challenges of a competitive marketplace by accepting the imperatives of moral responsibility, both as individuals and as a company. We will establish an in-house system to ensure that we are following our corporate Code of Conduct. We will also strive to do business with other organizations that also have impeccable human rights and compliance records.

1. Introduction

This Code of Ethics and Business Conduct of IKO International, Inc. serves as our ethical commitment and guide to proper business conduct for all of our stakeholders. Many of these guidelines are detailed in our Employee Handbook. IKO International is committed to doing business legally, ethically and in a transparent manner.

This document applies to all staff who work for IKO International, Inc. (including officers, directors, managers, team leaders, employees, temporary and interim employees, agencies, sub-contractors and consultant staff), and also applies to organizations that do business with us.

The success of our business is based upon the trust we earn from our employees, customers and shareholders. All staff are expected to adhere to this Code professionally and to treat everyone in our workplace with respect, honesty and fairness.

2. Open Door Policy

IKO International, Inc. is open to questions at any time and will not allow punishment or retaliation against anyone reporting misconduct in good faith. Our Open Door Policy is a Company-wide commitment to provide all staff with access to Management so they may ask questions, raise concerns, and receive a fair hearing and prompt resolution of work-related problems.

If you believe you have a work-related problem, suggestion or any concern or comment about any issue affecting the workplace, including harassment, please bring the issue to Management's attention immediately using the following steps:

- **Step 1:** We ask that you first discuss the issue with your Immediate Supervisor, who will either resolve the issue or advise you about how to proceed with the matter. If, for whatever reason, you do not believe that an initial discussion with your Immediate Supervisor is appropriate, you may proceed directly to Step 2.
- **Step 2:** If your concerns are not resolved after speaking with your Immediate Supervisor, or if you feel that a discussion with him/her is inappropriate, you may speak with the General Manager about resolving your issue.
- **Step 3:** If you feel the issue is still not resolved after speaking with the General Manager, you may speak with the President about resolving your issue. The President's decision/judgment will be considered final.



3. Core Values

Our core values at IKO International, Inc. help us to stand out as an essential and exemplary company:

Honesty • Integrity • Teamwork • Respect for others • Responsibility • Accountability • Reliability • Innovation • Know-How • Originality

4. Ethical Decision-Making

Ethical conduct is a value-driven method of decision-making. Several key questions can help to identify situations that may be unethical, inappropriate or illegal. Ask yourself:

Is what I am doing legal? • Does it reflect our company values and ethics? • Does it comply with the Code and company rules/policies? • Does it respect the rights of others? • How would it look if it made the news headlines? • Am I being loyal to my family, my company and myself? • Is this the right thing to do? • What would I tell my child to do? • Have I been asked to misrepresent information or deviate from normal procedure?

5. Sustainability: People + Profit + Planet

We are committed to sustainable business operations and to meeting current requirements without compromising the needs of future generations. To this end, we combine economic, ethical, environmental and social factors in our operation and our business decisions, and strive to work within the communities we serve in socially responsible ways.

6. Human Rights

We are committed to respecting human dignity and the rights of each individual with whom we interact during the course of work. We make every effort to respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights. Our staff shall treat everyone equally and with dignity, fairness, respect and care, ensuring that we promote a workplace free of harassment and discrimination; prohibit child labor, forced labor or human trafficking; provide fair and equitable wages, benefits and other conditions of employment in accordance with all governing laws; and recognize employees' right to freedom of association. We shall not, in any way, cause or contribute to the violation of human rights.

7. Health and Safety and Environment

We work to provide and maintain a safe, healthy and productive workplace, and remediate any risks of accidents and injuries. We are committed to minimizing our impacts on the natural environment of our operations. We make efforts to reduce the use of finite resources, like energy or water, and harmful emissions, like waste. Staff must comply with relevant health, safety and environmental protection laws, regulations and rules at all times.

8. Fair Labor Practices and Working Conditions

We are committed to promoting equality in our employment practices and to a fair employment and remuneration policy in compliance with applicable laws. We are firmly opposed to employing or contracting child or slave labor or any form of forced, compulsory or bonded labor. We condemn all forms of illegal, unfair and unethical labor practices that exploit the workforce, destroy social security or serve as tax evasion, including, but not limited to, undeclared and "grey" work or withholding of wages. Our staff shall act with integrity and treat their colleagues and others at work with full respect.

9. Discrimination and Harassment

We provide equal opportunity in employment and we do not tolerate any discrimination or harassment or any type of abuse. IKO International, Inc. is firmly committed to maintaining a work environment free of any type of harassment and intimidation based upon race, religion, creed, color, citizenship status, national origin, alienage, ancestry, age, sex, pregnancy, marital status, partnership/civil union status, affectional or sexual orientation, gender identity/expression, physical disability, mental disability, medical condition, military/veteran status, genetic predisposition or carrier status information, or any other characteristic protected by applicable federal, state, or local civil rights laws or ordinance. The Company also prohibits harassment by non-staff who have



contact with our staff during work hours. In addition, the Company prohibits bullying or intimidation of any sort by staff members or non-staff who have contact with our staff during work hours.

Any kind of discriminatory behavior, harassment, bullying or victimization is prohibited. Please see our Employee Handbook for further descriptions and examples of workplace harassment and bullying.

All staff are expected to follow the highest standards of conduct in all verbal and written communication based on mutual respect, and must refrain from any form of harassment, slander or any behavior that could be taken as offensive, intimidating, humiliating, malicious or insulting.

10. Diversity and Inclusion

IKO International, Inc. values and advances diversity, equity, inclusion and belonging (DEIB) in the workplace. Our company is committed to equal opportunity and is intolerant of discrimination and harassment on the basis of race, sex, color, national origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, or any other status protected by applicable law. This also includes any form of sexual harassment.

Qualifications, performance, skills and experience are the basis for employee recruitment, hiring, placement, development, training, compensation and advancement at our company.

11. Fair Competition and Business Conduct

Our relationships with business partners are built upon trust and mutual benefits compliant with the law. We are dedicated to ethical and fair competition. We sell products based on their quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities, nor will we engage or assist in unlawful boycotts of particular customers. We commit to compliance with all applicable trade controls, restrictions, sanctions and import-export embargoes.

We refrain from damaging competition and the reputation of any business partners, and any behavior that harms a competitor's credibility.

We do not maliciously, unlawfully or unduly withhold payments to our partners, and we do not allow such practices in our supply chain. We fight the unethical practice of "debt chain."

Our staff is responsible for ensuring fair business practices in performance of their duties and adhere to competition, consumer protection and fair marketing practices. Customers and business partners shall be treated fairly and equally, products shall be displayed in a manner that is fair and accurate (fair marketing and advertising) and that discloses all relevant information.

12. Anti-Corruption

We firmly condemn and do not tolerate any form of corruption. It is prohibited to directly or indirectly offer, promise, give, ask, solicit or accept any unfair advantage or benefit in order to obtain, retain or facilitate business in any way. An unfair advantage or benefit may include cash, any cash equivalent (e.g., voucher), gift, credit, discount, travel, personal advantage, accommodation or services. We do not permit facilitation (or "grease") payments to government officials or private business in order to secure or speed up routine actions. Corruption also includes the misuse of function or position, including the creation of a false impression that an employee can improperly influence a decision maker.

Corruption, either to obtain or retain business or to obtain or retain an advantage in the conduct of business, is considered gross misconduct. Similarly, accepting or allowing another person to accept a bribe is considered gross misconduct. Our staff must account for all benefits received in the course of doing business and must not give or receive bribes or otherwise act corruptly.



13. Gifts and Hospitality

We shall avoid any actions that create a perception that favorable treatment was sought, received or given in exchange for personal benefits.

Business courtesies or benefits include gifts, gratuities, meals, refreshments, entertainment or other advantage from persons or companies with whom we do or may do business. We will neither give nor accept such benefits that constitute or could reasonably be perceived as constituting unfair business inducements that would violate law, regulation or policies, or would cause embarrassment.

We may accept and offer occasional gifts and hospitality that are customary and conform to reasonable and ethical practices in the marketplace, that are not inappropriately excessive, that do not reflect a pattern of frequent acceptance and do not create the appearance of an attempt to influence business decisions. Only trivial gifts with low value can be accepted. All other gifts must be politely refused or, if received through the mail, returned to the donor. If return is not possible, the gift shall be offered for charity or community purposes. It is the responsibility of the person offering, providing, receiving or accepting the gift to decide whether the gift is appropriate.

14. Security, Protection and Proper Use of Company Assets

Company resources, including time, material, equipment and information, are provided for company business use. Employees and those who represent IKO International, Inc. are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work-related materials during work hours.

In order to protect the interests of the company's network and our fellow employees, IKO International, Inc. reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the internet or IKO International, Inc.'s proprietary sites and programs. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate. Please refer to the Employee Handbook for more information on safety, security and use of company assets. Questions about the proper use of company resources should be directed to your manager.

15. Confidentiality, Information Security, Proprietary Information and Intellectual Property

Integral to IKO International Inc.'s business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential suppliers and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization. We respect the property rights of others. We will not acquire or seek to acquire trade secrets or other proprietary or confidential information by improper means. We will not engage in unauthorized use, copying, distribution or alteration of software or other protected intellectual property.

16. Bookkeeping, True Reporting and Financial Integrity

Our corporate records must be true, accurate and complete, and company data shall be entered promptly in our books in accordance with the Company's and other applicable accounting principles.

We create, retain and dispose of our company records as part of our normal course of business in compliance with all of IKO International, Inc.'s policies and guidelines, as well as all regulatory and legal requirements. We commit ourselves to fair taxation and condemn all forms of money laundering. We are committed to do business with partners involved in legitimate business activities with funds from legitimate sources.



Staff must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of IKO International Inc.'s books, records, processes or internal controls.

17. Anti-Fraud

Fraud — the act or intent to cheat, steal, deceive or lie — is both unethical and, in most cases, criminal. Fraud in every form, (including e.g., submitting false expense reports; forging or altering financial documents or certifications; misappropriating assets or misusing company property; making any untrue financial or non-financial entry on records or statements) is prohibited.

18. Conflicts of Interest

Our decisions shall be based upon objective and fair assessments avoiding the possibility of any improper influence. A "conflict of interest" exists when an employee's personal interest (that can be linked to friends, family, customer, competitor, supplier, contractor entity, etc.) interferes or potentially interferes with the best interests of IKO International, Inc. Determining whether a conflict of interest exists is not always easy to do; thus, anyone with a conflict of interest question should seek advice from management.

Conflicts of interest could arise in these examples:

- Being employed (you or a close family member) by, or being in economic relation with an actual or potential customer, competitor, supplier or contractor.
- Hiring or supervising family members or closely related persons.
- Serving as a board member for another company or organization.
- Owning or having a substantial interest in a customer, competitor, supplier or contractor.
- Having a personal interest, financial interest or potential personal gain in any company transaction.

If co-workers become involved in personal relations with each other, the onus is on the senior employee concerned to bring this to the attention of his or her manager to confirm that there is no conflict of interest, nor will a conflict of interest arise.

19. Privacy, Personal Data Protection

We respect personal privacy and we acknowledge that employees, customers and others need to feel confident that their personal data is processed appropriately and for a legitimate business purpose. We are committed to complying with all personal data protection laws. We only acquire and keep personal information that is necessary and we give proper information on these activities to data owners. We implement proper security measures to assure confidentiality, integrity and availability of personal information. Our staff must observe legal requirements, apply compliant practices and follow related procedures to ensure legality of personal data handling and processing activities.

20. Media Inquiries and Social Media

IKO International, Inc. is a high-profile company, and from time to time, employees may be approached by reporters or other members of the media. In order to ensure that we speak with one voice and provide accurate information about the company, we should direct all media inquiries to: Marketing Manager Rosemarie Gardner or VP of Sales & Marketing Karl Wickenheisser. Employees should not issue a statement or press release without first consulting with them. They work with our appointed media agency to oversee all media placed by IKO International, Inc. Additionally, IKO has a Social Media Policy that outlines acceptable behavior when posting on social media. Please refer to the policy for details and restrictions.