

## **Eberhard Supplier Ethics Policy**

Eberhard Manufacturing Company is committed to the highest standards of product quality and business integrity in their dealings with customers and suppliers. As a result, all suppliers and Eberhard employees who work with them are expected to conduct themselves with the highest standards of honesty, fairness and personal integrity. It is critical to Eberhard that suppliers and employees alike maintain high ethical standards, adhere to all applicable laws, and avoid even the perception of impropriety or conflict of interest.

This policy applies globally to all Eberhard suppliers. "Supplier" here means any business, company, corporation, person or other entity that sells, or seeks to sell, any kind of goods or services to Eberhard, including the supplier's employees, agents and other representatives. Suppliers are expected to acknowledge this policy and to apply it in all dealings with, and on behalf of, Eberhard. Suppliers will be fully responsible for ensuring that any subcontractors, agents or other third parties will act consistently with this policy.

### **Laws and Regulations**

Eberhard's suppliers will comply with all laws, regulations and policies, including all applicable government contractual requirements, which flow down through contracts with Eberhard. This includes, but is not limited to:

- Applicable U.S. Small Business rules and regulations
- Affirmative Action and Equal Employment Opportunity rules and regulations
- Rules regarding suspension and debarment of companies from doing business with the U.S. Government and other similar laws and regulations applicable in other jurisdictions
- Walsh-Healey Public Contracts Act

### **Bribes, Kickbacks, and Gifts**

No one may, directly or indirectly, demand or accept, offer or give any kind of bribe, kickback or any other unlawful or unethical benefit to employees or other representatives of Eberhard. Suppliers will not offer gifts, discounts, payment fees, loans, entertainment, favors, or services of any kind with the intent to influence an agent's decision. Additionally, Eberhard employees will not accept these items from suppliers which may influence purchasing decisions.

### **Human Rights**

Eberhard recognizes that governments have the duty to protect human rights, and our company has a responsibility to respect human rights. To that end, we strive to respect human rights throughout our operations, products and services. All labor must be voluntary. Slave, child, underage, forced, bonded, or indentured labor will not be tolerated. Suppliers shall not engage in or support trafficking in human beings.