



SUPPLIER CODE OF CONDUCT

Introduction

This Supplier Code of Conduct, while not all inclusive, is established to serve as a guideline of expectations, highlighting some key laws and regulations, as well as outlining requirements that Champlain expects its suppliers to meet. Suppliers must take reasonable measures to ensure that their suppliers and sub-contractors act in accordance with this Supplier Code of Conduct.

Compliance with Applicable Laws, Regulations and Practices

Suppliers are required to act in accordance with all applicable federal, state and local laws and regulations. Where applicable, suppliers must comply with all relevant international laws.

Legal and Regulatory

- **Export Control Laws**
Champlain is subject to laws that regulate, restrict and sometimes prohibit business dealings with certain countries, entities and individuals. These restrictions include controls on export and re-export of goods that originate in the United States or that contain U.S. parts, components, subassemblies or assemblies. International Traffic in Arms Regulation (ITAR) rules may apply to products or technical data used in any type of military application. Suppliers must be aware of these restrictions.
- **Bribery and Corruption**
Champlain strictly forbids all bribery to anyone, anywhere. Suppliers must follow all anti-bribery laws throughout the world and educate their employees about compliance with these laws and specifically The United States Foreign Corrupt Practices Act (FCPA).
- **Fair Competition and Anti-Trust Compliance**
Suppliers must comply with all local anti-trust or anti-competition laws and regulations. These laws deal with agreements among competitors in an effort to engage in price discrimination or other acts that may unfairly reduce competition.

Workplace and Human Rights

- **Respect and Dignity**
We expect our suppliers to promote a safe, respectful and productive workplace by establishing and maintaining fair employment practices, including complying with laws that prohibit harassment.
- **Voluntary Employment**
Suppliers must ensure that no forced labor, including bonded, indentured and involuntary prison labor is used. Only voluntary employment may be utilized and workers must be allowed to terminate the employment at any time upon reasonable notice.
- **Child Labor**
Suppliers and their subcontractors are to ensure that child labor is not used in the performance of work. The term "child" refers to any person under the minimum legal age for employment where the work is performed.



- Working Hours, Conditions, and Wages and Benefits
Suppliers must comply with all applicable laws governing the number of maximum work hours, vacation time, leave periods and holidays. Suppliers' employees shall not work beyond the maximum working hours permitted by applicable law. Suppliers will compensate for overtime hours in accordance with applicable laws. Suppliers must comply with all applicable laws regarding working conditions, including worker health and safety, sanitation, fire safety, risk protection and electrical, mechanical and structural safety by implementing an employee safety management system. Suppliers must provide compensation, including regular wages and overtime hours, and legally mandated benefits, in accordance with all applicable laws and standards. Suppliers must maintain a safe and healthful workplace for their employees free of illegal drugs or controlled substances.
- Commitment to Freedom of Association
Champlain requires that its suppliers recognize and respect the rights of employees to freely associate, organize, and collectively bargain in accordance with all applicable laws. Additionally, Champlain encourages its suppliers to establish open communication and direct engagement between employees and management as a means by which to support positive employee relations.
- Non-Discrimination
All conditions of employment must be based on an individual's ability to do the job, not on the basis of personal characteristics or beliefs. Horton suppliers must not discriminate in hiring and employment practices based upon race, color, gender, gender identity or expression, religion, age, nationality, sexual orientation, social or ethnic origin, disability, pregnancy, political affiliation, veteran status, union membership or marital status.
- Employee Health and Product Safety
Suppliers must protect the health, safety and welfare of those who may be affected by their activities by complying with all applicable environmental health and safety laws, regulations and directives. Suppliers must also insure their contribution to product safety.

Conflict Minerals

We expect our suppliers to acknowledge that Champlain is subject to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act") and the implementing rule promulgated by the U.S. Securities and Exchange Commission (SEC) which will require reporting related to tin, tantalum, tungsten and gold (the "Conflict Minerals") contained in products.

Confidential/Proprietary Information

Suppliers should safeguard all sensitive information, including proprietary and confidential information disclosed by Champlain, physical property or personal data of Champlain and its employees and customers which is in their care or possession, and use any such information only for the business purpose for which it was provided.

Financial Responsibility/Accurate Records

We expect our suppliers to accurately record, maintain, and report business documentation, including but not limited to, financial accounts, quality reports, time records, expense reports, resumes and submissions to Champlain.

Environmental Responsibility

Suppliers must make every effort to protect the environment and must comply with all applicable laws and regulations. Champlain encourages all of its suppliers to consider registration to the international environmental standard, ISO-14001.