VELCRO SUPPLIER CODE OF CONDUCT

AUGUST 1, 2014

This Supplier Code of Conduct outlines the expectations of Velcro Industries and its affiliates (collectively "VELCRO") in the areas of business integrity, labor practices, employee health and safety, and environmental management. Suppliers, vendors, contractors, consultants, agents and other providers of goods and services (collectively "Suppliers") who do business with VELCRO are required to comply with this Supplier Code of Conduct. Please make your employees aware of our Supplier Code of Conduct. The VELCRO Supplier Code of Conduct is intended to complement VELCRO's other policies and standards referenced therein. Observance of the principles contained in this Supplier Code of Conduct is in addition to any other contractual obligations Supplier may have with VELCRO under any purchase order, service or supply agreements, or any other documentation between VELCRO and Supplier that applies to the provision of goods and services to VELCRO. The VELCRO Supplier Code of Conduct has been translated into multiple languages and may be downloaded from VELCRO's website to share with your organization as appropriate.

Business Conduct Principles

VELCRO expects its Suppliers to conduct business ethically, in compliance with the law, with integrity, honesty, and transparency, and to adhere to the following principles:

- **1. Comply with the Law.** Suppliers shall operate their business in compliance with all applicable laws, rules and regulations of the countries in which they operate their business.
- 2. Prohibit use of child labor. Suppliers shall only employ workers who meet the applicable minimum legal age requirement defined by national law or regulation, and comply with relevant International Labor Organization (ILO) standards. Allowing children to perform work that improperly interferes with their ability to attend school or work that exposes them to undue physical risks that can harm physical, mental, or emotional development is prohibited.
- **3. Prohibit all forms of forced or compulsory labor.** Suppliers shall not use any indentured, coerced or forced labor, slavery or servitude, and shall not use physical punishment, threats of violence or other forms of physical, sexual, psychological or verbal abuse as a method of discipline or control.
- **4. Provide fair wages, working hours and benefits.** Suppliers shall ensure working hours, wages and benefits are consistent with laws and industry standards, including those pertaining to minimum wages, overtime, other elements of compensation, and legally mandated benefits.
- **5.** Encourage a diverse workforce and provide a workplace free from discrimination. Suppliers shall make employment decisions based on qualifications, skills, performance and experience, and not on personal characteristics or beliefs.
- **6.** Respect employees' right to freedom of association and collective bargaining, consistent with local laws. Suppliers shall respect employees' rights to join or refrain from joining associations and have the freedom of collective bargaining where the local law confers such rights.
- **7. Provide safe and healthy working conditions.** Proactively manage health and safety risks to provide an incident-free environment where occupational injuries and illnesses are prevented. In addition, Suppliers shall provide potable drinking water and adequate restrooms; fire exits and essential fire safety equipment; emergency aid kits and access to emergency response including environmental, fire and medical.
- **8.** Carry out operations with care for the environment. Suppliers shall comply with all applicable environmental laws and regulations, and consider opportunities in their operations for conservation of natural resources, recycling, source-reduction and pollution control to ensure cleaner air and water and to reduce landfill wastes.
- **9. Compete fairly for VELCRO's business.** Suppliers shall comply with applicable laws addressing bribery and corruption, competition, or the ownership and use of intellectual property rights. Offering, providing or accepting bribes, kickbacks or anything of value to secure an improper business advantage undermines free enterprise and the essence of competition. In addition, soliciting or making arrangements or agreements with customers, suppliers, government officials, or other third parties to secure a personal benefit or business advantage through improper or illegal means is strictly prohibited.
- 10. Observe VELCRO's policies regarding gifts and entertainment and conflicts of interest when dealing with VELCRO employees. Suppliers are prohibited from offering or providing gifts to VELCRO employees that violate VELCRO's Gifts and Entertainment Policy and Conflict of Interest Policy. Please note that these policies apply to ALL employees and departments of VELCRO. You should NEVER be asked by a VELCRO employee for a gift or entertainment nor are you EXPECTED to provide a gift/entertainment to any VELCRO employee or department. Violation of these policies may inappropriately influence VELCRO's business decisions or result in an unfair advantage, which violation may result in the immediate loss of all existing and future VELCRO business.

Application to Sub-Contractors

This Supplier Code of Conduct also applies to any sub-contractor(s) to the Supplier that provides goods or services to the Supplier. The Supplier is fully responsible for ensuring compliance by any such sub-contractor(s) as if it were the Supplier itself.

Audit

With prior notice, VELCRO may conduct reasonable audits to verify Supplier's compliance with the Supplier Code of Conduct. VELCRO reserves the right to audit the Supplier's sub-contractors for compliance to VELCRO's Supplier Code of Conduct and Supplier will accommodate VELCRO's audit as required.

Event of Violation

If the Supplier does not comply with this Supplier Code of Conduct, VELCRO may require that the Supplier implement a corrective action plan to cure the non-compliance within a specified time period (furnished to VELCRO in writing). If the Supplier fails to meet the corrective action plan commitment, VELCRO may terminate the business relationship, including suspending placement of future orders and potentially terminating current production. VELCRO reserves the right to hold supplier responsible for reasonable costs of investigating non-compliance.

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VELCRO encourages Supplier to utilize the following reporting mechanisms if Supplier has knowledge that a VELCRO

employee is engaging in (or has engaged in) conduct that violates any of the VELCRO policies referenced herein:

Email: compliance@velcro.com