



**FEEL THE SW
DIFFERENCE™**

CODE OF CONDUCT

A MESSAGE FROM OUR CEO



Dear Team,

SHEN WEI U.S.A. INC., **SW SAFETY SOLUTIONS INC.**, or **SW** success begins and ends with you – our dedicated and caring employees. For me personally, I am driven to make Shen Wei a great place to work for all employees. I want our company to be a place where you can spend your entire career feeling accepted, challenged, and valued.

Every day, we must foster a ‘people-first’ culture where employees are empowered to Do the Right Thing. The Right Way. Our dynamic and distinct culture allows us to operate by the same standard – one that unites us and defines who we are as a company.

Our Code of Conduct provides guidance and insight into how to act in accordance with this standard. We must always act with integrity and comply with all internal policies and external laws. Our reputation and success depend on it.

While the Code cannot address every situation you may face, it is a good place to get a better understanding of the rules that apply to your job. We want you to feel comfortable speaking up if you have a question, issue or concern. A good place to start is generally your supervisor or Human Resources. Rest assured that when you **SPEAK UP**, it is our job to listen and respond. We will not tolerate any type of retaliation for an issue or concern that is raised in good faith.

I greatly appreciate all you do and want to personally thank you for committing to and adhering to the Code of Conduct.

Sincerely,

Belle Chou
President and Chief Executive Officer
SW

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DISCLAIMER AND WAIVER

CONFIDENTIAL INFORMATION AND PRIVACY

This Code of Conduct contains information pertaining to certain policies and practices applicable to employees of the various direct and indirect subsidiaries of SW. “SW” or the “Company” used in this Code of Conduct refers to any direct or indirect subsidiary of SW.

This edition of the Code of Conduct supersedes all prior versions as well as any, and all other Company policies to the extent inconsistent with this Code of Conduct. Any amendment or waiver of our Code may only be granted by the President.

We expect each employee to read this Code of Conduct carefully as it is a valuable reference for understanding your job responsibilities. If you have any questions or concerns about this Code of Conduct, please ask your supervisor, or Human Resources at HR@swsafety.com.

None of the Company’s personnel documents or benefit plans, including this Code of Conduct, constitutes, or is intended to constitute, an express or implied contract guaranteeing continued employment for any employee or creating any other contractual right. No supervisor or Company employee has any authority to enter a contract of employment, express or implied, that changes or alters the at-will employment relationship.

This Code of Conduct is the property of SW and all rights are reserved.



WHO IS SW?

MISSION STATEMENT

SW® was founded with a single purpose: to make our customers more successful.

We realize, to do this we must make demonstrably better products that will allow people to do what they do best. This requires us to invest in quality manufacturing, focus on new product development, and create new features that benefit those who rely on our products every day.

OUR PRINCIPAL COMMITMENTS

- *Our People First:* The SW family are the foundation for our success. We commit to taking care of each other, our customers, our communities, and the environment.
- *Success Through Integrity:* Our success is based not only on the results we achieve, but how we achieve them. We commit to being accountable, honest, trustworthy, ethical, and compliant in all we do.

OUR CORE VALUES

- *Inclusion and Diversity:* SW is built on cultivating respect, trust, open communications, and diversity of thought, as well as, people.
- *Stakeholders:* We place our stakeholders at the center of what we do and strive to promote their success every day.
- *Safety:* We make safety a core value without compromise. Unsafe actions and conditions are not tolerated.
- *Environment:* We are responsible stewards of the environment and champions for sustainability.

**IN THE SIMPLEST TERMS, OUR VALUES COME DOWN TO THIS:
Do the right thing. The right way.**

This idea sets the standard for our Fundamental Commitments and Core Values and guides our daily actions and decisions.



OUR CODE'S PURPOSE

“
*If you are not willing to
learn, no one can help you.
If you are determined to
learn, no one can stop you.*



ABOUT OUR CODE

Our reputation rests upon our daily actions and the decisions we make every day. Do the Right Thing. The Right Way. is the road map for how we align our daily actions with our Principle Commitments and Core Values. Our Code of Conduct outlines how we treat each other and how we conduct our business.

SW must comply with all laws and regulations that apply to our business. Every employee is responsible for complying with this Code, SW policies and all applicable laws and regulations. You must also act in a manner consistent with our Principle Commitments and Core Values.

CODE APPLICATION

This Code refers to SW and its subsidiaries the “Company.” The Code applies to every SW employee. We also expect our consultants, contractors, vendors, and other business partners to act in a manner consistent with our Code when conducting business on our behalf.

UNDERSTANDING OUR CODE

You should be generally familiar with the entire Code, even though some sections may not directly apply to your daily activities.

THE RIGHT THING

If you have any questions regarding the Code of Conduct or wish to report any alleged violations of this Code, please contact the HR Department at HR@swsafety.com.

EXPECTATIONS AND GUIDANCE

The following summarizes some of the key expectations for complying with the Code and our commitments and values. They include expectations that apply to all our employees and additional expectations for our leaders.

OUR PRINCIPAL COMMITMENTS

- Promote and display our commitments and values through your daily words and actions.
- Engage and take ownership of compliance and ethics.
- Know and proactively comply with the Code and Company policies.
- Protect and strengthen the Company's culture and reputation.

EXPECTATIONS FOR OUR LEADERS

- Foster a SPEAK UP environment based on trust that is free of a fear of retaliation.
- Help your employees understand their compliance responsibilities.
- Set an example by holding yourself and your employees accountable to Do the Right Thing. The Right Way.
- Evaluate your employees not only on their results, but how they achieve them.

SPEAK UP. LISTEN UP. FOLLOW UP.

- Everyone is expected to SPEAK UP immediately when they have a question, issue, or concern.
- When you SPEAK UP, a good place to start is generally your supervisor or Human Resources Representative.
- When you SPEAK UP, the Company will LISTEN UP and FOLLOW UP.
- The Company strictly prohibits any form of retaliation when someone SPEAKS UP in good faith and has reasonable cause to believe that the information discusses a violation of law, this code or company policies.



**SPEAK UP.
LISTEN UP.
FOLLOW UP.**

“*Do something today that
your future self will thank
you for.*”



SPEAK UP

SW cares and expects you to SPEAK UP when you have any type of compliance or ethics question, issue, or concern. This includes complaints or concerns about harassment, discrimination, fraud, safety, the environment, accounting irregularities or theft.

We need you to SPEAK UP immediately if you are aware of any possible violation of our Code of Conduct, Employee Handbook, Company policy or external law, rule, or regulation to prevent future misconduct. Our Company policies do not restrict you from reporting any potential violation of laws or regulations to relevant government authorities.

When reporting an issue or concern, provide all relevant details so that it can be fully investigated.

We investigate all reported concerns. Anyone who knowingly makes a false complaint, threatens others, or maliciously damages another person's reputation will be subject to disciplinary action, up to and including termination.

LISTEN UP | FOLLOW UP

No matter how an issue or concern is reported, it will be reviewed and appropriately investigated based on the information provided. It will be treated confidentially to the extent possible considering the Company's need to follow up and investigate your concern.

We respond immediately to reports of illegal activities, security issues, accounting or auditing irregularities, SW policy violations, or health and safety concerns by working with the appropriate teams.

You may be asked to participate in an internal investigation into potential issues or concerns or investigations conducted by an external third party. If asked, you must fully cooperate. This includes:

- Disclosing any relevant information in a complete and honest manner.
- Not discussing investigation details with anyone outside of the investigation.
- Not interfering with the investigation or providing misleading information.

ZERO TOLERANCE FOR RETALIATION

We know it takes courage to share your concerns. We will not retaliate or permit retaliation against anyone for speaking up and has reasonable cause to believe that the information discusses a violation of law, this code or company policies. SW strictly prohibits any form of retaliation against any employee who SPEAKS UP in good faith.

Forms of speaking up:

- Raising questions, issues, or concerns in good faith.
- Making a report of possible misconduct or legal violations to us or a government authority.
- Assisting in an investigation of alleged misconduct.

We take claims of retaliation seriously. Allegations of retaliation will be investigated, and appropriate action taken.

GUIDANCE ON HOW TO DO THE RIGHT THING. THE RIGHT WAY.

When in doubt,
ask yourself these
questions:

Is it legal?

Is it in
compliance
with our Code,
policies, and
procedures?

Would
your team
members, your
supervisor, and
the Company
approve?

Would
you be proud if
your action was
publicly
displayed?

If you can answer “yes” to all these questions without any doubts, then confidently proceed. If you answer “no” to any of these questions or are not positive about the answer, then SPEAK UP and seek guidance on how to Do the Right Thing. The Right Way.

TAKING CARE OF EACH OTHER

“*Unity is strength. When there is teamwork and collaboration, wonderful things can be achieved.*”



The Company's success is based on the actions of its proud, engaged, and resilient team members. It all starts with us taking care of each other. We must:

- Work cooperatively as a team.
- Respect the dignity of each individual.
- Listen openly to concerns and suggestions.
- Approach disagreements with an open mind.
- Comply with all policies, laws and rules that apply to our work.

EMPLOYMENT EQUALITY

We never make employment decisions or engage in harassment based on:

- Race
- Color
- Sex
- Pregnancy
- Sexual orientation
- Gender identity expression
- Religion
- Marital status
- Age
- National or ethnic origin
- Disability
- Genetic information
- Veteran status
- Citizenship status
- Any other characteristic protected by applicable federal, state, provincial or local laws

We also make reasonable accommodations for employees or applicants with a disability unless undue hardship would result.

INCLUSION AND DIVERSITY

We are committed to fostering a diverse and inclusive work environment. We embrace and cultivate respect, trust, open communications and diversity of thought and people. We strive to attract, develop, and retain a workforce that is as diverse as the markets we serve. This ensures an inclusive work environment that embraces the strength of our differences and allows employees to maximize their potential.

Your caring attitude plays an important role in creating a workplace where everyone treats each other with honesty, dignity, and courtesy. This fosters an atmosphere of trust, openness, candor and belonging.

ANTI-HARASSMENT

You must not harass others while at work or work-related functions. When representing the Company, you are expected to be courteous, polite, respectful, and professional to everyone. This same conduct applies to how you treat our customers, partners, vendors, and suppliers. We will not tolerate abusive, threatening, offensive or intimidating verbal or physical conduct whether at work or outside of work hours that harms a person's ability to do his or her work or otherwise affects the terms and conditions of his or her employment.

Any employee who feels threatened, harassed, or discriminated against, or who witnesses such conduct, should SPEAK UP immediately.

WORKPLACE VIOLENCE

We have a zero-tolerance policy for acts of violence and behavior that could lead to or cause workplace violence. You are prohibited from engaging in any act that could cause another individual to feel threatened or unsafe. This includes:

- Verbal assaults
- Threats of violence or intimidation
- Aggression
- Hazing
- Vandalism
- Causing physical harm to someone
- Intentionally damaging property
- Sabotage

ALCOHOL AND DRUGS

We take care of each other. We follow our safety procedures and promote a culture of safety. To ensure the safety of our employees, customers, and the communities in which we operate, SW takes a zero-tolerance approach to drugs and alcohol in the workplace. No person may use, transfer, sell, possess, make, consume, handle, inhale, purchase, transport or otherwise be involved with alcohol or unlawful drugs while on Company property, or customer property. We prohibit employees from performing any work while under the influence of alcohol, cannabis/marijuana, or unlawful drugs. Under limited circumstances, alcohol use may be allowed for some Company-sponsored events. Such events must be approved by management and cannot be scheduled before or during an employee's workday.

Over-the-counter drugs and medication prescribed to you by a doctor can also affect your ability to do your job. You should not work if any prescribed or over-the-counter drug causes safety or performance concerns. If a prescription drug interferes with or in any way impacts your ability to perform your job, you must notify your supervisor or Human Resources.

RIGHT THING

You are entitled to a workplace free from harassment. We are committed to a harassment-free environment.

Everyone must remain alert to violent or illegal behavior at our workplaces. If anyone is in immediate danger, call your local emergency number.

SAFETY

Our “Mission to Zero” Culture

We are committed to safety at our facilities, on the roadways and in our communities. No matter what you do, where you work, or what line of business you are in, you are expected to put safety first.

We take care of each other by following our health and safety rules and procedures, as well as all applicable laws and regulations.

You should always SPEAK UP if you:

- Are asked to do a job or task you consider unsafe.
- Are asked to be non-compliant with a rule, regulation, or law.
- Are asked to do a job you think you are not properly trained to perform.
- See someone performing a task that you think is unsafe or that the person is not properly trained to do.
- Observe or are made aware of an unsafe condition or potential danger to others or yourself.


We keep everyone at SW safe by:

- Obeying all safety standards that apply to our jobs.
- Ensuring that everybody is properly trained to perform their job.
- Learning to recognize potential workplace risks and when we see something, say something.
- Providing feedback to colleagues if they are not working safely and accepting feedback provided.
- Committing to the safety of our co-workers, customers, and communities like we would your own families.
- Being proactive and finding ways to make our workplace safer.



TAKING CARE OF BUSINESS

“*Sometimes the smallest step
in the right direction ends
up being the biggest step of
your life.*”



CONFIDENTIAL INFORMATION AND PRIVACY

You must protect the confidential information of our Company, our employees, and our business partners. As part of your job, you may acquire certain information about SW, its customers or other third parties that is confidential, non-public and/or proprietary. You should assume this information is confidential and non-public unless the Company has publicly released the information. This information can also be referred to as “highly restricted.” Confidential information includes, but is not limited to:

- Employee and applicant data
- Personal information
- Pricing and cost data
- Proprietary business processes and procedures
- Financial data
- Trade secrets
- Computer software
- Marketing and sales programs
- Customer or third-party information

Always take reasonable and necessary precautions to protect any confidential information. You must only share confidential information on a need-to-know basis, even with people inside the Company.

You should not take, use or disclose any confidential information to anyone outside of SW, even to members of your own family, unless the disclosure is properly authorized and approved by SW’s President and CEO.

All confidential information must be stored only in our authorized, protected, access restricted locations. It must not be transmitted outside SW (including emailing to a personal email address or any third-party account) without authorization and proper safeguards. Confidential information may never be used for personal gain.

CONFIDENTIAL INFORMATION AND PRIVACY cont.

You have a duty to protect our confidential information. Your responsibility continues after your relationship with the Company ends.

We respect the privacy of our customers, co-workers, and business partners. We handle personally identifiable information and other information with proper care and diligence.

The information covered by this section should only be used and shared in a manner allowed by our policies and applicable laws and regulations.

USE OF COMPANY INFORMATION AND ASSETS

SW's property is intended to be used for business purposes. We must preserve these assets and use them wisely. This property includes, but is not limited to:

- E-mail and voicemail
- Computers and mobile devices
- Confidential and proprietary information
- Facilities and other workplaces
- Company documents and data
- Computer networks and software
- Access to and use of the Internet
- Other technology resources

Personal use of Company computers, networks, printers, mobile devices, e-mail, and the Internet should be kept to a minimum and cannot have a negative impact on productivity. The usage also cannot negatively affect the functioning of these systems. Under no circumstances, can you use Company property for illegal or inappropriate purposes. Other types of personal use of Company property are not permitted unless approved by your supervisor or Human Resources.

When we grant you access to our systems and networks, we assign you an individual login account with a confidential password. You are personally responsible for all activities that take place using your assigned account. Company policy requires that you protect the confidentiality of your password. You should never share this password or allow another person to use your account.

Employees must make sure Company-owned mobile devices or personal devices that are being used for Company business are always physically protected, and that updates and patches are installed as scheduled.

You should be aware of cyber security risks and contact the information security team at IT@swsafety.com immediately if you have any questions, issues, or concerns.

Employees cannot use Company systems to send, knowingly receive, store or forward messages that contain information that is:

- Abusive
- Threatening
- Malicious
- Unlawful
- Sexually explicit
- Harassing
- Discriminatory
- Hostile

You must also not knowingly access websites that contain this type of information.

Our computers will be used in accordance with applicable software agreements and laws. Employees must not duplicate, install, or use software in violation of its copyright or applicable license terms.

Employees must not install software on a SW-issued computer without approval from their manager, and the software must have been purchased by SW. Employees may not make copies of electronic data, unless permission has been obtained from the copyright owner.

Additionally, scavenging or taking materials that are intended for disposal or recycling is prohibited.

INTELLECTUAL PROPERTY

SW's intellectual property is a valuable asset. Some examples of intellectual property include:

- Copyrights
- Patents
- Trade secrets
- Trademarks
- Inventions
- Ideas and Innovations
- Improvements
- Software
- Discoveries


We take measures to protect our intellectual property rights. You cannot use any of the Company's intellectual property without the Company's permission. In certain instances, the Company may have ownership rights to intellectual property you create or develop. You must promptly notify COO and/or the President and CEO of any intellectual property that you discover, develop, or create as part of your job or that relates to the Company's business.

We also protect the intellectual property rights of third parties. You are prohibited from making unauthorized copies of copyrighted written documents, computer software or other intellectual property without permission of the owner or its licensor.



TAKING CARE OF COMMUNITIES

“*Life doesn't require us to be the best. Only that we try our best.*”



CORPORATE CITIZENSHIP

SW is committed to protecting human health and the environment. We will help make communities in which we live and work safe, resilient, and sustainable. We conduct ourselves in a safe, responsible, and respectful manner while helping to build better communities, protecting our natural resources, and doing the right thing. We focus on initiatives that support our employees, enhance our environment, promote education, and improve the livability of our communities.

CHARITABLE CONTRIBUTIONS AND DONATIONS

Successful communities depend on involved citizens, organizations, and corporate partners. We lend support and services to causes that promote civic pride and economic development. We want to help communities solve their specific challenges by being part of the solution.

GIVING GUIDELINES

SW has specific guidelines regarding the programs it supports. We concentrate on initiatives that enhance our environment, promote education, and improve the livability and resiliency of our communities. We are committed to enhancing our communities through programs that help make them cleaner and better places to live.

ENVIRONMENT

We are responsible stewards of the environment and champions for sustainability. There are a variety of federal, state, provincial and local laws and regulations that apply to our business. We have developed processes and tools to achieve a high standard of environmental performance and compliance. These processes and tools have been pulled into one Company-wide program that we call SW's Environmental Management System (EMS). The focus of the EMS is integrating environmental functions into the core of our business. It enables us to reduce our environmental impacts and increase our operating efficiency. Every employee should be aware of our EMS.

Our daily actions and decisions must reflect our commitment to advance environmental stewardship. We do this by aligning our environmental priorities with those of our customers, communities, and regulators.

This can be seen in our efforts to:

- Reduce our use of natural resources.
- Eliminate potentially harmful environmental impacts.
- Foster a culture that considers the environment in every business decision.
- Implement proactive environmental practices that differentiate us from our competitors.

Openly discussing the importance of protecting the environment supports this commitment and promotes a strong culture of compliance.

As a company, we prepare for emergencies by maintaining an Emergency Situations and Evacuation Plan Policy. This policy states management objectives for addressing emergency situations.

We expect employees to help us meet our environmental goals and expectations by:

- Following Company policies and procedures.
- Complying with laws and regulations.
- Operating our assets in an environmentally sound and safe manner.
- Identifying, communicating, and mitigating risks to people and the environment.

For more information on our sustainability efforts, please contact the Human Resources department at hr@swsafety.com.

SOCIAL MEDIA

There are many ways to communicate and exchange ideas and opinions through social media. Social media can include:

- Networking sites
- Personal web pages
- Blogs
- Videos
- Podcasts
- Live chats
- Internet discussion forums
- Tweets
- Text messages
- Instant messages

SW respects the legal rights of its employees in all countries in which we operate. Your online posts may not be anonymous and may affect the Company's reputation. When you use social media to post information, comment and exchange ideas related to the Company or its business, you are individually responsible for the content. SW's social media guidelines cover using social media to post information, comment or exchange ideas related to the Company or its business.

Tips for Using Social Media:

- Do not defame, harass, threaten, or discriminate against co-workers, customers, partners or suppliers.
- Do not disclose Company or third-party confidential or proprietary information.
- Do not speak on behalf of SW.
- Do not discredit Company services or products.
- Do not use any type of mobile device or computer to access social media while you are driving or operating a Company vehicle or piece of machinery or equipment.
- Any personal use of social media during work hours should be kept to a minimum and comply with other applicable Company policies.

INTEGRITY IN OUR ACTIONS

“*Your beliefs don't make you a better leader. Your behavior does.*”



CONFLICTS OF INTEREST

When conducting SW business, you must always act in the Company's best interest and avoid any actual or perceived conflicts of interest.

A “conflict of interest” can arise when your personal interests or relationships interfere with your loyalty to SW. An example of a conflict of interest is when your own personal interests (or those of a family member) affect your ability to do what is best for the Company.

You should:

- Identify situations that create a potential or actual conflict of interest or even the appearance of one.
- Disclose any potential conflicts of interest immediately to your supervisor and Human Resources.

Often conflicts can be easily avoided or addressed if they are promptly disclosed. Once your conflict is disclosed, your supervisor and Human Resources will comply with Company policy process for reviewing and determining:

- Whether an actual conflict of interest exists.
- Whether it can be managed or waived.
- What steps need to be taken to avoid any conflict moving forward.

While it is not possible to identify every potential situation that could present a conflict, the following are some of the more common conflicts of interest situations. If you are presented with one of these situations or something similar, you should immediately contact your supervisor and Human Resources for guidance on how to proceed.

PERSONAL RELATIONSHIPS IN THE WORKPLACE

You cannot have a family member or a person with whom you are romantically involved or dating directly report to you.

It is also potentially a conflict of interest if you have a family member or a person with whom you are romantically involved in your line of management or department.

You must also avoid putting yourself in a position where you could influence employment matters – including hiring, promotion, performance evaluation, termination, work assignment or the general work environment – involving a family member or a person with whom you have a close relationship.

OUTSIDE EMPLOYMENT AND ACTIVITIES

You may not accept outside employment that interferes with your job responsibilities. This restriction also applies to participating in outside activities.

Examples of how outside employment or activities could result in a conflict of interest include:

- Interfering with your fitness for duty.
- Interfering with your work performance at SW.
- Inappropriately using work hours to complete tasks for your outside employment or activity.
- Inappropriately using Company property and information for your outside employment or activity (e.g., printers, software, computers, supplies and confidential information).

To ensure your outside employment or activity does not interfere with your SW job responsibilities, you must review and comply with the Company's policies contained in this Code, as well as those contained in the Employee Handbook (e.g., timekeeping, leaves of absences, use of Company assets and confidential information).

The Company requires you to get approval from your supervisor and Human Resources prior to doing any outside work for a competitor, supplier, or vendor.

FINANCIAL INTERESTS

A potential conflict could occur when you, a family member or someone with whom you have a close relationship has a direct or indirect financial interest in, or may receive a personal benefit from, a transaction or business relationship with the Company.

BUSINESS OPPORTUNITIES

You are prohibited from personally taking business opportunities that you learn about through your position at the Company.

OUTSIDE INVESTMENTS WITH VENDORS, SUPPLIERS OR COMPETITORS

A potential conflict could exist when you, a family member, or someone with whom you have a close relationship has an investment in (or exercises control over) one of SW's vendors, suppliers, customers, or competitors. You should disclose an ownership if the ownership is one percent or more (> 1%) of the vendor, supplier, customer, or competitor.

GIFTS AND BUSINESS ENTERTAINMENT

When used appropriately, the exchange of certain gifts and business entertainment can help build and strengthen business relationships. Gifts and business entertainment must never be used to influence, or appear to influence, a business decision. They also should never create, or give the appearance of, a conflict of interest. SW competes solely on the merits of its products and services.

A gift is considered anything of value accepted from or given to a third party. Business entertainment is considered entertainment that has a specific business purpose and is viewed as a normal part of doing business. This includes such things as an occasional meal with a customer and attending an event with a vendor.



Gifts and business entertainment cannot be a bribe, payoff, kickback, influence, or improper payment. The gift and/or business entertainment must:

- Be permitted by law.
- Have a legitimate business purpose.
- Comply with any applicable Company policies and procedures.
- Be reasonable in value and appropriate under the circumstances.
- Be offered to you, not solicited by you.
- Be infrequent and in good taste.

Most government officials and employees have significant restrictions on accepting anything of value. This includes gifts and business entertainment. If you are providing something of value to a government or foreign official, it is your responsibility to understand and comply with all local laws, rules, and regulations.

ACCURACY OF RECORDS AND FRAUD

Our business and financial records must be accurate and complete. Many people inside and outside our Company rely on the accuracy of our records. This includes our statements to investors, government agencies, customers, vendors and the public. We each have a responsibility to create records that properly document our business transactions. We must ensure that Company information is complete, accurate, reliable, and protected.

Our financial records and accounts must be maintained in reasonable detail. They must accurately, timely and fairly reflect all our assets, liabilities, revenues, expenses, and other financial transactions. We must ensure that all transactions are properly authorized and accurately recorded in accordance with Generally Accepted Accounting Principles. All transactions must also comply with our record keeping policies. We have internal controls to provide reasonable assurance of our compliance with policies, procedures, laws, and regulations.

Falsifying Company information, coercing or asking others to submit false information or documentation is prohibited. This includes information or documentation that is stored in writing or electronically. We never intentionally delay recording transactions or events that are in violation of policies, laws, or regulations.

We also never intentionally record incorrect, incomplete, or misleading information about any transaction or event. No secret or unrecorded funds or assets may be established or maintained for any purpose.


Fraud starts with knowingly providing false or misleading information. It also includes the concealment of important information. In addition to violating this Code, there may be criminal penalties for fraudulent acts, especially those intended to influence, impede, or obstruct an audit, investigation, lawsuit, or other matter.

We cooperate with all government inspections and external audits. During a government inquiry, we never:

- Conceal, destroy, or alter any Company documents.
- Lie or make misleading statements to a government investigator.
- Obstruct the collection of information, data, or records.
- Cause another employee to fail to provide accurate information.

INTEGRITY IN OUR BUSINESS OPERATIONS

“*If you want to go fast, go alone. If you want to go far, go together.*”



OUR CUSTOMERS

Customer-Facing Communications

In all our customer communications and activities, regardless of medium, channel or topic, SW is committed to meeting the highest standards in truthfulness and honesty. We always provide clear and accurate information about our pricing, services, and products. We substantiate all claims before they are aired or published.

Commercial and Residential Customers

We negotiate customer contracts in good faith and in a fair and ethical manner, without discrimination or deception. We perform and comply with applicable laws, regulations, and the terms of our customer contracts.

OUR SUPPLIERS

We maintain good relationships with our suppliers; they are our partners.

When working with suppliers, we:

- Select suppliers fairly and objectively.
- Deal honestly in contract negotiations.
- Work with our suppliers to honor our commitments.
- Exercise good business judgment.

CHOOSING SUPPLIERS

Among other considerations, SW considers the supplier's ability to deliver the best combination of quality, cost, delivery, sustainability, technology and/or service.

SUPPLIER DIVERSITY

We are committed to a diverse supplier base. When competitively sourcing products, goods and/or services, we will include minority/women-owned businesses, veterans, and small and disadvantaged businesses where such a supply base exists.

INTERNATIONAL TRADE

Our import and export transactions comply with all applicable laws, rules, and regulations. We also follow trade sanctions and import/export restrictions that are applicable to our business.

GATHERING COMPETITIVE INFORMATION

We can obtain competitive information through public, ethical, and legal means – such as public conferences and documents, magazines, trade journals and other written information that has been published or is otherwise publicly available. Pricing, terms, and other market information may be obtained from or given to customers and suppliers in the ordinary course of business. Such information should not be obtained from competitors. We never seek information through improper means, such as hacking into restricted-access websites or computer systems, illegal pretexting (pretending to be someone else to get information), burglary, spying or wiretapping.

We always respect the proprietary information and trade secrets of others. If we are obtaining information from another person, and we know that information is protected by a confidentiality or non-disclosure agreement, we never solicit or accept information that would violate that agreement, even if we are not a party to it. For instance, if we are aware of a confidentiality agreement between an employee and his or her former employer, we never solicit or accept information from that employee (or his or her former employer) in violation of that agreement. We do not ask or encourage newly hired employees to divulge proprietary information about their former employers.

We never use illegal means to obtain confidential or proprietary information of others. Further, we never disclose any customer or vendor proprietary information to third parties, unless the owner of the information properly authorizes its release or disclosure.

ANTI-CORRUPTION AND BRIBERY

SW is committed to integrity and ethical business practices. We do not tolerate bribery of anyone, at any time. We also prohibit any other form of corruption. When conducting business in the U.S., Asia, or other countries, we comply with all laws, rules, and regulations. We never allow our employees, or anyone acting on our behalf, to give or accept bribes, kickbacks, or other improper payments.

Anti-corruption laws and regulations prohibit anyone from promising, offering or receiving a bribe. They also prohibit people from indirectly offering or receiving bribes through third parties. Companies, their employees and government and foreign officials are all required to comply with these laws and regulations.

A bribe can be offering, giving, or receiving anything of value to improperly influence a business decision. It does not matter if a bribe is paid; just offering to pay a bribe can be illegal. Bribes are not always obvious, but may include:

- Cash or cash equivalents (e.g., gift cards)
- Gifts
- Business entertainment
- Charitable contributions
- Favors
- Offering a job

Laws in other countries may be different from your own. When doing business internationally, you must always be aware of the laws and regulations of the country in which you are doing business.

Some countries or laws may allow facilitation payments to be made to speed up a process. These types of payments are made to expedite ministerial or clerical acts that a party is entitled to receive by law. SW prohibits all facilitation payments.

If you are ever asked to pay a bribe or facilitation payment, contact SW's COO immediately. No employee will suffer adverse consequences for refusing to be involved in a bribe, even if it results in the Company losing business. Violating any corruption law or related Company policy can have serious consequences for those involved and the Company.

They can include:

- Damage to Company reputation
- Employee termination
- Fines and penalties
- Lawsuits
- Jail time





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