



## SKC COMMUNICATION PRODUCTS, LLC

### CODE OF CONDUCT

At SKC, we place a high value on honesty and integrity as well as delivering quality service to our customers. SKC has policies in place to help you understand what we consider right and wrong when conducting business. We thank you for your contribution to SKC's success as well as your commitment to continuing to provide quality customer service and practice high ethical standards.

#### ***DO THE RIGHT THING***

Each SKC employee has an individual responsibility to deal ethically with our customers, suppliers and fellow employees. All employees are expected to do more than merely avoid unethical conduct. Honesty also requires that employees refuse to participate either actively or passively in any cover-up of such misconduct.

#### ***RAISE CONCERNS / "RED FLAGS"***

You are expected to raise ethical concerns and report any actual or suspected ethical misconduct to your manager or Executive Management as appropriate. Misconduct may also be reported to Human Resources or SKC's General Counsel. You are encouraged to raise concerns about any issue or suspicion of a violation of SKC's Ethics Policy as soon as you are made aware of a possible violation. "Looking the other way" on potential ethical questions is in direct contradiction to SKC's commitment to honesty and integrity and is not acceptable. No employee will suffer any detriment as a result of raising genuine concerns about a violation of this policy, even if they turn out to be mistaken. Never retaliate against anyone who reports or participates in an investigation of a possible violation of this Code of Conduct.

#### ***AVOID CONFLICTS OF INTEREST***

A conflict of interest may arise any time competing loyalties could cause you to pursue a personal benefit for you, your friends, or your family at the expense of SKC or our customers. Avoid conflicts of interest and circumstances that reasonably appear to be a conflict. Sometimes a situation that previously didn't present a conflict of interest may develop into one. Your manager or SKC Executive Management can assist in determining whether a situation rises to a potential conflict of interest.

#### ***DON'T BRIBE***

Various laws prohibit bribery in different settings. Our rule is simple – don't bribe anybody, at any time, for any reason. Payments should be made by SKC to third parties only for services or products properly provided to SKC. No SKC employee should make any direct or indirect payment in the nature of a bribe or payoff to secure or maintain business or for any other purpose to any government employee or the personnel of any customer, supplier or competitor. In order to avoid even the appearance of improper payments, no payments are to be made by SKC in cash, other than documented petty cash disbursements. Cash payments may never be made to employees of competitors, suppliers, customers or government agencies. All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our expenses policy and specifically record the reason for the expenditure. Avoid the possibility that gifts,



entertainment or other business courtesies could be perceived as a bribe. SKC does not make contributions of any kind to political parties, and no charitable donations will be made for the purpose of gaining any commercial advantage.

### ***USE FAIR MARKETING AND PRICING METHODS***

SKC's policy is to comply with all competition and trade regulation laws and to use only ethical and proper methods to market SKC products. All SKC customers will be treated fairly and even-handedly, and no preferential trade terms or other treatment will be extended to any customer in violation of any law. To avoid the appearance of improper action, SKC absolutely prohibits consultations with competitors regarding prices, customers or territories.

### ***SUBCONTRACTOR STANDARD***

SKC's subcontractors are required to comply with the requirements and principles of SKC's Code of Conduct and to perform all activities associated with the supply of goods and services in compliance with all applicable laws and regulations, including those relating to environmental and health and safety.

Subcontractors are required:

- not to give or receive bribes in connection with the supply of goods or services to members of SKC
- to use reasonable endeavours to ensure that their employees, associated companies, agents or suppliers do not give or receive bribes in connection with the supply of goods or services to members of SKC

For this purpose, a "bribe" means any financial or other advantage given to:

- someone to persuade them to act improperly or to reward them for acting improperly;
- a public official to influence them in carrying out their duties.

If the subcontractor commits any material breach of this standard, any agreement in force with that subcontractor may be immediately terminated. SKC reserves the right to audit its subcontractors to ensure compliance with SKC's Code of Conduct.

### ***REQUIRED BY LAW***

SKC is committed to doing business with integrity. This means avoiding corruption of all kinds. It is the policy of SKC to comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act ("FCPA") and the local laws in every country in which we do business. SKC's Code of Conduct is intended to comply with the FCPA, and violation of this policy may result in termination and potentially criminal penalties under the FCPA.