

ZERO ZONE, INC.

Policy Statement

TRANSPARENCY IN SUPPLY CHAINS DISCLOSURE

At Zero Zone, we are strongly opposed to the use of forced, bonded, involuntary, prison or indentured labor. At Zero Zone, we are constantly evaluating our supply chain to assess various compliance risks, including those related to slavery and human trafficking. The following information describes our company's efforts to date and our future plans to eradicate slavery and human trafficking from our supply chain:

- As a supplement to our ongoing compliance training programs, we provide training for our supply chain personnel focusing specifically on slavery and human trafficking issues and ways to migrate, to the greatest extent possible, these elements from our supply chain.
- We are educating our suppliers and adopted the Zero Zone Supplier Code of Conduct, which addresses our commitment to seek out business partners who share our values and specifically prohibits our suppliers from using forced, bonded, involuntary, prison or indentured labor.
- Zero Zone's Corporate Code of Ethics requires our employees to comply with employment-related laws, including those related to wages, hours, and minimum age requirements. Our Corporate Code of Ethics and our use of the Supplier Code of Conduct are important steps in gaining supplier compliance.
- We take violations of our Codes very seriously. For example, violations of the Supplier Code may result in termination of the supplier relationship, while violations of the Corporate Code of Ethics may result in termination of employment.
- While we are not currently verifying, auditing or requiring our suppliers to certify that their products and services comply with local laws regarding slavery and human trafficking, we will continue to assess our supply chain for areas of improvement in eradicating slavery and human trafficking, and will continue to expect our suppliers and employees to do the same.

See **Supplier Code of Conduct** on following pages.

Any questions regarding Zero Zone Supplier Standards should be directed to:

John Duimstra, CFO

Zero Zone, Inc.

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North Prairie, WI 53153

Office: (262)-392-6400

Email: john.duimstra@zero-zone.com

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ZERO-ZONE.COM

CASE DIVISION
110 N OAKRIDGE DRIVE
NORTH PRAIRIE, WI 53153
Phone: 800-247-4496
Fax: 262-392-6450

SYSTEMS DIVISION
6151 140TH AVE NW
RAMSEY, MN 55303
Phone: 800-708-3735
Fax: 763-398-1998

ZERO ZONE, INC.

Supplier Code of Conduct

Zero Zone, Inc. understands that our success depends on our reputation for ethical business performance and performing our jobs honestly, diligently and with integrity, in compliance with all applicable laws and regulations. Consistent with our commitment to conduct business fairly and honestly, we seek out business partners who share in our culture, values and business practices. This Supplier Code of Conduct ("Supplier Code") is an extension of the Zero Zone, Inc. Corporate Code of Ethics "Zero Zone Code," and establishes the standards for conducting business with Zero Zone.

For the purposes of this Supplier Code, "Supplier" means any company, corporation or other entity or person that sells, or seeks to sell, goods or services to Zero Zone, including the Supplier's employees, agents, subcontractors and other sub-tier sources.

Supplier is responsible for communicating the contents of this Supplier Code of Conduct to its officers, directors, employees, agents, subcontractors and sub-tier sources who are involved in the procurement and production process related to products and services provided to Zero Zone.

COMPLIANCE WITH LAWS AND REGULATIONS

Zero Zone does business in the Americas and in some instances throughout the world. Because of Zero Zone's global presence, a Supplier must comply with all laws and regulations applicable to its business in the countries where it does business, including all laws and regulations relating to each subject matter below. The Supplier must recognize that Zero Zone's obligations and requirements extend to all countries where Zero Zone does business, and that in some cases, Zero Zone, and its suppliers, are required to conduct business in accordance with the laws of other countries in which Zero Zone operates.

CHILD LABOR AND FORCED LABOR

Supplier will not intentionally source materials from supply chains associated with human trafficking and will take reasonable efforts to assure that its own suppliers comply with this requirement. Supplier must comply with all applicable local laws with respect to child labor. In the absence of such laws or in the event existing laws permit the hiring of a person younger than 15 years of age, the minimum age for employment or work by Supplier will be 15 years of age or the age for completing compulsory education in that country, whichever is higher.

Supplier must not use forced, bonded, involuntary, prison or indentured labor.

WAGES AND WORKING HOURS

Supplier must comply with all applicable local laws with respect to wage and hour laws, including those relating to minimum wages, overtime hours, and other elements of compensation, and will provide all legally mandated benefits. Supplier will not require employees to work more than the maximum number of hours permitted under applicable laws.

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ZERO ZONE, INC.

Supplier Code of Conduct (Cont.)

FREEDOM OF ASSOCIATION

Supplier must respect workers' rights to associate freely, in compliance with existing local laws and without intimidation, reprisal or harassment. Workers' rights under local laws to join labor unions, seek representation and/or join worker's councils should be acknowledged by Supplier.

DISCRIMINATION

Supplier must not discriminate against any worker in its hiring and employment practices based on race, color, religion, disability, national origin, gender, sexual orientation, marital status, age or other characteristic protected by local law. Supplier must not discriminate against any worker based on political affiliation or union membership in its hiring and employment practices.

Supplier will not require a pregnancy test prior to employment or otherwise require workers or potential workers to undergo medical tests that could be used in a discriminatory way, except where required by applicable laws, or where prudent for workplace safety.

FAIR TREATMENT

Supplier will treat its workers with dignity and respect. Supplier will maintain a workplace free of harassment and discrimination and shall not threaten workers or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse.

HEALTH AND SAFETY

Supplier will conduct its operations in compliance with applicable health and safety laws and regulations and provide its workers with a safe and healthy work environment. Where Supplier also provides accommodations for its workers, such accommodations shall be appropriate for its location and be clean, safe and, at a minimum, meet the basic needs of its workers.

ENVIRONMENT

Supplier will comply with all applicable environmental laws, regulations and standards and minimize any adverse impact on the environment. Supplier must endeavor to conserve natural resources and energy, and reduce or eliminate waste and the use of hazardous substances.

CONFLICT MINERALS

Supplier will cooperate in due diligence requests made by Zero Zone with respect to the origin of intermediaries associated with the purchases of materials or products containing Conflict Minerals, whether or not those materials or products may have been mined or produced in the Covered Countries or obtained from recycled sources. Where specified in a purchase order or supply agreement, Supplier will comply with any Zero Zone requirement to provide products, components, parts and materials which are free of Conflict Minerals mined or produced in the Covered Countries in support of armed conflict in the region.

"Conflict Minerals" are tin (Cassiterite), tungsten (Wolframite), tantalum (Columbite-tantalite or coltan) and gold, and the derivative metals from these minerals.

The "Covered Countries" are the Democratic Republic of the Congo, Angola, Burundi, Central African Republic, The Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.

ZERO ZONE, INC.

Supplier Code of Conduct (Cont.)

FAIR DEALING AND COMPETITION LAWS

Supplier will not engage in collusive bidding, price fixing, price discrimination or other unfair trade practices in violation of applicable antitrust or competition laws. Supplier will uphold fair business standards in advertising, sales and competition.

PROTECTION OF INTELLECTUAL PROPERTY

Supplier must respect intellectual property rights, including patents, trademarks, copyrights and process designs, and safeguard Zero Zone's confidential and proprietary information. Any transfer or sharing of technology or know-how must be done in a manner that protects intellectual property rights and is in compliance with local laws, including export laws, concerning data privacy and security.

DATA PRIVACY AND SECURITY

Supplier will comply with all local laws concerning data security and privacy, and will protect and safeguard data provided by Zero Zone, which may include private and sensitive personal information. Any transfer or sharing of data must be done in a manner that protects such information from inadvertent or unauthorized disclosure and any disclosure must be in compliance with local laws.

IMPROPER PAYMENTS

Supplier is prohibited from engaging in any corruption, extortion or embezzlement, in any form. Supplier must comply with all applicable anti-corruption laws and regulations of the countries in which they operate, the U.S. Foreign Corrupt Practices Act, the UK Anti-Bribery Act, the OECD Anti-Bribery Convention and any international anti-corruption conventions. Supplier will not offer or accept bribes or employ other means to obtain an undue or improper advantage. Bribes, kickbacks, facilitating payments and similar payments to government officials or to Zero Zone employees or agents acting on Zero Zone's behalf are prohibited. Zero Zone employees are discouraged from accepting gifts or entertainment from suppliers, including gifts or entertainment of nominal value. When business meals are appropriate to further business relationships, those meals may not be extravagant in nature.

MONITORING AND RECORD KEEPING

Supplier must maintain all documentation necessary to demonstrate its compliance with this Supplier Code and provide Zero Zone with access to those documents upon Zero Zone's request for review. Neither Zero Zone nor any of its affiliates or authorized agents assumes any obligation or duty to monitor or ensure compliance with this Supplier Code. Supplier is solely responsible for compliance with this Supplier Code by its officers, directors, managers, employees, representatives and agents.

VIOLATION OF THIS SUPPLIER CODE

If a Supplier violates any of the requirements contained in this Supplier Code, Zero Zone may immediately terminate its supply relationship with that Supplier. Violations of this Supplier Code should be reported by one of the following two options:

1. Zero Zone Telephone: **1-800-247-4496**
2. Zero Zone anonymous tip line: **1-800-241-5689**