

Stanadyne LLC

Stanadyne Suppliers' Code of Conduct Guide

Introduction: Stanadyne is committed to doing business in an ethical manner and with respect for our people and the communities in which they live. We believe that this commitment will benefit our customers and other stakeholders affected by Stanadyne's activities. For many reasons, it is, quite simply, the right thing to do. We recognize, however, that Stanadyne is but one link in a supply chain to the end user that is long and global. Therefore, it is essential that our suppliers also understand and appreciate the standards of business conduct that are expected of any company that does business with Stanadyne.

This Guide identifies our expectations concerning business conduct that are essential for companies that do business with Stanadyne. We also believe that these Standards will serve to advance the performance of our companies to our mutual benefit. Therefore, compliance with Stanadyne's Supplier's Code of Conduct Guide is a mandatory component of all Stanadyne purchase contracts.

We appreciate your thorough review of the standards set forth in this Guide.

Respect for People: We expect every Stanadyne supplier to abide by all applicable employment laws. We believe every person should determine for his or herself whether employment is in his or her best interests. We believe that children should not be placed in a position of making this determination. Therefore, Stanadyne will not allow the use of labor by children under the age of sixteen unless as part of a government authorized job training or apprenticeship program that would clearly be beneficial to the individuals participating. We expect that our suppliers will not use of any forced or involuntary labor in any form, including human trafficking or physically abusive disciplinary practices.

Stanadyne also expects its suppliers to provide employee wage and benefit levels that satisfy basic needs in light of local conditions. We also expect suppliers to abide by all applicable laws related to limits on regular and overtime working hours and compensation. And, we expect our suppliers to respect freedom of association of its employees in accordance with local laws.

Safe and Positive Workplace: We believe that a diverse workforce fosters creativity and enthusiasm. We expect our suppliers to encourage a positive and diverse workplace by not tolerating harassment or discrimination, including that involving race, color, religion, sexual orientation, gender identity, national origin, protected veteran status, age or disability.

Stanadyne also expects its suppliers to provide its employees with a safe and healthy work environment and to abide by all applicable health and safety laws.

Environmental Protection and Product Content: We expect that our suppliers will abide by all local environmental laws and regulations. In addition, we believe that Stanadyne suppliers should work to minimize waste, prevent pollution, and conserve energy. We also encourage our suppliers to seek external verification concerning their environmental performance, such as through the ISO 14001 certification process. Stanadyne suppliers are expected to use materials that conform to all legal and regulatory requirements and which also satisfy Stanadyne's product content rules identified in our Supplier Quality Manual.

Stanadyne is also committed to adherence with "End of Vehicle Life" and "Registration, Evaluation, Authorization, & Restriction of Chemicals" ("REACH") requirements. Stanadyne suppliers are expected to cooperate fully with Stanadyne to satisfy these and other recycling and environmental and health protection initiatives.

Conflict Minerals and Other Product Origin Obligations: Stanadyne is committed to compliance with U.S. laws related to use of "conflict minerals". As a Stanadyne supplier, you are expected to respond to all requests for information related to product content and origin. When requested, you are expected to provide information related to product content and about country of origin.

Local and Regional legislation: Stanadyne suppliers are to follow their local and regional legislation guidelines as they continue to change throughout the life of the product they supply. Stanadyne also expects that suppliers enforce their subsequent supply chain to follow and enforce the rule of law in their respective regions in like manor. Any violation of local, regional, or country laws will not be tolerated within the total Stanadyne supply chain and any issue should be sent to review to Stanadyne as soon as it is known.

Product Safety: Stanadyne suppliers are expected to take all reasonable safety measures in connection with the design and manufacture of products it sells to Stanadyne. It is the obligation of every Stanadyne supplier to inform Stanadyne immediately if a question concerning safety of a product sold to Stanadyne arises.

Supply Chain Transparency: Supply chain transparency is required to confirm compliance to this code of conduct. To monitor this, Stanadyne along with our customer will periodically request documentation, conduct onsite audits, review and approve corrective action plans, and verify implementation of corrective action where needed.

Communication: Suppliers are expected to assist Stanadyne in enforcing this Suppliers' Code of Conduct Guide by communicating its principles to their supervisors, employees, and suppliers.

Gifts, Favors and Entertainment: Stanadyne will select its suppliers on the basis of total value, including quality, price and services offered. Therefore, suppliers should not offer gifts, favors or entertainment to Stanadyne employees that are of significant value (greater than \$100) or that are inappropriate or unbecoming to Stanadyne employees. Stanadyne employees are required to adhere to a corporate policy that prohibits them from accepting gifts and entertainment. You must not try to unfairly influence a Stanadyne employee through inappropriate gratuities. Ask your Stanadyne contract representative if any potential gift or entertainment is allowable under Stanadyne's policies. And, if a Stanadyne person solicits you for a gift or a favor, you should report that matter to Stanadyne HR.

Improper Payments: It is Stanadyne policy that bribes, kickbacks, or other improper payments may not be offered or paid directly by or on behalf of Stanadyne anywhere in the world to any officer, agent or employee of any customer, supplier, or competitor, or to a third party if you know or have reason to suspect that any part of the payment will be given or offered as a part of an improper payment. This includes, but is not limited to, payments to government officials. If you are acting on Stanadyne's behalf in any manner, you must comply with this policy. If you are performing services for Stanadyne, you may be required to certify and provide evidence of your understanding and compliance with this policy.

Negotiating Fairly and Honestly: Information which you give to Stanadyne during the course of negotiations or otherwise must be accurate. You must not attempt to improperly influence the course of negotiations through any deceptive means. You must abide by all laws and regulations that may affect our business together, including laws related to fair competition and trade practices.

Good Ethics is Good Business: As we do business together, we believe that adherence to the above principles will serve both of our companies well. If you have any questions concerning whether particular conduct related to your supply of goods or services to Stanadyne is appropriate, we invite you to bring that matter to the attention of your business contact at Stanadyne. He or she will provide assistance or will seek additional guidance as appropriate.

Questions and Concerns: If you have any questions or concerns related to any of the matters identified in this Guide, please contact your Stanadyne Purchasing representative.

Thank you for your support.

Stanadyne LLC

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