



RK SUPPLIER & EMPLOYEE ETHICS POLICY

Overview

RK Industries, LLC, and each of its subsidiaries and affiliates (collectively “RK”) is committed to ethical business practices in all interactions with our employees, customers and suppliers. Given our high standards, all suppliers, and the RK employees who work with them, are expected to conduct themselves with honesty and fairness. It is a priority for both suppliers and employees to maintain high ethical standards, adhere to all applicable laws and avoid impropriety, unfair dealings or conflicts of interest.

Who is included?

The RK Supplier and Employee Ethics Policy (the Policy) applies to all RK suppliers, vendors and subcontractors and includes all third parties doing business with RK: An individual, business, corporation, non-profit or other entity that sells, or seeks to sell, any kind of goods or services to RK. This Policy includes all employees, agents and other representatives working on behalf of our suppliers.

RK’s Commitment to Fair Business Practices for Your Success

RK is committed to strengthening our relationships with our valued suppliers. As a part of this effort, we created this Policy to ensure a level playing field and fair opportunities for all of our suppliers in their business dealings with RK.

As a Supplier, You Acknowledge and Abide by this Policy

As an RK Supplier, you are expected to acknowledge this Policy and to apply it in all interactions with RK and any of its affiliated business units as well as all individual employees and agents working on behalf of RK. This Policy only pertains to individual employees. It is not related to your potential financial or in-kind sponsorship of RK company events, such as our RK Apprenticeship Program Banquet. We appreciate your generous and continued support of our company initiatives!

Our Policy:

1. GIFTS SHALL NOT BE OFFERED BY SUPPLIERS NOR ACCEPTED BY RK EMPLOYEES

Suppliers’ Commitment

As an RK supplier, we expect you will not offer, promise or provide to any RK employee any form of kickback, favor, cash, gratuity, free rentals or equipment/tools, entertainment, events, tickets, trips, rounds of golf, hunting or fishing excursions, bottle(s) of liquor or similar, discounts or anything of value to obtain favorable treatment from RK. RK employees are similarly prohibited from soliciting such favors from you or your organization. This Policy extends to family members and friends employed by both your organization and/or RK.

Additionally, we request you contact Stephan Britz, Director of Supply Chain Management, at stephan.britz@rkindustries.com or Jon Kinning, EVP/COO, at jon.kinning@rkindustries.com if any of our employees request favors, gifts, trips, entertainment outings or other perks. You are also welcome to leave a confidential message on our Quality and Safety Hotline at 303-785-6998.

RK’s Commitment

RK employees are expected to decline any form of kickback, favor, cash, gratuity, entertainment, tickets, trips, discounts or anything of value that is made or offered by our suppliers and to notify the RK’s Director of Supply Chain Management. If an employee is given a gift, employees are instructed to either return the gift to the Supplier, or turn it over to RK’s Director of Supply Chain Management. RK employees are required to inform you of this policy in situations where warranted, and are also to inform RK’s senior leadership about any kickbacks, favors or other gifts made or offered by our suppliers.

Acceptable Perks

- Business meals or snacks, of a reasonable amount, are allowable as we recognize that many business transactions and relationships are conducted over a meal.
- Business conferences and trade shows approved by an RK Officer.
- Discounts on products and services granted by your organization are acceptable if they are part of an RK-



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approved Employee Discount Program, or if the discounts are also being offered to all other business associates.

- Small, low-value items given out at events or trade show exhibits sponsored by your organization are acceptable and include t-shirts, pens, mugs, tradeshow bags and the like.

2. SUPPLIERS SHALL AVOID ALL CONFLICTS OF INTEREST

A conflict of interest arises when the personal interests of an RK employee take precedence over RK’s ethical standards and the responsibilities of his/her position within the company. Even the appearance of a conflict of interest can be damaging to both you as a Supplier and to RK. As an RK Supplier, you agree not to enter into a financial or any other relationship with any RK employee or agent that creates any actual, potential or perceived conflict of interest for RK. Your agreement is to disclose any conflicts to RK’s Director of Supply Chain Management and eliminate them.

3. SUPPLIERS SHALL ABIDE BY FAIR AND LEGAL BUSINESS PRACTICES

As an RK Supplier, you agree not to fix prices or rig bids with our competitors. You agree not to allocate customers or markets with our competitors, or exchange current, recent, or future pricing information with our competitors. You agree to comply with all applicable anti-trust and competition laws. You agree to comply with all local, state and federal laws as well as all policies of RK. You agree to comply with all contractual requirements which flow down to you through your contracts with RK.

4. SUPPLIERS SHALL PROVIDE TOP-QUALITY PRODUCTS AND SERVICES

As an RK Supplier, you agree to supply products and services that comply in all respects with the requirements of our contracts. Including all applicable quality, safety and schedule requirements. You knowingly deliver new, top-quality products and services at competitive prices, along with excellent service to RK.

5. SUPPLIERS INTERNAL COMMUNICATION

Suppliers will communicate the RK supplier and employee ethics policy to all internal supplier staff, agents, and any party acting on behalf of the supplier with an RK employee. All parties acting for or on behalf of suppliers will abide by the terms of this policy.

Stephan Britz
VP of Supply Chain
RK Industries

On behalf of the Business Partner
Duly authorized

Print name: _____

Date: _____