



SUPPLIER CODE OF CONDUCT

Progressive Surface is committed to conducting its business in accord with applicable laws and regulations, but we strive to do more. We strive to conduct ourselves and create a work environment with strong values and the highest ethical commitments. In order to ensure compliance with our commitments, we have developed this Supplier Code of Conduct for all suppliers of Progressive. You must comply with it and to flow down this code or its principles to entities that supply goods or services to you in support of us. Progressive suppliers must commit to the following:

Legal compliance

...to comply with the laws of the applicable legal systems.

Prohibition of corruption and bribery

...to tolerate no form of and not to engage directly or indirectly in any form of corruption or bribery and not to grant, offer or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage.

Fair competition, anti-trust laws and intellectual property rights

...to act in accordance with national and international competition laws and not to participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors; to respect the intellectual property and confidentiality rights of others.

Conflicts of interest

...to avoid all conflicts of interest that may adversely influence business relationships.

Respect for the basic human rights of employees

...to promote equal opportunities for and treatment of its employees irrespective of skin color, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age;
...to respect the personal dignity, privacy and rights of each individual;
...to refuse to employ or make anyone work against his or her will;
...to refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination;

Prohibition of child labor

...to employ no workers under the minimum legal age for employment where the work is done.

Health and safety of employees

...to take responsibility for the health and safety of its employees;
...to control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases;
...to provide training and ensure that employees are educated in health and safety issues;

Environmental protection

...to act in accordance with the applicable statutory and international standards regarding environmental protection;

...to minimize environmental pollution and make continuous improvements in environmental protection;

Supply chain

...to use reasonable efforts to promote among its suppliers compliance with this Code of Conduct;

...to comply with the principles of non-discrimination with regard to supplier selection and treatment.

Conflict Minerals

...to act in accordance with applicable statutory laws and standards concerning the use of raw materials which directly or indirectly finance armed groups who violate human rights.

If you have concerns about any matter covered by this code or would like to report a suspected violation, please do not hesitate to contact the President of Progressive Surface. This can be done anonymously, if desired, and without fear of retaliation.