



GARMAT USA SUPPLIER CODE OF CONDUCT

At Garmat USA, LLC we are committed to providing the best in class equipment for the refinish/finishing industry. We accomplish this in part through partnerships with suppliers who share our commitment to quality and low cost, and who operate under a philosophy that focuses on doing the right thing.

Therefore, Garmat USA is taking upon itself to implement a supplier code of conduct that applies to businesses that provide products and services to Garmat USA, LLC.

1. **Anti-bribery and Corruption:** Garmat USA strictly prohibits the use bribery to obtain a business advantage. Bribery can include but is not limited to the transfer of anything of value, including but not exclusive to – payments of money, lavish entertainment, travel expenses, the promise of future job opportunity, or political/charitable donations.
2. **We believe and support Fair Competition.** Garmat USA aggressively competes for business but always plays within the rules. We believe we obtain business because our products are the best, and we do not mislead others or compromise our integrity to gain a business advantage. We compete fairly and honestly, and we ask that our suppliers do the same thing.
3. **Garmat USA supports internationally recognized human rights and we comply with all applicable laws regarding the treatment of our employees and other stakeholders. We insist our suppliers uphold these principles.**
4. **Suppliers that do business with Garmat USA are prohibited from using forced labor, including slave, involuntary, or child labor.**
5. **Suppliers that work with Garmat USA must comply with labor laws including those related to hiring, wages, overtime and working conditions.**
6. **Garmat USA supports Diversity and Inclusion.** We recognize that valuing differences brings superior results. Innovation flourishes when you bring different races, genders and cultures together. Garmat USA expects its suppliers to be inclusive and that their employees are treated with dignity and respect.
7. **Garmat USA supports the right to freedom of association, to bargain collectively and all other work place rights of employees and those rights must be respected by suppliers.**
8. **Avoid Conflict of Interest.** Suppliers must do business in a way that is open, transparent and with high integrity. There is a potential for conflict of interest if a supplier has a family member or close friend that works in relation to Garmat USA, its major customers, or distribution team. These relationships must be disclosed before entering negotiations with Garmat USA.
9. **Suppliers must comply with all applicable laws regarding working conditions, this includes employee health, safety, sanitation, fire safety, and risk protection, including but not limited to electrical, mechanical and structural safety. Garmat USA asks that all suppliers meet our commitment to safety and wellbeing for their employees.**
10. **At times suppliers will be made aware of Garmat USA trade and proprietary secrets. We ask that all suppliers avoid transmitting sensitive information to others without written permission from Garmat USA. This information may include sensitive employee information, strategic initiatives, proprietary knowledge, costing and or trade secrets. At the end of a supplier relationship any and all Garmat USA intellectual property must be returned to Garmat USA.**
11. **Garmat USA is committed to protecting the privacy and personal data of Garmat USA employees and customers. We ask that our suppliers do the same.**
12. **As Garmat USA Industry reach grows so does our impact and our commitment to respect the environment. We will strive to bring forth innovations that drive continual improvements of environmental compliance.**

The code of conduct is only as good the enforcement. Suppliers must take necessary steps to ensure their employees, understand and comply with the code. Including communicating, the details of the code to employees annually in the local business language. Suppliers must ensure that its subcontractors who work with Garmat related business are aware of the and comply with the code.

Garmat USA may ask to audit, and review company documentation. If a supplier is found to violate this code the supplier may be asked to submit a corrective action within 30 days and submit the steps to correct.

Garmat USA reserves the right to terminate the agreement with suppliers for non- compliance at any time.

DATED: 03/15/2019

Acknowledgement

Signature: _____

Date:_____