



## CODE OF CONDUCT

### Code of Conduct Policy

**Ball Pro, Inc. and its division, Diversified Quality Kitchenware** (“Company”), is committed to providing its clients with products of the highest quality – this includes not only the quality of the end product, but also the quality of the processes used to produce the final product, encompassing the labor invested in the product, the work environment in which the product was manufactured, and the environmental impact of its production. To this end, we have adopted standards for quality and integrity of our products as well as ethical and socially responsible production of our products both in the United States and abroad.

### Code of Conduct Standards

**Legal Compliance** - All laws and regulations in the country of business and manufacture shall be complied with; this includes legislation on product quality, product safety, labor and employment, health and safety, supply chain security, and the environment.

**Product Safety** - We will comply with all applicable laws and regulations regarding safety of products we sell. We will meet applicable recognized voluntary industry standards for our products and processes.

#### **No Abuse of Labor**

We will not use any form of forced labor, including indentured, prison, bonded or slave labor. We will not use physical or verbal harassment or abuse to discipline employees.

**No Child Labor** - We will not use child labor. We will comply with all minimum age provisions of applicable laws and regulations.

**Freedom of Association** - We respect the rights of employees to associate or organize without fear of reprisal or interference. If employees are represented by an organization recognized under law, we respect the right to bargain collectively.

**No Discrimination** - We will not discriminate in hiring and employment practices on the basis of age, nationality, race, religion, social or ethnic orientation, gender, sexual orientation or disability.

**Hours and Wages** - We will comply with all applicable wage, work hours, hiring, benefits, and overtime laws and regulations. In the absence of law in a particular location relating to product safety, labor, employment, environment or working conditions, the spirit and intent of these policies shall be met.

**Workplace Conditions** - We will provide a safe, healthy and secure workplace. We will abide by all applicable laws and regulations for safety and health. Proper sanitation, lighting, ventilation and fire safety protection will be provided.

**Environment** - We abide by all applicable environmental laws and regulations. We will manage our environmental footprint to minimize the adverse impact on the environment. We will manage our energy, water and waste systems for maximum efficiency and minimal adverse impact on the environment.

**Subcontractors and Sources** - We require all businesses that support our business as subcontractors, manufacturers or sources of goods to comply with all of the same policies stated in our Code of Conduct policy. All subcontractors and vendors are required to comply with all applicable and national laws. We expect those businesses to develop and implement internal business procedures to ensure compliance with our policy.

\* \* \* \* \*