

Reminder: Snap-on Incorporated
Code of Business Conduct and Ethics

Please be reminded that Snap-on has a Code of Business Conduct and Ethics which can be found at <http://www1.snapon.com/corporate/codeofconduct.nws>. The Code should be reviewed from time to time for your own, as well as Snap-on's, benefit. As stated in the "Avoidance of Conflicts of Interest" section of the Code, we are expected to be aboveboard, evenhanded, fair and consistent in our dealings with fellow associates, suppliers of goods and services, customers, and others with whom we do business.

Avoidance of Conflicts of Interest

- You must avoid conflicts between your personal interests and the interests of the Company.
- You must disclose any activities, financial interests or relationships that may present an actual or potential conflict of interest.
- You must deal with all suppliers, customers, competitors and all other persons doing business with the Company in a fair and objective manner without favor or preference based upon personal financial considerations.
- You must not accept from or provide to any supplier, customer or competitor any gift, entertainment or other benefit, including payments or loans, except as expressly permitted under this Code.
 - Snap-on policy does not prohibit gifts of nominal value (under \$50). Normal business meals and entertainment (such as attendance at sporting or cultural events), and similar customary and reasonable expenditures to promote general business goodwill are also acceptable even if their value exceeds \$50, so long as the associate is accompanied by the host.
- You must not own any financial interest in or hold any employment or managerial position with any company that is a competitor, supplier, or a customer of, or that does or seeks to do business with the Company, if that interest or position might influence any decision in the performance of your duties.
- You must not seek or accept, or offer or give, any payments, fees, loans, services or gifts from or to any person or firm as a condition or result of doing business with the Company.
- Your loyalty should be to the Company.

If you have questions about a business or outside activity, please talk about them with your supervisor or the Company's Legal Department.