



## **Supplier Code of Business Conduct**

Since 1920, Snap-on has focused on serving our customers, associates, investors, franchisees, suppliers and the communities where we do business. Guided by our core beliefs and values as laid out in our “Who We Are” statement, Snap-on’s commitments to integrity and social responsibility extend to its worldwide supply base. To ensure that Snap-on’s suppliers, regardless of location, conduct business to our standards, all must adhere to this Supplier Code of Business Conduct.

1. Suppliers are expected to protect employees’ workplace health and safety, human rights, and environment. Suppliers who provide residential facilities for their employees must also provide safe and healthy facilities. We expect suppliers to be law abiding, complying with all applicable environmental, health and safety laws and regulations in the countries in which they operate.
2. Suppliers will not engage in, or support the use of child labor, complying with all applicable local child labor laws and employing only workers who meet the applicable minimum legal age requirement for their location.
3. Suppliers will not engage in or support the use of forced or involuntary labor.
4. Snap-on values diversity in its workforce and fosters an appreciation of the different cultural values of its constituencies. Suppliers are expected to comply with all applicable local laws limiting discrimination in hiring and employment practices for any reason.
5. Suppliers will treat their employees with dignity and respect, and not allow or overlook any form of harassment, complying with all applicable local laws.
6. Suppliers are expected to comply with all applicable local wages, benefit, and working hours labor laws.
7. Suppliers must not offer or give, any payments, fees, loans, services or gifts to any Snap-on associate as a condition or result of doing business with Snap-on. 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. Suppliers are expected to report any potential solicitation of a kick-back from any Snap-on associate to Snap-on’s Business Ethics Help Line at 866-468-6657 or to Snap-on’s Vice President, General Counsel and Secretary at: P.O. Box 1410, Kenosha, WI USA, 53141-1410.
8. Suppliers are expected to comply with all applicable treaties, agreements, laws and regulations governing the protection, use and disclosure of intellectual property, proprietary, confidential and personal information.
9. Suppliers are expected to comply with all other applicable national and international laws and regulations.
10. Suppliers using sub-contractors to provide goods and services to Snap-on will also be responsible for the sub-contracted party for compliance with this Code of Conduct.
11. Snap-on reserves the right to monitor Supplier compliance with this code of conduct. In the case of non-conformance, Snap-on expects the supplier to put clear and trustworthy action plans in place to comply with the code. While we commit to work with suppliers to improve workplace conditions, we maintain the right to terminate our relationship, without liability to Snap-on, with suppliers that have repeated violations or refuse to rectify deficiencies.

This code applies to all Snap-on Incorporated worldwide companies, subsidiaries and joint ventures.

P.O. Box 1410 • Kenosha, WI 53141-1410 •

## Who We Are

### OUR MISSION

The most valued productivity solutions in the world

#### BELIEFS

**We deeply believe in:**

Non-negotiable Product and Workplace Safety  
Uncompromising Quality  
Passionate Customer Care  
Fearless Innovation  
Rapid Continuous Improvement

#### VALUES

**Our behaviors define our success:**

We demonstrate Integrity.  
We tell the Truth.  
We respect the Individual.  
We promote Teamwork.  
We Listen.

#### VISION

**To be acknowledged as the:**

Brands of Choice  
Employer of Choice  
Franchisor of Choice  
Business Partner of Choice  
Investment of Choice