

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.

- 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 including race, religion, color, national origin, sex, age, physical or mental disability, veteran status or sexual orientation.
- 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 kickback 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: 2801 80th Street, Kenosha, WI 53143.
- 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 subcontractors to provide goods and services to Snap-on will also be responsible for the subcontracted party for compliance with this Supplier Code of Business Conduct.
- 11. Snap-on reserves the right to monitor Supplier compliance with this code of conduct. In the case of nonconformance, 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 Supplier Code of Business Conduct applies to all Snap-on worldwide companies, subsidiaries and joint ventures.

2801 80th Street• Kenosha, WI 53143



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