



Ethical Purchasing and Forced Labor Policy

Nexteer believes in ethical purchasing and will not knowingly use suppliers who fail to abide by Nexteer Supplier Requirements, supply unsafe products or services, violate applicable labor or employment laws, use child or forced labor or use physical punishment to discipline their employees.

Nexteer supports the elimination of all forms of forced or compulsory labor. Forced or compulsory labor is work or service which is exacted from a person under the threat of penalty and for which that person has not offered them self voluntarily. Nexteer prohibits the use of forced or compulsory labor, as defined above, including prison, indentured, bonded or otherwise, in any Nexteer operation and in any level of the supply chain.

From time to time, certain prison systems worldwide may solicit Nexteer participation in voluntary prisoner training, rehabilitation, and/or skills enhancement efforts. Programs of this type that meet certain specified criteria, set forth below, do not constitute forced or compulsory labor, and Nexteer participation under those circumstances would not violate this policy. In order to assure that inadvertent violations of this policy do not occur, Nexteer participation in any program of this type must be approved in advance by both the President of Nexteer and the Head of Global Supply Management, or their designees. Approval is contingent upon meeting all the following requirements.

1. All work must be performed on a voluntary basis.
2. Working conditions must comply with applicable laws, including occupational, health, and safety laws.
3. Workers must be paid at a rate comparable to similar prison programs or operations, with reasonable administrative fees payable to the prison system or appropriate entity.
4. The Nexteer location participating in the program is responsible for monitoring compliance with these criteria on an annual basis, with findings reported to the Head of Global Supply Management.

Nexteer expects every supplier to comply with our prohibition of the use of any form of forced labor, and every other provision of their contracts with Nexteer. This includes the obligation by Nexteer's supplier, to ensure all suppliers in their supply chain also comply with these prohibitions. We will regard the use of forced labor as a material breach of the Nexteer General Terms & Conditions that could lead to termination of any existing contracts or purchase orders. Any concerns or questions, should be directed to the Nexteer buyer. If you believe this policy has been violated in any way, please contact Nexteer's Ethics Line by phone at 1-855-405-4744 or online at www.nexteer.ethicspoint.com.