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## VENDOR CODE OF CONDUCT

Hillman vendors are expected to comply with all applicable local, country, and international laws regarding environmental, occupational safety and health, transportation, labor and human resource practices, and material content for supplied materials. Vendors will maintain compliance systems and be able to demonstrate a satisfactory record of compliance with laws and regulations in the conduct of their business.

Vendors are expected to supply materials to Hillman that are “DRC conflict-free.” “DRC conflict-free” means (1) any “conflict minerals” (i.e. tin, tantalum, tungsten and gold (collectively the “3TGs)) necessary to the functionality or production of supplied materials do not directly or indirectly finance armed groups through mining or mineral trading in the Democratic Republic of Congo or an adjoining country, or (2) any 3TGs in supplied materials are from recycled or scrap sources. Vendors are expected to adopt policies and management systems with respect to conflict minerals and to require their suppliers to adopt similar policies and systems.

Hillman encourages its vendors to support the Conflict Free Sourcing Initiative (CFSI) Program by continuously monitoring the CFSI list of conflict free smelters and to only source from such smelters. This list can be found at [www.conflictreesmelter.org](http://www.conflictreesmelter.org).