

# **Polar Corporation**

## **Code of Conduct**

### **Compliance with Laws**

Polar Corporation maintains full compliance with all Local, State and Federal laws and regulations applicable to the operation of our manufacturing business and facility.

### **Quality and Environmental Health and Safety**

Polar Corporation products and services are designed, produced and delivered with the utmost consideration for the safety and health of our employees and consumers. We maintain quality assurance processes to detect, communicate with our customers and correct defects to ensure delivery of products and services that meet or exceed contractual quality, legal and regulatory requirements. All required inspection and testing operations are completed properly by appropriately authorized and qualified individuals, and any required certifications are completed accurately.

Our operations are conducted in a manner that safeguards the environment, minimizes waste, emissions, energy consumption, and the use of materials of concern. These are performed to assure a safe and healthy work environment for our employees and the public alike.

### **Competition on the Merits and Fair Play**

Polar Corporation competes strictly on the basis of the merits of our products and services.

Accordingly, we will never offer, promise, authorize, or provide, directly or indirectly, anything of value (including business gifts or courtesies) with the intent or effect of inducing anyone to forego their duties and loyalties to provide unfair business advantage to Polar Corporation, its customers or others.

Polar Corporation will not engage in any anti-competitive conduct for any reason whatsoever. We will never rig bids, fix prices, or allocate customers or markets, or exchange our own or our customer's competitively sensitive information with any competitors. We will also refrain from abusing our market power, by refusing to deal, engaging in predatory or discriminatory pricing practices, conditioning the sale or provision of a particular product or service with that of another product or service, or undertaking similar abusive tactics.

We will not engage in other deceptive or unfair market practices, whether on our own or our customer's behalf, or on the behalf of others. We will never make misrepresentations regarding our customer's products or services, our products or services, or the products or services of others. Similarly, we will never denigrate any competitors of ours or those of our customers.

## **Conflict of Interest**

Polar Corporation will avoid all conflicts of interest or situations giving the appearance of a conflict of interest in our dealings with our customers. We will report to our customer any instances involving actual or apparent conflicts of interest between our interests and theirs, including any personal relationships that may exist between persons that may have an impact on our business.

## **International Trade Compliance**

Polar Corporation will conduct business in strict compliance with all applicable laws and regulations governing (a) the export, re-export and retransfer of goods, technical data, software and services; (b) import of goods; (c) economic sanctions and embargoes; and (d) U.S. antiboycott requirements.

## **Government Procurement**

Polar Corporation will take special care to comply with the unique and special rules that apply to contracting with the U.S. Government. If we support a customer contract with the U.S. Government, we will follow the U.S. Government's rules for competing fairly, honor restrictions applying to U.S. Government employees (e.g., receipt of gifts and employment), deliver products and services that conform to specifications, laws and regulations, adhere to government accounting and pricing requirements, claim only allowable costs, ensure the accuracy of data submitted and comply with all other applicable U.S. Government requirements.

## **Information Protection**

Polar Corporation will respect the legitimate proprietary rights and intellectual property rights of our customers and others. We will take proper care to protect sensitive information, including confidential, proprietary and personal information. We will not use such information for any purpose other than the business purpose for which it was provided, unless the owner of the information provided prior authorization.

## **Accuracy of Records and Submissions**

Polar Corporation will maintain books and records that accurately and completely reflect all transactions related to our customer's business and each of our submissions to our ~~customers, their customers, and regulatory authorities.~~ Polar Corporation will never make any entry in our books or records to alter, conceal, or destroy any document to misrepresent any fact, circumstance, or transaction related to our customer's business.

## **Non-Discrimination**

Polar Corporation will treat our existing and prospective employees and business partners fairly, based only on merit and other factors related to our legitimate business interests, and without regard to race, religion, color, age, gender, gender identity or expression, sexual orientation, national origin, marital status, veteran status or disability.

## **Child Labor/Human Trafficking**

Polar Corporation will ensure that child labor is not used in the performance of our work. (The term “child” refers to any person under the minimum legal age for employment where the work is performed.) We will also comply with Laws prohibiting human trafficking.

## **Anonymous Reporting and Reporting Misconduct**

Polar Corporation employees are encouraged to report any questionable legal or ethical matters or concerns including any violations of this Code by anyone affiliated with our business or its business partners, customers or suppliers without fear of retaliation. You should notify your **Department Supervisor; General Foreman or General Manager**. There are also opportunities for anonymous reporting by contacting Polar Corporations’ **Ombudsman; ombudsman@polarcorporation.com**. Polar Corporation will promptly investigate reports of legal or ethical issues or concerns.

## **Ethics & Compliance Program**

Polar Corporation has systems in place that (a) ensure compliance with applicable laws, regulations and the requirements set forth in this Code; (b) promote an awareness of and commitment to ethical business practices, including, without limitation, the expectations set forth in this Code; (c) facilitate the timely discovery, investigation, disclosure and implementation of corrective actions for violations of law, regulations or the expectations set forth in this Code and (d) provide training to our employees on compliance requirements, including the expectations set forth in this Code.

Polar Corporation will carefully select our business partners, and perform due diligence, audit, and oversight to prevent and detect misconduct. We will flow down the principles set forth in this Code to these business partners.

## **Code Compliance**

Polar Corporation will permit our customers and/or its representatives to assess our compliance with the expectations set forth in this Code, including on-site inspection of facilities and review of associated books, records and other documentation. We will also provide, upon request, additional information and certifications evidencing compliance.

Polar Corporation will ensure that its customers have the right to assess our business partners’ ~~compliance with the expectations set forth in this Code in performance of their~~ work, including on-site inspection of facilities and review of associated books, records and other documentation. We will ensure that our business partners will provide our customers, upon request, additional information and certifications evidencing compliance.

In the event of any wrong doing, Polar Corporation will fully cooperate with any related investigation conducted by our customers. We will ensure that our business partners also fully cooperate if such investigation involves their performance.

Polar Corporation and its business partners will correct any non-conformances identified during assessments and acknowledge and agree that we are solely responsible for full compliance with this Code by our directors, officers, employees, representatives and business partners.