

NSI and Suppliers Sustainability Policy and Code of Conduct

Revision: 06.28.12

- (1) **Human Rights.** Northern Stamping respects and supports compliance with internationally-accepted human rights policies:
 - (a) **Forced Labor.** Northern Stamping condemns all forms of forced and compulsory labor. Suppliers will not use forced or involuntary labor, whether bonded, prison or indentured, including debt servitude.
 - (b) **Child Labor.** Northern Stamping supports the effective abolition of exploitative child labor. Suppliers will not employ individuals in violation of local mandatory school age or under the legal employment age in each country where they operate. In no case will Supplier employ non-family workers under the age of 15.
 - (c) **Harassment and Discrimination.** Suppliers will uphold equal opportunities with respect to employment and will refrain from discrimination in any form, unless national law expressly provides for selection according to specific criteria. Discrimination against employees based on gender, race, disability, origin, religion, age or sexual orientation is not acceptable.
 - (d) **Freedom of Association.** Suppliers will respect the right of all workers and all employers to form and join groups for the promotion and defense of their occupational interests. During organization campaigns, the Supplier's management will remain neutral; and the trade unions and the Supplier's management will comply with basic democratic principles, ensuring the employees' ability to make a free decision.
- (2) **Working Conditions.** Northern Stamping is opposed to all exploitative working conditions:
 - (a) **Protection of Health and Safety.** Suppliers will ensure health and safety in the workplace to a level no less than required by national legislation, and support the continual improvement of working conditions.
 - (b) **Compensation.** Suppliers will honor the right to reasonable compensation of a level no less than the legally-established minimum wage and the local job market, based on local laws and regulations. Within the scope of national legislation, seller will respect the principle of "equal pay for work of equal value."
 - (c) **Working hours.** Suppliers will comply with national provisions and agreements regarding working hours and regular, paid holidays.
- (3) **Environment.** Northern Stamping expects stewardship of natural resources:
 - (a) Northern Stamping supports a precautionary approach to environmental challenges, and participates in and encourages initiatives to promote greater environmental responsibility. Northern Stamping encourages the development and diffusion of environmentally-friendly technologies.
 - (b) Suppliers will comply with all applicable environmental laws and regulations, and will promptly develop and implement plans or programs to correct any non-compliant practices.
- (4) **Corruption and Ethics.** Northern Stamping works against corruption in all its forms, including extortion and bribery.
 - (a) As detailed in the *Northern Stamping Code of Business Conduct*, Northern Stamping will not offer or take receipt of any gift, loan, fee, reward or other advantage to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust, in the conduct of the enterprise's business, even in areas where it may be tolerated.
 - (b) Northern Stamping strictly adheres to all local and applicable U.S. laws and regulations, including the Foreign Corrupt Practices Act, and requires its Suppliers to act in a similar manner.
 - (c) Northern Stamping expects business decisions to be made in the best interest of Northern Stamping. Any situation that creates or appears to create a conflict between personal interests and the interests of Northern Stamping must be avoided.
- (5) **Suppliers.** Northern Stamping expects its Suppliers to introduce and implement equivalent principles in their own companies and their own supply chains.
 - (a) Suppliers will train their employees regularly on these principles, and they must incorporate them as a basis for relations with Northern Stamping.
 - (b) Suppliers must comply with all applicable laws and regulations, which include national and local laws, rules, codes and regulations as well as applicable treaties. Northern Stamping strongly encourages any Supplier



NSI and Suppliers Sustainability Policy and Code of Conduct

Revision: 06.28.12

who feels pressured to violate the law or any provision of this document by a Northern Stamping employee to contact Northern Stamping's Customer Representative immediately at (216) 469-9072.