

Rexnord Corporation
Supplier Code of Conduct

Rexnord Corporation (“Rexnord”) is committed to fostering ethical, safe and respectful business practices throughout its operations, including its supply chain. In that regard, we expect our suppliers (“Supplier”) to provide employees with safe working conditions, to treat employees fairly and with dignity, and to be respectful of the environment with regard to manufacturing processes.

GENERAL

Supplier shall comply with all laws and regulations that apply to its business. In addition, Rexnord expects Supplier to comply with the principles set forth in this Supplier Code of Conduct (the “Code”). Adherence to the Code will be included in Rexnord’s supplier evaluation, and failure by the Supplier to do so could serve as grounds for disqualification as a Rexnord supplier.

ETHICS, INTEGRITY AND COMPLIANCE

Supplier is committed to the highest standards of integrity in conducting its business; including:

- Corruption, Embezzlement, Improper Advantage. Supplier shall not, directly or indirectly, offer or accept bribes or kickbacks, or any other improper payments or gifts. Supplier shall be in compliance with all anti-corruption laws in the jurisdictions in which it operates. Supplier shall not engage in any criminal activity, including extortion, embezzlement or money laundering.
- Competition. Supplier shall adhere to standards of fair business and competition and comply with the competition laws of the United States, the European Union and other applicable countries.
- Accounting Records. Supplier’s accounting records shall be kept in accordance with the laws of the applicable jurisdiction; shall be in sufficient detail, accurately and fairly reflecting the transactions, assets, liabilities, revenues and expenses; and shall not contain any false or misleading information.
- Export and Import Documentation. Supplier shall provide all import or export documents requested by Rexnord. All country of origin and other certifications issued by Supplier to the Rexnord shall be true and accurate and in the detail requested by the Company.
- Conflict Minerals. Supplier shall support Rexnord in its efforts to comply with the conflict minerals rules under the United States Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 and related regulation that require Rexnord to provide information regarding the presence of conflict minerals in its products. Accordingly, Supplier acknowledges that it has received and read Rexnord’s policy on conflict minerals; that its policy on this issue is at least as stringent as Rexnord’s; and agrees to comply with any contractual provisions that Rexnord has with Supplier.
- Conflicts of Interest. Supplier shall avoid conflicts of interest and shall immediately report to Rexnord any conflict of interest of which it becomes aware.

LABOR AND HUMAN RIGHTS

- Compensation and Hours of Work. Supplier shall comply with all applicable wage and hour laws and regulations, including those relating to minimum wage, overtime and other items of compensation and provide all legally mandated social benefits. Rexnord expects the Supplier, even in the absence of wage and hours laws, to fairly compensate its employees and to follow a reasonable hours worked policy.
- Forced Labor/ Human Trafficking. Supplier shall not use forced or involuntary labor or engage in any form of human trafficking.
- Child Labor. Supplier shall not use any person who is under the minimum working age of the jurisdictions in which it does business or 15 years, whichever is older. Supplier shall comply with all applicable laws and regulations regarding the employment of minors.
- Human Rights Abuses. Supplier shall not engage in or support any actions that abuse human rights as set forth in the United Nations Universal Declaration of Human Rights, including discrimination, freedom of association, coercion, harassment or abuse.

ENVIRONMENTAL, HEALTH AND SAFETY

- Workplace Safety and Emergency Planning. Supplier shall provide a safe and healthy workplace. At a minimum Supplier shall meet the rules and regulations that apply to its business. Supplier should also take reasonable measures to minimize the risk of injuries and illness in its workplaces.
- Environmental Protection. Supplier shall comply with the environmental regulations in the jurisdictions in which it does business and should seek ways to conserve natural resources and energy, reduce waste and the use of hazardous substances, and minimize adverse impacts on the environment.

MANGEMENT SYSTEMS, MONITORING COMPLIANCE AND REPORTING

- Management System and Communication. Supplier should maintain a system reasonably designed to ensure compliance with this Code. Supplier shall ensure that this Code is communicated to its officers, directors, employees, representatives and agents, as appropriate, and flowed down to its subcontractors and suppliers.
- Monitoring and Compliance. Supplier shall maintain all documentation necessary to demonstrate its compliance with this Code and shall, upon request, provide Rexnord reasonable access to such documentation and its facilities to allow Rexnord to confirm Supplier's compliance with this Code. However, Supplier understands that Rexnord is not assuming monitoring responsibilities and that Supplier is fully responsible for compliance.