

## CODE of CONDUCT & BUSINESS ETHICS

Precision Coil and Rotor, operating as a division of Jay Industrial Repair, Inc., is committed to the following business standards as stated in the Code of Conduct for Jay Industrial Repair, Inc.

It is the policy of Jay Industrial Repair to provide our Code of Conduct and Business Ethics, which will serve as a guide to proper conduct for all employees. We expect all employees to observe the highest standards of ethics and integrity in their conduct. This means following a basic code of ethical behavior that includes:

### ***Equal Employment Opportunity Policy***

Jay Industrial Repair is an Equal Opportunity Employer and prohibits discrimination and harassment of any kind. Jay Industrial Repair is committed to the principle of equal employment opportunity for all employees and to providing employees with a work environment free of discrimination and harassment. All employment decisions at Jay Industrial Repair are based on business needs, job requirements, and individual qualifications, without regard to race, color, gender, religion, national origin, age, disability, genetic information, veteran status, or any other classification protected by federal, state or local law.

Jay Industrial Repair will not permit intimidation, harassment, or retaliation against any individual who reports a potential violation of this policy, assists or participates in an investigation under this policy, or opposes harassment prohibited by the policy.

### ***Respect for the Individual***

We all deserve to work in an environment where we are treated with dignity and respect. Jay Industrial Repair is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone's talents go to waste.

Jay Industrial Repair is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive, or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her immediate supervisor or to Human Resources

### ***Uphold the Law***

Jay Industrial Repair's commitment to integrity begins with complying with laws, rules, and regulations where we do business. Further, each of us must understand the company policies, laws, rules, and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or Jay Industrial Repair policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

### ***Build Trust and Credibility***

The success of our business is dependent on the trust and confidence we earn from our employees and customers. We gain credibility by adhering to our commitments, displaying honesty and integrity, and reaching company goals solely through honorable conduct. It is easy to say what we must do, but the proof is in our actions. Ultimately, we will be judged on what we do.

When considering any action, it is wise to ask: will this build trust and credibility for Jay Industrial Repair? Will it help create a working environment in which Jay Industrial Repair can succeed over the long term? Is the commitment I am making one I can follow through with? The only way we will maximize trust and credibility is by answering "yes" to those questions and by working every day to build our trust and credibility.

### ***Commitment to Safety***

Jay Industrial Repair is committed to providing a safe environment not only for employees, but also for any visitors to our locations. By working to constantly train our workforce, improve our processes, and implement best practices, we strive to have an injury-free workplace.

### ***Safety and Health Policy***

Jay Industrial Repair regards the safety, welfare, and health of its employees as the highest priority. Safety is a full-time responsibility of everyone at Jay Industrial Repair.

All employees are expected to:

- Comply with all applicable federal, state, or local safety regulations in the performance of their duties.
- Participate in the safety orientation, be familiar with and comply with all safety guidelines of Jay Industrial Repair.
- Participate in safety meetings and training sessions.
- Understand OSHA requirements and work in accordance with these standards.
- Maintain safe and healthy working conditions.
- Adhere to safe operating practices and procedures designed to prevent injury and illness.
- Cease any operation immediately if there is eminent danger to anyone.
- Report any unsafe conditions or potential hazards to immediate supervisor or Corporate Compliance Manager.

Complete safety policy manuals are available at each Jay Industrial Repair location and provide additional information on the Jay Industrial Repair Safety Program. This program includes details on the workers' right to know about hazardous materials that may be present in Jay Industrial Repair operations. Each employee is expected to know that Safety Data Sheets (SDS) on any such materials are available for review at any time at each Jay Industrial Repair location.

Jay Industrial Repair will conduct periodic internal safety audits at each location. In addition, external audits may also be conducted by third party companies.

Employees must bring any safety issues or concerns to their safety representative, foreman, supervisor, or any other member of management. Employees who fail to adhere to this policy will be disciplined according to the terms set forth in this handbook.

### ***PRECISION COIL and ROTOR, Code of Conduct and Supplier Code of Conduct***

As a provider of manufactured goods to customers worldwide, Precision Coil and Rotor has implemented the following in addition to our corporate policy.

#### **Precision Coil and Rotor Supplier Code of Conduct –**

This Code of Conduct defines the basic requirements placed on Suppliers for Precision Coil and Rotor, to include suppliers, contractors, and consultants (collectively herein referenced as "Suppliers") and their responsibility to comply with applicable and controlling laws, rules, and regulations (collectively herein referenced as "applicable laws") and at a minimum, with standards of business conduct consistent with those set forth in this Supplier

Code of Conduct (“Code”). It is Precision’s expectation that Suppliers, their employees, sub-suppliers and any other parties involved, similarly comply with the applicable laws and the standards set forth in this Code.

Precision Coil and Rotor expects the following from all its Suppliers:

#### **HUMAN RIGHTS AND LABOR STANDARDS**

- Forced Labor, Human Trafficking and Slavery – Supplier shall not use any form of forced labor including prison, indentured, bonded, military, slave or any other forms of forced labor. Supplier shall not participate in the recruitment, transportation, transfer, harboring or receipt of any persons by means of threat, use of force, or any other forms of coercion, abduction, fraud, deception, abuse of power or position of vulnerability, or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation. Suppliers shall not retain an employees’ government-issued identification, passports or work permits as a condition of employment and shall allow employees to resign from their positions at anytime.
- Child Labor – Supplier shall ensure that no underage labor has been used in the production or distribution of their goods or services. Employees must not be younger than the minimum employment age established by the respective country or local jurisdiction. In the event no minimum employment age is established, employees must not be younger than the age of compulsory education; or if no minimum age for compulsory education is established, employees should not be younger than age 15.
- Working Hours/Wages and Benefits – Supplier’s employee working hours must be in compliance with all applicable laws and regulations. Suppliers must have a system in place to verify and accurately record payroll, deductions and the hours worked by legally authorized employees. Suppliers must comply with all applicable wage and compensation requirements as defined under applicable labor laws for regular work, overtime, maximum hours, piece rates, and other elements of compensation and employee benefits.
- Freedom of Association and Collective Bargaining – Supplier must adhere to applicable laws regarding the right to affiliate with lawful organizations without interference.
- Nondiscrimination – Employment by Supplier shall be based solely on person’s ability and not personal characteristics. Supplier shall maintain a workplace free of unlawful discrimination, which includes, but is not limited to, race, gender, sexual orientation, age, pregnancy, caste, disability, union membership, ethnicity, religious belief or any other factors protected by applicable law. Employees shall not be subject to verbal, physical, sexual or psychological abuse or any other form of mental or physical coercion and shall be treated with respect and dignity.
- Conflict Minerals – Supplier must make reasonable efforts to avoid in its products the use of raw materials which directly or indirectly finance armed groups who violate human rights. Direct suppliers are required to source certain minerals from processors whose due diligence practices have been validated by an independent third party audit program.

#### **HEALTH AND SAFETY**

- Working Environment – Suppliers shall provide safe and healthy working environments to prevent accidents and injury to health. Suppliers shall minimize employee exposure to potential safety hazards by identifying, assessing and minimizing risks by developing and implementing plans and procedures. Suppliers will provide training and ensure that employees are educated in health and safety issues and set up or use a reasonable occupational health & safety management system.

#### **ENVIRONMENT**

- Environmental Impact – Suppliers shall be sensitive to its impact on the environment (including but not limited to air emissions, water discharge, toxic substances and hazardous waste disposal). Supplier must act in accordance with the applicable statutory and international standards regarding environmental protection. Suppliers must use care in handling hazardous materials or operating processes or equipment that use hazardous materials to prevent unplanned releases into the workplace or the environment.

### **BRIBERY AND CORRUPTION**

- Anti-Bribery and Anti-Corruption – Suppliers shall not engage in any form of corrupt practices including without limitation to, extortion, fraud, impersonation, false declarations, bribery, money laundering, supporting or involved with terrorist or organized crime organizations or activities. Suppliers shall not offer bribes, kickbacks, illegal political contributions or other improper payments to Precision Coil and Rotor representative or agency, any customer, government official or third party, with the intention of obtaining or retaining a business or other improper advantage. Suppliers must have a written anti- corruption / anti-bribery policy that includes an annual review with its employees of such policy.

***Precision Coil and Rotor as a company will practice due diligence to ensure suppliers are complying with the principles outlined in the Supplier Code of Conduct.***