

Supplier Code of Conduct

Introduction:

This Supplier Code of Conduct, while not all inclusive, is established to serve as a guideline of expectations, highlighting some key laws and regulations, as well as outlining requirements that Champlain expects its suppliers to meet. Suppliers must take reasonable measures to ensure that their suppliers and sub-contractors act in accordance with this Supplier Code of Conduct.

Compliance with Applicable Laws, Regulations and Practices:

Suppliers are required to act in accordance with all applicable federal, state and local laws and regulations. Where applicable, suppliers must comply with all relevant international laws.

Legal, Regulatory, Workplace and Human Rights

- **Respect and Dignity**
We expect our suppliers to promote a safe, respectful and productive workplace by establishing and maintaining fair employment practices, including complying with laws that prohibit harassment.
- **Voluntary Employment**
Suppliers must ensure that no forced labor, including bonded, indentured and involuntary prison labor is used. Only voluntary employment may be utilized and workers must be allowed to terminate the employment at any time upon reasonable notice.
- **Child Labor**
Suppliers and their subcontractors are to ensure that child labor is not used in the performance of work. The term “child” refers to any person under the minimum legal age for employment where the work is performed.
- **Working Hours, Conditions and Wages and Benefits**
Suppliers must comply with all applicable laws governing the number of maximum work hours, vacation time, leave periods and holidays. Suppliers’ employees shall not work beyond the maximum working hour permitted by applicable law. Suppliers will compensate for overtime hours in accordance with applicable laws. Suppliers Must comply with all applicable laws regarding working conditions, including worker health and safety, sanitation, fire safety, risk protection and electrical, mechanical and structural safety by implementing an employee safety management system. Suppliers must provide compensation, including regular wages and overtime hours, and legally mandated benefits, in accordance with all applicable laws and standards. Suppliers must maintain a safe and healthful workplace for their employees free of illegal drugs or controlled substances.
- **Commitment to Freedom of Association**
Champlain requires that its suppliers recognize and respect the rights of employees

to freely associate, organize, and collectively bargain in accordance with all applicable laws. Additionally, Champlain encourages its suppliers to establish open communication and direct engagement between employees and management as a means by which to support positive employee relations.

- **Non-Discrimination**

All conditions of employment must be based on an individual's ability to do the job, not on the basis of personal characteristics or beliefs. Suppliers must not discriminate in hiring and employment practices based upon race, color, gender, gender identity or express, religion, age, nationality, sexual orientation, social or ethnic origin, disability, pregnancy, political affiliation, veteran status, union membership or marital status.

- **Employee Health and Product Safety**

Suppliers must protect the health, safety and welfare of those who may be affected by their activities by complying with all applicable environmental health and safety laws, regulations and directives. Suppliers must also insure their contribution to product safety.

Conflict Minerals

We expect our suppliers to acknowledge that Champlain is subject to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act") and the implementing rule promulgated by the U.S. Securities and Exchange Commission (SEC) which will require reporting related to tin, tantalum, tungsten and gold (the "Conflict Minerals") contained in products.

Confidential/Proprietary

Suppliers should safeguard all sensitive information, including proprietary and confidential information disclosed by Champlain, physical property or personal data of Champlain and its employees and customers which is in their care or possession, and use any such information only for the business purposed for which it was provided.

Financial Responsibility/Accurate Records

We expect our suppliers to accurately record, maintain, and report business documentation, including but not limited to, financial accounts, quality reports, time records, expense reports, resumes and submissions to Champlain.

Environmental Responsibility

Suppliers must make every effort to protect the environment and must comply with all applicable laws and regulations. Champlain encourages all of its suppliers to consider registration to the international environmental standards, ISO-14001.