

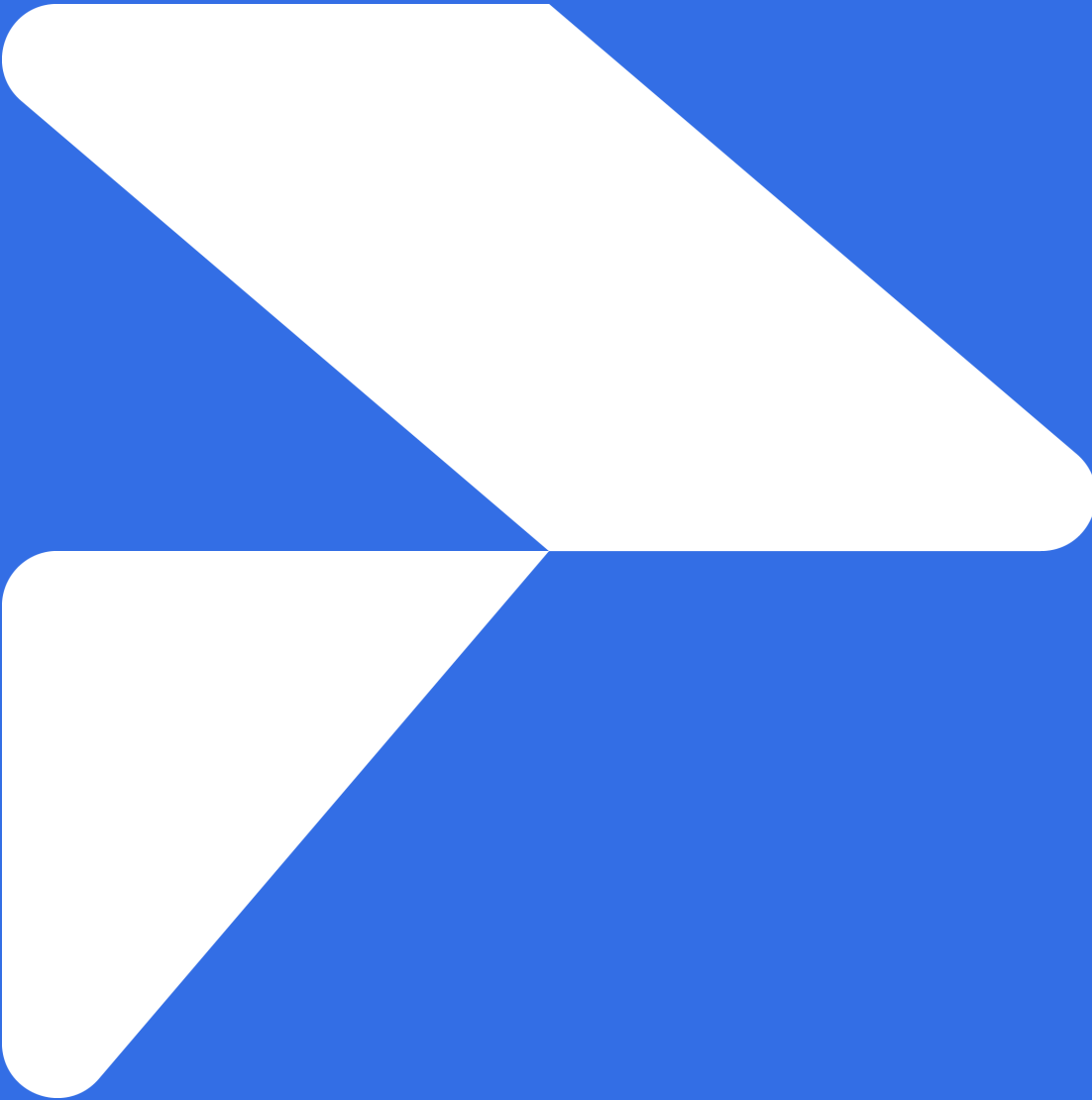


Code of Ethical Conduct



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Introduction to our Code

Rehlko is committed to compliance with all laws and regulations in the countries where we operate. This Code is the foundation of our commitment to ethical business practices. It sets out the standards for how we interact with each other and engage in business activities globally. Additionally, the Code summarizes the guidance and expectations set out in each of our Global Core Policies.

The Code applies to Rehlko (the Company), subsidiaries, associates, those who work for or represent Rehlko, and members of the Board of Directors when acting in their capacity for Rehlko.

Violation of this Code and Company policies may result in disciplinary action, up to and including termination of employment.

Ethics at Rehlko

Do the Right Thing, Every Day

Whatever our role at Rehlko, ethics should be central to every business decision we make. All associates must take personal responsibility for knowing and following the law, being honest and objective, competing fairly, respecting others, building trust, exhibiting loyalty, avoiding conflicts of interest, and protecting Rehlko's positive reputation.

Even if there is no specific policy or law to follow, we will make the best decisions for Rehlko when we are committed to acting with integrity and asking for help in situations where doing the right thing is not entirely clear. We must not allow business goals to cause us to lose sight of our commitment to ethical business practices.

Remember:

To help determine the right path, we should ask these questions when making decisions or taking action in our role:

- Is this legal?
- Is this consistent with our code and policies?
- Does this reinforce Rehlko's reputation as an ethical company?
- How would this look to others within Rehlko and externally?



Standards of Conduct

Associates

Associates can do the right thing, every day, by:

- Understanding the Code and Global Core Policies
- Gaining a deeper understanding of other policies directly applicable to our position, business, or function;
- Being truthful and behaving in a transparent and authentic way;
- Being accountable for an ethical work environment;
- Completing relevant compliance and ethics training; and
- Being committed, promptly speaking up when something is not right, and cooperating fully and honestly if concerns are raised.

People Leaders

Managers and leaders have increased responsibility for laying the foundation for a culture of compliance and ethics by:

- Serving as a positive role model of integrity with words and actions;
- Emphasizing Rehlko ethics in decision making;
- Knowing and sharing key risks that impact our business activities;
- Creating an environment where associates are empowered to respectfully challenge the status quo, ask questions, and raise concerns;
- Preventing retaliation against those who speak up; and
- Recognizing those who exemplify integrity and compliance.



Reporting Concerns

All associates have the responsibility to speak up and raise questions and concerns about potential compliance issues. The Code cannot describe every possible situation we may encounter in our daily work. If the answer is not found in the Code, seek guidance. There is no requirement to be "correct" before speaking up; the obligation is simply to raise the issue in good faith.

All concerns of potential or actual violation of the Code, policies, procedures, and laws must be reported so that they can be addressed. The matter will be reviewed as required by law and per Rehlko's investigation process. Confidentiality is respected and information is only disclosed to persons necessary to complete the investigation or as required by law.

Management and Human Resources are also excellent resources for questions and guidance about job-specific policies and processes, work responsibilities, coworker issues, discipline disputes, or promotion opportunities.

Rehlko is committed to an environment in which associates raise concerns without fear of retaliation. The Company will not tolerate direct or indirect retaliation against an associate who has reported a concern in good faith or participated in an investigation pertaining to a violation of law, the Code, or other Company policies. Any form of retaliation against associates who raise an ethics or policy concern may result in discipline up to and including termination.

Rehlko offers many channels for asking questions and raising concerns about potential or actual Code, policy, or legal violations. Contact the following with questions or concerns:

- Manager or Supervisor
- Human Resources
- Legal
- Compliance and Ethics
- Corporate Security
- Internal Audit

Another option is to contact the Ethics Helpline:

- Email: energy.ethics.helpline@rehlko.com
- Web portal: <https://rehlko.ethicspoint.com>
- Phone: Visit <https://rehlko.ethicspoint.com> to find the phone number and dialing instructions for your country
- Mobile: Scan the QR code



Fair Employment Practices

Rehlko's Commitment

At Rehlko, we strive to create a diverse and inclusive culture where we bring our full selves to work and know we are valued team members working together with a shared purpose. The variety of our backgrounds and experiences contributes to the success of Rehlko.

Rehlko is committed to fairness in all employment-related processes and programs. Rehlko provides equal employment opportunity to all individuals regardless of race, creed, color, religion, gender, gender identity or expression, age, national origin, disability, veteran status, marital status, sexual orientation, military status, or any other characteristic protected by law.

Rehlko is also committed to fairly paying associates in compliance with all applicable wage and hour laws, rules, and regulations. Employment at Rehlko is freely chosen, and associates are free to leave at any time.

Our Role

As associates, we support these commitments by:

- Ensuring employment decisions are based on ability and not on beliefs or any other personal characteristic;
- Providing fair and equitable wages, benefits, and other employment conditions in accordance with local laws;
- Prohibiting the use of forced, involuntary, and child labor and the unreasonable restriction of associates' freedom of movement; and
- Ensuring our suppliers and business partners uphold the same principles.

The Scenario

When first hired and as a transgender woman, Pat was confident in the Company's commitment to providing an equal opportunity work environment. But during the first few months on the job, Pat quickly felt discriminated against because of their identity as a transgender woman. It was not anything blatant, but Pat was not given the same challenging assignments, responsibilities, and opportunities as team members who identify differently. Although there was no one specific situation that represented Pat's concerns, the situation had to be addressed.

Our Stance

At Rehlko, our fair employment practices policy must be represented and upheld beyond the recruiting and hiring process. Concerns should be brought to a manager or supervisor, Human Resources, Legal, Compliance and Ethics, or the Ethics Helpline.



Respectful Workplace

Rehlko's Commitment

Rehlko believes that experiences in the workplace have the power to influence our lives and change the direction of our future. In addition, Rehlko believes that a respectful workplace is the foundation of a great place to work and one that sparks creativity and enhances a sense of mutual trust.

With that in mind, Rehlko is committed to providing such a work environment—one that is free of all forms of harassment, including sexual harassment and bullying.

Our Role

As associates, we support this commitment by treating one another with respect and dignity, embracing diversity, and supporting an inclusive workplace. In addition, we do not engage in prohibited behaviors, which include, but are not limited to:

- Unwelcomed conduct or statements of any kind that causes others to feel uncomfortable or intimidated;
- Belittling or humiliating comments or nicknames;
- Threatening or intimidating conduct;
- Sexually explicit or suggestive remarks, texts, or emails;
- Sexual advances or unwanted physical contact; and
- Racial, ethnic, gender, or religious slurs or offensive comments about gender identity or sexual orientation.



The Scenario

Chris has been hired full time at the Company. One of the senior managers from a different department always makes an extra effort to stop by Chris's desk, which is something the manager does not do with other new associates. The manager recently texted Chris with an invite to a weekend night dinner. Chris was uncomfortable with this invite and declined. The manager hinted that if Chris attended dinner, the manager would consider recommending Chris for a higher role within the Company. Chris is uncomfortable with the manager's behavior and comments.

What action should Chris take?

Our Stance

Rehlko is firmly committed to providing a respectful work environment for all associates free of all forms of harassment. Chris should immediately discuss this situation with a direct manager, Human Resources, or the Ethics Helpline. Likewise, coworkers who witness this situation are expected to report it to management, Human Resources, or the Ethics Helpline.

Remember:

Harassment is determined by actions and words and how they impact others, regardless of intent. As associates, we speak up if we witness these behaviors so they can be immediately addressed.

Alcohol & Controlled Substances

Rehlko's Commitment

Rehlko has had a long-standing commitment to provide a safe workplace for all associates and to establish programs promoting high standards of associate health and safety. The use of alcohol and controlled substances may affect the workplace and the performance of job duties and create an unsafe environment for associates and our suppliers, customers, and business partners. For these reasons, Rehlko is committed to providing an environment free from alcohol and other drug use.

Our Role

As associates, we support this commitment by:

- Never possessing, distributing, or using alcohol during working hours or on Company property at any time unless previously approved by leadership for a Company-sponsored corporate event;
- Never possessing, distributing, or using illegal drugs during working hours on Company property at any time; and
- Notifying management about any use of legally prescribed or over-the-counter drugs for medical purposes that may impair our ability to work safely or affect the safety of others.

Important:

All associates must report to work in suitable mental and physical condition and consistently and safely perform work for and on behalf of Rehlko.



Intellectual Property Protection

Rehlko's Commitment

At Rehlko, because we live on the leading edge of design and technology, our intellectual property (IP) is one of our greatest assets. Our IP is key to our competitive advantage and supports our mission of creating a higher level of gracious living for those who are touched by our products and services.

Our Role

As associates, we commit to protecting our IP and other confidential information and expect our business partners to do the same. Likewise, we only use other companies' IP with proper authorization. To support our commitment, we:

- Do not disclose or use IP or other confidential information except as required by our position at Rehlko;
- Will not take Rehlko IP or confidential information at any time, including upon leaving the Company;
- Follow all internal procedures and guidelines when implementing new features, aesthetics, or functionality into products under development and when naming new products, features, or services; and
- Immediately report confirmed or suspected exposure of Rehlko IP or confidential information to the proper internal contacts.

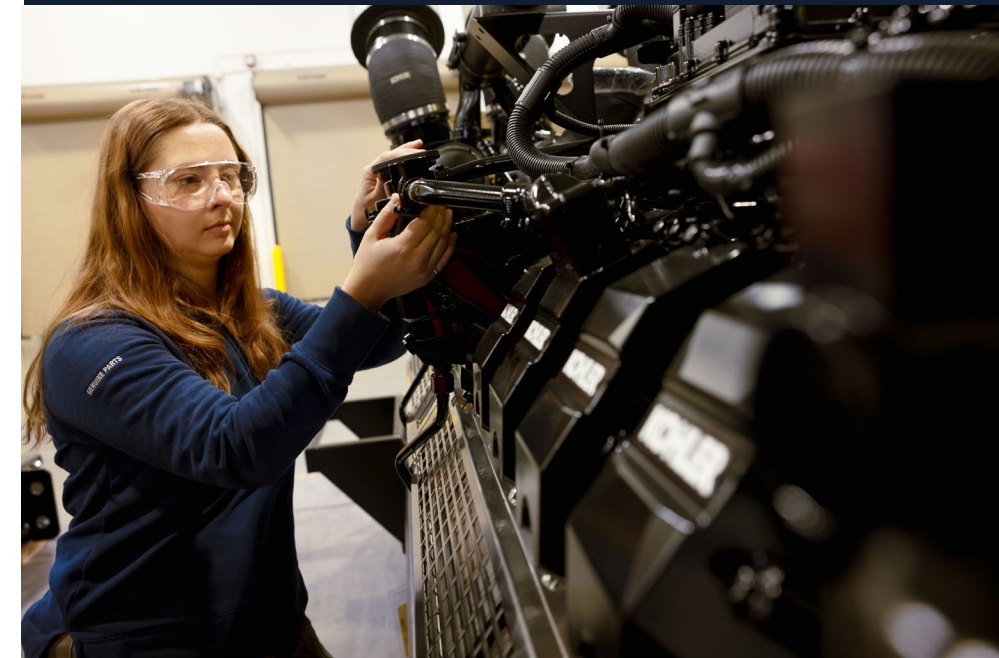
Our obligation to protect IP remains even after we end our employment at Rehlko.

The Scenario

An engineering team worked for a year on breakthrough technology, with a significant amount of money invested in R&D. During that time, an associate from the product team lost their laptop at an industry trade show. Two months before the product launch, a competitor introduced breakthrough technology.

Our Stance

Exposing intellectual property can ruin a brand's reputation, give the competition an unwarranted competitive edge, and potentially demoralize the associates of the Company. Protecting IP and confidential information must be a top priority. If this type of information is lost or unintentionally exposed, immediately contact Legal.



Information Technology Use & Security

Rehlko's Commitment

Rehlko places high value in the proper and secure use of state-of-the-art technology to support ongoing business operations and communications. To meet this commitment, Rehlko provides email, collaboration platforms, computer systems, and smartphones to associates globally.

Our Role

As associates, we have a responsibility to protect Rehlko's technology and systems and use them for authorized business purposes. We appropriately protect and use technology and information by:

- Only using approved standard corporate applications, software, protocols, and hardware;
- Properly labeling our records for security purposes;
- Being aware of suspicious emails and links that may compromise our systems;
- Ensuring our information is not released to, shared with, or viewed by unauthorized parties; and
- Never granting unauthorized personnel access to the Rehlko network.

The Scenario

Arturo is an analyst who handles highly protected information and frequently needs to transmit this information to coworkers for their review and input. Arturo emails the spreadsheet to the team for review. Is Arturo keeping this highly protected information secure? What steps should Arturo take when transmitting Company highly protected and confidential information?

Our Stance

Rehlko requires that all information be handled in accordance with its sensitivity, whether it is labeled "confidential" or not. At a minimum, when transmitting any type of highly protected information, Arturo should password protect the file prior to sending, with the password sent under separate email.

The Company's technology solutions are additional ways to securely share files with other authorized individuals to reduce the risk of inappropriately transmitting confidential information.

Important:

All technology and information used or stored on Rehlko's network belongs to the Company and should not be considered private. To the extent permitted by applicable law, Rehlko reserves the right to monitor or disclose messages, documents, or other files on Company devices without notice.



Privacy

Rehlko's Commitment

Rehlko views personal information as a valuable way to provide a unique and memorable experience for all those we connect with through our products and services. In addition, this information allows us to best manage our relationships and obligations with customers, business partners, and fellow associates. With that in mind, Rehlko is dedicated to complying with applicable regulations that support data privacy requirements and the protection of personal information.

Our Role

While we may gather and use personal information, we ensure it is properly protected. To ensure appropriate protection and handling, only authorized individuals may access and use this information for legitimate business purposes. These individuals must ensure the information is:

- Collected with full transparency, including its intended use;
- Only used for the purposes in which it was collected; and
- Kept confidential and securely stored.

All of us, regardless of whether we are considered authorized individuals, are responsible for reporting any inappropriate exposure and ensuring no additional exposure occurs (such as by securing any paper copies or notifying the email sender of the exposure and then deleting the unintended email).

What is personal information?

Any information that can be tied to a person, such as:

- Name, address, email, employment history, compensation, health information, performance or disciplinary matters.
- Credit card information from associates, guests, vendors, and business partners.

Important:

As associates, we understand the trust our customers, business partners, and fellow associates place in us to ensure their information is kept confidential and protected.



Social Media

Rehlko's Commitment

Rehlko is committed to increasing its positive impact around the world and expanding awareness of our uniquely designed products and services. Social media activities are one way to achieve these goals. Rehlko recognizes that the use of social media allows the Company and associates new ways to collaborate, connect, and share positive stories and news with family, friends, fellow coworkers, and customers.

Our Role

We must comply with our Social Media Policy when using these platforms for business as well as personal purposes if we identify ourselves as Rehlko associates or if we are using Rehlko equipment or systems.

In addition, as associates, we:

- Do not misrepresent ourselves or Rehlko or speak on behalf of the Company unless specifically authorized;
- Never disclose Company, customer, supplier, or associate confidential information; and
- Respect all individuals, races, religions, and cultures in support of our diverse and inclusive workplace and avoid posting anything that can be viewed as harassment, bullying, or similar behavior not allowed in the workplace.

The Scenario

Nikola is connected on Facebook with a coworker whose last day is in a few days. Nikola's coworker posts on Facebook, "Exciting news! I have accepted a promotion with another company. Thank you to my Rehlko customers for your business throughout the years." The coworker then lists major customers and thanks them for their specific sales contracts with Rehlko.

Nikola is unsure if the coworker's Facebook page is private or public. Is this acceptable and is there anything Nikola should do?

Our Stance

Regardless of if a personal social media account is private or public, we are never allowed to share customer confidential information. The release of such information may not only be harmful to the customer but may also pose risk and reputational impact to Rehlko. Nikola should report this to a manager or supervisor, Human Resources, Legal, Compliance and Ethics, or the Ethics Helpline.



Fair Competition

Rehlko's Commitment

Rehlko is committed to delighting our customers with high-quality, innovative products and services at competitive prices. Rehlko supports fair and vigorous competition that allows customers to benefit from choice in a free market economy. With that in mind, Rehlko prohibits agreements or arrangements with competitors that fix prices, coordinate bids, allocate customers or sales territories, or otherwise eliminate or restrict competition for its goods or services.

Our Role

As associates, we comply with all applicable competition laws and regulations. To support our commitment, we:

- Never propose or enter into agreements or understandings about any aspect of competition between Rehlko and a competitor;
- Never receive, provide, or exchange competitive information with competitors, such as customers, prices, bids, distribution methods, profits, market share, strategy, territories, products, or sales terms;
- Avoid contacts with competitors that may create the appearance of improper agreements or understandings; and
- Ensure that we engage Rehlko Legal when we have questions regarding contacts with competitors, handling of competitive information, agreements or bidding, or joining with competitors to lawfully present industry positions to federal, state, or local governments.

The Scenario

Arlo approaches a supervisor with concerns about Q4 sales. The supervisor pulls Arlo aside “in confidence” about an “arrangement” made with a competitor to adjust its pricing and position to help meet the Company’s quarterly sales goals. Arlo fears this may violate ethical and legal practices and put the Company at risk.

Our Stance

Rehlko abides by antitrust and competition laws to preserve and protect fair and open competition. As associates, we are required to fully comply with all antitrust and competition laws pertaining to contracts or joint activities with other companies. Creating such an “arrangement” with a competitor is strictly prohibited. Arlo should report this to a manager or supervisor, Human Resources, Legal, Compliance and Ethics, or the Ethics Helpline.

Important:

Violation of antitrust laws may result in severe criminal and civil legal penalties for our Company and for individuals involved.



Global Market Access & Trade

Rehlko's Commitment

As a global manufacturing leader, Rehlko is committed to complying with all applicable international regulations. This includes both lawful access to global markets and the exchange of goods across borders. This commitment includes:

- Ensuring our products meet the various technical product regulatory requirements, such as safety, environmental performance, and end-of-life requirements, of the countries and states where they are made and to be sold; and
- Demonstrating compliance with laws and regulations governing the import and export of goods, trade restrictions ("sanctions"), and trade bans ("embargos").

Our Role

As associates, we comply with all applicable international regulations where we trade and sell product. This includes:

- Ensuring Rehlko product design, sourcing, testing, documentation and inspections comply with requirements of where they are to be sold;
- Ensuring Rehlko products have the required certifications and approvals prior to being imported, exported, and sold internationally;
- Ensuring accurate documentation and appropriate product and packaging markings, classifications, and proper valuation declarations are provided;
- Ensuring accurate and timely reporting of regulatory compliance information to appropriate government agencies;
- Only interacting or corresponding with government officials with the proper delegation of authority from Rehlko;
- Never facilitating transactions exporting or re-exporting U.S. origin goods, technology, or services to sanctioned entities, people, or countries; and
- Never agreeing to any restrictive trade practice or boycott that is prohibited by U.S. and other laws.

We need to understand that all import and export rules and regulations apply to all our products, parts, materials, software, and technology ensuring global market access and trade compliance adherence.



Anti-Corruption

Rehlko's Commitment

Rehlko has upheld the highest standards of integrity, and the Company remains committed to complying with anti-corruption laws where we operate. Rehlko prohibits any form of bribery, anywhere in the world, in both the private sector and with governments. Violations of antibribery laws can result in serious sanctions for both the Company and individuals involved.

Our Role

As associates, we are prohibited from directly or indirectly:

- Promising, offering, making, or authorizing a payment or giving anything of value intended to influence an act or decision, obtain or retain business, or secure an improper business advantage; and
- Making payments to expedite the performance of a routine administrative or government action, except with prior Compliance or Legal approval or when an associate's safety or security is at stake.

Associates, contractors, and third parties acting on behalf of the Company are expected to know how to identify and avoid corruption. In addition, we follow all internal guidelines regarding:

- Screening and selection of third parties representing Rehlko;
- Gifts, hospitality, and other business courtesies;
- Travel and meals;
- and political contributions.



The Scenario

Taylor is the manager of a new manufacturing facility. Local regulations require completion of an application form and payment of a licensing fee prior to starting production, which normally takes two to three days. The local government official responsible for the license has been slow to approve the application. The official informs Taylor that the application was not properly completed but is willing to overlook it if the Company contributes 20 new home generators to a local orphanage.

Our Stance

Even though the orphanage may be a legitimate charity in need of home generators, the government official's actions should be considered a request for a bribe, and Taylor should not agree.

Instead, Taylor should request that the official identify the alleged defects on the application so they can be corrected. In most situations, Taylor should also raise the matter with the official's manager, thereby creating the opportunity to let it be known that Rehlko does not engage in such inappropriate behavior.

What is "anything of value"?

Cash, hospitality (travel, meals, entertainment), kickbacks, donations or sponsorships, excess commissions, internships or jobs, rebates, gifts, or other items of value.

Conflict of Interest

Rehlko's Commitment

Rehlko's business decisions are based on what is best for the Company as a whole and our customers. Rehlko expects us as associates to continue building our reputation as a fair, honest business and business partner by maintaining our objectivity in all business dealings.

A conflict of interest occurs when personal interests or interests of family and friends have the potential to hinder our ability to make an objective decision in the best interest of Rehlko. Examples:

- Financial investments outside the Company;
- Employment, consulting, or other positions outside Rehlko;
- Political activities;
- Close personal relationships in a direct or indirect reporting line or with others working for a supplier, partner, competitor, or customer of Rehlko; and
- Other situations that may create a conflict between an associate and the Company.

Our Role

As associates, we do not use our position at Rehlko to obtain favors or benefits for ourselves or others, and we should avoid any situations that may cause the perception of divided loyalty. In addition, we are responsible for disclosing any actual, perceived, or potential conflict of interest—both at hire and throughout our Rehlko employment. The Company will work with us to remove any risk to Rehlko.

The Scenario

Marlow was contacted by an external company via social media. The company offered to pay \$200 USD per hour to “consult” for them by answering questions about products, manufacturing, and sales trends in the home and decor space. Marlow is considering the offer because it is decent money and in an area of Marlow's expertise. What should Marlow do?

Our Stance

This situation is a conflict of interest because it parallels Marlow's role at Rehlko. In addition, it is possible this company is a competitor of Rehlko or works for one.

In this situation, Marlow should decline the offer.



Accounting & Records

Rehlko's Commitment

Rehlko is committed to building trust by maintaining accurate and truthful records for all business dealings. While Rehlko is a privately held company and may not share financial information with the public, Rehlko does regularly provide financial information to shareholders, auditors, and regulators. When information is provided, Rehlko is candid, complete, and truthful.

But building trust requires more than just communications—it also includes behaviors. Rehlko expects associates to always behave in a manner consistent with our high ethical standards. With that in mind, Rehlko associates maintain accurate and timely reporting and management of our financial transactions and other financial and Company records, such as contracts and employment agreements.

Our Role

As associates, we uphold our commitment to building trust by ensuring:

- Company money and other assets are used appropriately, for documented business purposes, and never taken without authorization;
- Transactional and operational records are accurate and comply with legal, regulatory, and Company record keeping requirements;
- Business is conducted only with entities who engage in legitimate business practices;
- Financial transactions follow established processes to ensure control, cost efficiency, and global standardization; and
- No individual associate has sole control over the life cycle of a transaction, and critical tasks have shared responsibilities.

Important:

As associates, we maintain the integrity of our books, records, and all reports and documents that detail our business and Company operations.



Supplier Relationships

Rehiko's Commitment

Rehiko strives to develop relationships with high-quality suppliers who commit to our expectations of practicing the highest legal, moral, and ethical standards. Rehiko will only work with suppliers who adhere to our guidelines and applicable international laws on:

- Ethics, business integrity, and anticorruption;
- Health and safety;
- Environmental management; and
- Labor and human rights.

In addition, Rehiko is committed to creating an environment where suppliers have an incentive to continue to work with us and remain confident that they will be treated lawfully and ethically. Rehiko is committed to the fair selection of all suppliers.

Our Role

In support of Rehiko's commitment, as associates, we ensure:

- A competitive and impartial analysis when selecting or awarding business to a supplier;
- Proper authorization and appropriate terms and conditions are met prior to engaging suppliers; and
- Supplier compliance with all applicable laws in locations where they operate.

In addition, we must avoid actual or perceived conflicts of interest associated with suppliers and must never accept gifts or other items of value that influence or appear to influence the selection process or gain favor for or from a supplier.



Internal Communication: For internal & partner use only.

The Scenario

The manager of a supplier currently participating in a bid for business with Rehiko sends two tickets to Disney World to Armani over the holiday season. The enclosed card says, "Happy Holidays, hope you and your partner enjoy this token of our appreciation for considering us for business. Cheers."

What should Armani do?

Our Stance

Armani should return the gift because a bid for business with Rehiko is ongoing, and Rehiko policy prohibits the acceptance of gifts or other items appearing to influence the selection process or gain favor.



Environment, Health & Safety

Rehlko's Commitment

Rehlko is committed to provide a safe and healthy work environment as our most valuable resource is our associates. Like everything the Company does, its safety initiatives and proactive measures are designed to exceed minimum standards—which help to create a culture that produces world-class safety performance.

Rehlko is committed to conducting its operations in a manner that protects people, property, communities, and the environment by providing a safe and healthy work environment.

Rehlko associates have the responsibility and authority to stop work immediately without fear of reprisal when they believe a situation exists which places themselves, others or the environment in imminent danger. In addition, Rehlko associates are required to comply with the “Serious 7” lifesaving rules which require mandatory compliance with requirements set forth in the following programs:

- Lockout / Tagout / Tryout
- Confined Space Entry
- Cranes, Hoists, Lifting Equipment
- Work at Heights
- Electrical Safety
- Machine Guarding
- Powered Industrial Vehicles

Our Role

To achieve Rehlko's safe and healthy work environment, we:

- Comply with environmental, health, and safety laws that apply to our operations around the world;
- Ensure awareness of our safety and surroundings;
- Have the knowledge, skills, and abilities to perform work duties safely; and
- Take appropriate action to respond to circumstances or conditions inconsistent with our belief, purpose, policies, or commitment.



The Scenario

A factory associate who works close to Aarya fails to use proper techniques throughout the day, possibly endangering others. Aarya has reported this behavior several times to supervision. However, Aarya has heard the associate has avoided disciplinary action because the associate is a golf buddy with someone in upper management.

Our Stance

The commitment to “safety first” cannot be compromised by playing favorites. Any behavior that puts associates at risk of injury must be reported immediately. These concerns should be brought to a manager or supervisor; site Environment, Health, and Safety (EHS); regional EHS Manager; Human Resources; Legal; Compliance and Ethics; or the Ethics Helpline.



Securing Operations

Rehlko's Commitment

Rehlko's associate activities and world class products, services, safety performance, and operations are complemented by a world-class security program. The Company uses best practices and procedures to prevent and address security concerns as well as natural incidents that may impact people, facilities, products, operations, and our global supply chain.

Part of this world-class security program is physical security. Physical security is an essential part of Rehlko's security plan as it forms the basis for all other security efforts. Rehlko requires that all associates, contractors, and visitors understand their responsibilities when allowed access to our buildings, grounds, and resources. In addition, part of our physical security program is a zero-tolerance standard regarding violence or threats of violence at any time at Rehlko, whether on Company property or at Company-sponsored events.

Our Role

As associates, we support Rehlko's commitment by:

- Never engaging in any violent behavior or making threats of violence against Rehlko, coworkers, customers, contractors, suppliers, or other business partners;
- Adhering to all entry and exit procedures, such as displaying photo ID badges as required and ensuring external doors are secured;
- Questioning or reporting unescorted visitors or individuals who do not display or have a badge;
- Ensuring proper registration and identification of all contractors, visitors, vendors, and delivery drivers;
- Only using video or audio equipment when approved; and
- Actively participating in emergency response planning and training, workplace violence prevention training, and other security awareness sessions.

As associates, we maintain situational awareness to protect ourselves, coworkers, and visitors and report any suspicious activity or potential threats.

Important:

Violent conduct by a Rehlko associate, customer, contractor, or supplier will not be tolerated. That said, in addition to discipline, associates who exhibit violent behavior may be subject to criminal prosecution in the country in which they are working.



Sustainability & Our Communities

Rehlko's Commitment to Sustainability

Rehlko respects the global ecosystem and shares the environmental concern of the communities in which we live and work. This is exemplified in our long-standing tradition of incorporating environmental stewardship and safety considerations into all our activities. Recycling and energy conservation, waste minimization, and water-reduction practices are integral business requirements. Our products, services, manufacturing methods, and facilities incorporate safety and environmental management systems to ensure continuous improvement and measures to prevent pollution, protect health and safety, and enhance the environment.

Rehlko's Commitment to Our Communities

At Rehlko, we believe our best can always be better: better for the lives we touch, better for our communities, better for our planet, and better for business. Our expertise in energy systems and manufacturing drives research and innovation to support the communities in which we live and do business. Efforts are made to make Rehlko's position known on issues affecting the Company, associates, shareholders, the private sector, and our communities.

Our Role

As associates, we are encouraged to connect with our communities and drive innovation to continue making a long-lasting impact by:

- Submitting new, innovative product and business opportunities through our internal processes; and
- Ensuring expenditures of any Company funds—for either providing financial and product support to organizations and causes or supporting Rehlko's position in the political process—are appropriately approved through our internal guidelines.

Resources

Speak Up

To report potential or actual Code, policy, or legal violations, contact any of the following:

- Manager or Supervisor
- Human Resources
- Legal
- Compliance and Ethics
- Corporate Security
- Internal Audit
- Ethics Helpline:
 - Email: energy.ethics.helpline@rehlko.com
 - Web portal: <https://rehlko.ethicspoint.com>
 - Phone: Visit <https://rehlko.ethicspoint.com> to find the phone number and dialing instructions for your country
 - Mobile: Scan the QR code



More information is available for associates:

Global Core Policies:

<https://rehlko.sharepoint.com/sites/KohlerEnergyGlobalCorePolicies>

Ethics at Rehlko: <https://www.rehlko.com/ethics>

The Code of Ethical Conduct outlines the principles we are expected to comply with when it comes to ethical conduct. When an unusual circumstance occurs that may require an exception, the circumstance must be submitted to the Chief Legal Officer for review and approval before taking any action.

This Code is also not a contract, does not modify the at-will employment relationship that Rehlko has with associates where it exists, and is subject to change by Rehlko from time to time without prior notice. Nothing in this Code should be construed to limit an associate's right to engage in any activity protected under applicable laws including, but not limited to, Section 7 of the U.S. National Labor Relations Act. This Code was written with the intention of complying with all current country, federal, state, and provincial laws and regulations in the jurisdictions in which Rehlko and its related entities operate. If there is a discrepancy between this Code and applicable law, then the applicable law governs.