

## Introduction

At Horton, we believe that adhering to the highest possible standards of integrity and ethical behavior is the only way to succeed, and so we have set the highest standards for the way we conduct business, in all areas ranging from corporate and social responsibility to sound and responsible business ethics. As such, because the conduct of Horton suppliers can be attributed to Horton and its reputation, our expectation is that our suppliers will lawfully conduct their business with the same standards of integrity and ethical behavior. 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 additional requirements that Horton 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 and Regulatory

### Export Control Laws

Horton is subject to laws that regulate, restrict and sometimes prohibit business dealings with certain countries, entities and individuals. These restrictions include controls on export and reexport of goods that originate in the United States or that contain U.S. parts, components, subassemblies or assemblies. International Traffic in Arms Regulation (ITAR) rules may apply to products or technical data used in any type of military application. Suppliers must be aware of these restrictions.

### Bribery and Corruption

Horton strictly forbids all bribery to anyone, anywhere. Suppliers must follow all anti-bribery laws throughout the world and educate their employees about compliance with these laws and specifically The United States Foreign Corrupt Practices Act (FCPA).

### Fair Competition and Anti-Trust Compliance

Suppliers must comply with all local anti-trust or anti-competition laws and regulations. These laws deal with agreements among competitors to engage in price discrimination or other acts that may unfairly reduce competition.

### Responsible Sourcing

Through due diligence, Horton suppliers and their subcontractors are expected to discern the source of the raw materials in their products in order to uphold the highest standards of integrity and ethical behavior. Horton is committed to these standards and recognizes the negative implications of conflict minerals in

terms of human rights violations, ethics violations or environmental impacts. Suppliers must acknowledge their commitment to responsible sourcing along their supply chains.

## **Workplace and Human Rights**

### **Respect and Dignity**

Proper measures must be taken to promote a workplace free from harassment, harsh treatment, threats of violence, corporal punishment, or other forms of coercion.

### **Voluntary Employment**

Horton 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**

Horton suppliers and their subcontractors are forbidden from using child labor in any circumstance. The term "child" refers to any person employed under the age of 15 (or 14 where the applicable laws permit). Horton suppliers must ensure proper employment of minors at all stages of the process.

### **Working Hours, Conditions, and Wages and Benefits**

Horton 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 hours 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 such as OHSAS 18001. Suppliers must provide compensation, including regular wages and overtime hours, and legally mandated benefits, in accordance with all applicable laws and standards.

### **Commitment to Freedom of Association**

Horton 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, Horton 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. Horton suppliers must not discriminate in hiring and employment practices based upon race, color, gender, gender identity or expression, religion, age, nationality, sexual orientation, social or ethnic origin, disability, pregnancy, political affiliation, veteran status, union membership or marital status.

## **Environmental Compliance**

### **Environmental Responsibility**

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

## **Horton Technology, Information and Intellectual Property**

### **Confidential Information**

The secure use and distribution of information and data in the workplace is critical to Horton and our supply base in today's competitive marketplace. Both parties must maintain physical and electronic security for all confidential. If confidential information is to be discussed or exchanged between Horton and the supplier or the supplier and a Third Party, the parties must first ensure that a confidentiality or non-disclosure agreement has been signed and is in place.