6.0 RULES OF CONDUCT FOR SUPPLIERS

Elkay’s increasing global presence has resulted in growth in international sourcing. Elkay is committed to its values and ethics in its global operations and seeks to ensure that products it sells, including all components of those products, are produced under conditions that respect worker rights and our environment.

While Elkay recognizes the complex issues faced in many developing countries, there are basic standards regarding workers’ rights and protecting our environment that must be met by those seeking to do business with Elkay as a supplier.

To ensure that the products and components that Elkay sells have been produced under conditions that respect worker rights and the environment, Elkay requires that suppliers seeking to do business with it evidence their commitment to these basic standards. Elkay will conduct a physical review of each new supplier to ensure that it meets requirements with respect to applicable laws and working conditions, including laws against human trafficking and slavery. Specifically, Elkay will not knowingly enter into business relations with a supplier, subcontractor, or business that:

- Directly or indirectly uses child labor
- Makes use of any type of forced or involuntary labor (including slavery or human trafficking)
- Subjects its employees to any form of abuse, physical discipline or physical or psychological mistreatment
- Does not comply with local laws regarding hours worked, overtime, and days off
- Does not undertake to comply with local environmental laws
- Does not provide its employees with adequate safety and protective equipment.

In addition to the process for selecting new suppliers, Elkay engages in verification of the practices of its existing supplier base through periodic audits to assess risks and ensure compliance with laws and working conditions (noted above), including laws governing human trafficking and slavery.

Elkay will not knowingly work with suppliers that do not respect these standards and those of our customers. We will periodically assess the supplier’s compliance with these standards. Any reported non-compliance will be investigated and appropriate action will be taken. Elkay will attempt to work with supplier to remedy the violation. If the effort to remedy the violation is unsuccessful, Elkay will evaluate the business relationship and take appropriate corrective action. Corrective action may include several actions, including cancelation of a Purchase Order up to termination of the use of a facility or supplier. If a supplier refuses access of the facility to our auditors, the relationship with that supplier will be terminated.

This is to confirm that I, ______________________ of _______________________ (the “Company”), have read and understood the attached Elkay Manufacturing Company Rules of Conduct for Suppliers and that the Company will respect the rules as identified above.

Signed at _________________________ the _____ day of _____________ 20__.

Signature: _________________________ Company name: _____________________