

Introduction

Corporate integrity, responsible product sourcing, and the safety and wellbeing of workers across the global supply chain are of paramount importance to Roller Bearing Company of America, Inc. and its subsidiaries (collectively, "RBCA"). These principles apply to all aspects of RBCA's business, and encompass all manufacturers, distributors, vendors, consultants and other suppliers of goods or services to RBCA ("Suppliers").

These principles are reflected in this Code of Conduct, which establishes the minimum standards that must be met by any Supplier regarding:

- treatment of workers;
- workplace safety;
- impact on the environment; and
- ethical business practices.

Applicability

This Code of Conduct applies to all third parties that directly or indirectly provide goods or services to RBCA. Each Supplier is responsible for compliance with the standards set out in this Code of Conduct throughout its operations and throughout its entire supply chain.

Supplier shall comply with this Code of Conduct in:

- all of its facilities; and
- all of its operations, including with respect to manufacturing, distribution, packaging, sales, marketing, product safety and certification, intellectual property, labor, immigration, health, worker safety, and the environment.

Supplier is responsible for compliance with this Code of Conduct by all of its suppliers, vendors, agents, and subcontractors.

Compliance

Supplier must maintain the highest ethical standards and comply with all applicable laws, rules and regulations. Toward that end, Supplier must comply with all the following:

Slavery and Human Trafficking

All labor must be voluntary. Supplier shall not support or engage in slavery or human trafficking in any part of its supply chain. Supplier shall implement and maintain a reliable system to verify the eligibility of all workers, including age eligibility and legal status of foreign workers.

No Discrimination, Abuse, or Harassment

Supplier shall not discriminate in hiring, compensation, training, advancement or promotion, termination, retirement, or any other employment practice based on race, color, national origin, gender, gender identity, sexual orientation, military status, religion, age, marital or pregnancy status, disability, or any other characteristic other than the worker's ability to perform the job. Supplier shall not subject workers to physical, verbal, sexual, or psychological abuse or harassment and shall comply with all applicable laws on harassment and abuse of employees.

Work Hours and Wages

Supplier shall comply with all applicable laws addressing work hours and overtime, as well as all applicable laws addressing wages and benefits.

Health and Safety

Supplier shall provide a safe and healthy workplace for employees, including appropriate controls, training, work procedures and personal protective equipment, and shall comply with all applicable workplace health and safety laws.

SUPPLIER CODE OF CONDUCT

Environmental Protection

Supplier shall operate its facilities in compliance with all environmental laws, including laws and international treaties relating to waste generation and disposal, emissions, discharges, and hazardous and toxic material handling. Supplier must ensure that the goods that it manufactures (including the inputs and components that it incorporates into its goods) comply with all environmental laws and treaties.

Gifts and Entertainment

Supplier must not offer cash to any employee of RBCA or Supplier's suppliers, vendors, agents or subcontractors. Supplier must not provide gifts or entertainment to any such employee in those cases where such gift or entertainment is being provided in order to influence such employee's actions, or where acceptance of such gift or entertainment could create the appearance of a conflict of interest.

No Bribery

Supplier has adopted and maintains adequate policies, procedures and controls to ensure that Supplier is in compliance with the Foreign Corrupt Practices Act (15 U.S.C. § 78dd-1, et seq.) and all other local or otherwise applicable laws prohibiting bribery of government officials.

Insider Trading

Supplier and its personnel must not use material, non-publicly disclosed information obtained in the course of their business relationship with RBCA as the basis for trading or for enabling others to trade in the stock or securities of our parent company, RBC Bearings Incorporated, or those of any other company.

Compliance with Laws

Supplier shall comply with all applicable national and local laws and regulations. Where this Code of Conduct requires Supplier to meet a higher standard than set out by law or regulation, Supplier shall meet such higher standards.

Report Violations

Supplier shall self-report any violations of this Code of Conduct. Violations and concerns may be reported by calling 866-247-5449.

Supplier shall not retaliate or take disciplinary action against any worker who has, in good faith, reported violations or questionable behavior, or who has sought advice regarding this Code of Conduct.

Termination

RBCA may immediately terminate its business relationship (including any purchase order(s) and purchase contracts) with Supplier if Supplier or any of its vendors, agents, or subcontractors fail to comply with this Code of Conduct in any manner.