



Purpose and Scope

At Busche, we believe acting ethically and responsibly is not only the right thing to do, but also the right thing to do for our business. Busche has developed this Supplier Code of Conduct (“**Supplier Code**”) to clarify our expectations in the areas of business integrity, labor practices, associate health and safety, and environmental management. Busche’s Supplier Code is intended to complement the company’s other policies and procedures.

Suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do business with Busche are expected to follow this Supplier Code.

Business Conduct Principles

Busche expects its suppliers to conduct business responsibly, with integrity, honesty, and transparency, and to adhere to the following principles:

- 1. Maintain awareness of and comply with all applicable laws and regulations.**
- 2. Compete fairly for Busche’s business, without paying bribes, kickbacks or giving anything of value to secure an improper advantage.**

Busche is committed to conducting business legally and ethically within the framework of a free enterprise system. Corrupt arrangements with customers, suppliers, government officials, or other third parties are strictly prohibited. “Corruption” generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means.

- 3. Observe Busche’s policies regarding gifts, gratuities, and conflicts of interest when dealing with Busche employees.**

Busche suppliers are prohibited from providing or offering gifts to Busche employees of more than nominal value as such gifts could inappropriately influence Busche’s business decisions or gain an unfair advantage. To avoid

any doubt, Busche employees must ordinarily decline offers of gifts, gratuities, favors, travel, or entertainment.

- 4. Encourage a diverse workforce and provide a workplace free from discrimination, harassment or any other form of abuse.**

Busche suppliers shall create a work environment in which employees and business partners feel valued and respected for their contributions. Harassment, including unwelcome verbal, visual, physical, or other conduct of any kind that creates an intimidating, offensive or hostile work environment will not be tolerated. Employment decisions must be based on qualifications, skills, performance, and experience.

- 5. Treat employees fairly, including with respect to wages, working hours and benefits.**

Busche suppliers shall comply with all applicable legal and regulatory requirements and will generally apply sound employee relations practices. Working hours, wages, benefits will be consistent with laws and industry standards, including those pertaining to minimum wages, overtime, other elements of compensation, and legally mandated benefits.

- 6. Prohibit all forms of forced or compulsory labor.**

Busche suppliers shall maintain and promote fundamental human rights. Employment decisions will be based on free choice and there may be no coerced or prison labor, and no use of physical punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse as a method of discipline or control.



7. Prohibit use of child labor.

Suppliers shall adhere to the minimum employment age limit defined by law or regulation. In no instance shall a supplier permit children to perform work that exposes them to undue physical risks that can harm physical, mental, or emotional development or improperly interfere with their schooling needs.

8. Respect employees' right to join or refrain from joining associations and worker organizations, consistent with the law.

9. Provide safe and healthy working conditions.

Busche suppliers shall proactively manage health and safety risks to provide an incident-free environment where occupational injuries and illnesses are prevented. Suppliers must implement management systems and controls that identify hazards and assess and control risk related to their specific industry. Also, suppliers shall provide potable drinking water and adequate restrooms; fire exits and essential fire safety equipment; emergency aid kits and access to emergency response including environmental, fire and medical.

10. Carry out operations with care for the environment and comply with all applicable environmental laws and regulations.

The potential environmental impacts of daily business decision-making processes should be considered along with opportunities for conservation of natural resources, recycling, source reduction and pollution control to ensure cleaner air and water and to reduce landfill wastes.

11. Maintain accurate financial books and business records in accordance with all applicable legal and regulatory requirements and accepted accounting practices.

12. Deliver products and services in a timely fashion meeting applicable quality standards.

Busche is committed to providing high quality products and services. In this regard, Busche suppliers are expected to:

- Know and comply with product quality standards, policies, specifications, and procedures.
- Meet agreed upon milestones, timelines, and deadlines.
- Comply with all applicable federal, state, and local laws and regulations.
- Report issues immediately to Busche that could negatively affect the quality or public perception of Busche or a product or service Busche provides.

13. Support compliance with the Supplier Code by establishing appropriate management processes and cooperating with reasonable assessment processes requested by Busche.

To conduct business with Busche, suppliers must agree to comply with the Supplier Code. With prior notice, Busche may conduct reasonable audits to verify Supplier's compliance with the Supplier Code.

14. Report suspected violations of the Code.

Suppliers may report suspected violations of this Code to Busche's President at (260) 636-7030.

APPROVED BUSCHE LEGAL

By:  DATE: 2/17/2017