

Message from Turtle Leadership:

Dear Supplier/Vendor:

The Supplier Code of Conduct (“Supplier Code”) outlines our clear expectations for the principles we expect our suppliers to adhere to in conducting business. We have a responsibility to our shareholders, employees, and business partners to be clear on our expectations in several key areas:

- Safety
- Environment
- Diversity
- Legal Compliance
- Business Gifts
- Conflicts of Interest
- Sustainability
- Human Rights

This Supplier Code supports Turtle’s process for identifying suppliers that demonstrate a firm commitment to safety, ethics, diversity, the environment and continuous improvement. We strive to utilize only those suppliers who can adhere to the Supplier Code and who can provide us with world class goods and services with the optimal cost of ownership, best on time delivery, shortest lead-time, exceptional quality, unique capability, and a high level of customer responsiveness.

We are committed to providing a solid basis for our relationship built on the principles of law, fairness, mutual benefit, and efficiency. As such, Turtle expects suppliers to follow a strict code of conduct based on compliance with all applicable laws and regulations with respect to conducting business. These expectations must also be followed by our suppliers’ employees and sub-tier suppliers.

Supplier Code of Conduct

Overview

Turtle requires all employees, officers and directors to act responsibly, professionally, and ethically in all business relationships. To that end, Turtle has adopted a formal Business Ethics Code of Conduct. This Supplier Code of Conduct builds on the principles set forth therein and sets forth Turtle's expectations as to the conduct of its suppliers.

Key principles include the following: complying with all applicable laws, rules, and company policies; avoiding actual and apparent conflicts of interest; maintaining confidentiality of non-public information; keeping accurate records; dealing fairly with the competition and business partners; continually striving to maintain a discrimination and harassment free environment; and mandatory reporting of violations of these Codes.

Turtle's Expectations and Commitment

Suppliers are central to Turtle's value proposition. We expect our suppliers to evolve to fit our enterprise. Suppliers that cannot or will not adhere to this Supplier Code may be disqualified as a Turtle supplier.

Compliance with Laws, Rules and Regulations:

Suppliers must comply with all applicable laws, rules, and regulations of the places where they do business. If any law, rule, or regulation conflicts with this Supplier Code, the Supplier should bring such conflict to the attention of Turtle. Suppliers should avoid causing any adverse effect on the human rights of people in the organizations we deal with, the local and wider environments, and the well-being of society at large. Corruption, extortion, and embezzlement, in any form, are strictly prohibited.

Suppliers shall not violate the Foreign Corrupt Practices Act (FCPA), any international anti-corruption conventions, and applicable anticorruption laws and regulations of the countries in which they operate, and shall not engage in corruption, extortion, or embezzlement in any form. Suppliers shall not offer or accept bribes or other means to obtain an undue or improper advantage. Suppliers must uphold fair business standards in advertising, sales, and competition. In addition, Suppliers should:

- Understand and follow applicable international trade control laws and regulations, including those relating to economic sanctions, customs requirements, and export controls.
- Ensure that all transactions are screened in accordance with applicable export/import requirements.

- Never participate in boycotts or other restrictive trade practices prohibited or penalized under United States laws.
- Not perform any act, which would undermine Turtle's commitment to conducting its business in an open, vigorous, and competitive fashion.
- Predicate all purchases and sales between Turtle and its Suppliers strictly on considerations of efficiency, price, quality, technical capability, service, and suitability.

Supplier Diversity: As part of Turtle's business strategy and strategic priorities, Turtle intends to diversify its supply base. Our focus is developing a supply chain that reflects the diversity of the communities in which we and our customers work. Developing mutually beneficial business relationships that produce value to our company and our customers is paramount. We encourage our suppliers to identify, develop, and engage with qualified, capable, and certified minority, women and small disadvantaged businesses. Our customer base includes entities that require this as a condition of doing business and therefore Turtle expects suppliers to be aware of and to promote Supplier Diversity wherever feasible. Turtle may require evidence from suppliers as to the nature, scope, maturity and success of their Supplier Diversity initiatives.

Health, Safety, and Environment: Suppliers must be committed to provide safe working conditions and a healthy work environment. Suppliers must act with care and respect for both the environment and the people who live in the communities where they conduct business. Suppliers must follow all applicable safety, health and environment laws, regulations, rules and practices, including providing a workplace free from violence and the influence of illegal drugs or alcohol. Suppliers must be prepared to provide Turtle with such information as may be necessary or reasonably desirable to comply with government regulations and or specific customer requirements related to material safety such as Safety Data Sheets and other documentation. These items allow Turtle to comply with government regulations such as the US's Federal Hazard Communication Standard and the EU's regulations for RoHS and REACH.

Sustainability: Suppliers are encouraged to examine their sustainability efforts by adopting formal policies, assessing environment impact, and adopting processes and best practices which:

- reduce emissions of CO₂, methane and other greenhouse gases, as well as other relevant factors impacting climate change by implementing management, operational and technical controls to minimize the release of harmful emissions into the environment
- reduce hazardous discharges and other adverse environmental impacts associated with their business processes and activities
- reduce waste streams and encourage recycling

- improve efficiencies in the use of finite or scarce resources such as energy, water and raw materials
- protect biodiversity
- reduce noise, water and ground pollution

Labor and Human Rights: Suppliers must refrain from all forms of unlawful discrimination and harassment in the conduct of its business. Suppliers shall never be influenced in their advice, decisions, actions, or recommendations by issues of race, color, creed, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership, or marital status in hiring and employment practices such as promoting, rewards, and access to training. Examples of prohibited discrimination and harassment include making derogatory comments based on racial or ethnic characteristics, age, or sex, creating a hostile work environment and engaging in unwelcome sexual advances and similar behaviors. Suppliers must uphold the human rights of workers, and treat their employees with dignity and respect as understood by the international community. Suppliers shall not traffic in persons or use any form of slave, forced, bonded, indentured, or prison labor. This includes the transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. All work must be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice. Child labor is strictly prohibited and Suppliers shall not employ children.

Business Entertainment and Gifts: Suppliers may use lawful, legitimate and reasonable business entertainment and gifts for the purpose of creating goodwill and sound working relationships, but not to gain unfair advantage. Depending upon circumstances, Suppliers that provide business entertainment or gifts deemed inappropriate may be disqualified as a Turtle supplier. No Turtle employee or family member may offer, give, or accept any gift or entertainment unless it:

- Is a non cash gift
- Is consistent with customary business practices
- Is not excessive in value
- Cannot be construed as a bribe or payoff
- Does not violate any laws or regulations

Examples of violations: Supplier sends a buyer a \$500 gift card at the holidays. Supplier offers to fly SCM leader and buyer to its facility on private jet at no cost to Turtle. Consultant offers Turtle senior staff court side seats at a professional basketball playoff game.

Conflicts of Interest: Suppliers and their employees must avoid creating actual or apparent conflicts of interest. Conflicts of interest can arise when a supplier takes an action or has an interest that may make it difficult for the supplier to engage in legitimate business transactions. Conflicts of interest also arise when a

supplier, a supplier's employee, or a member of his or her family, attempts to obtain improper access to Turtle or personal benefits (including loans, guarantees of obligations or acquisitions of interests in transactions involving Turtle or its employees, customers or suppliers) as a result of his or her position with the Supplier. If you believe that a transaction, relationship, or other circumstance creates or may create a conflict of interest, you should promptly report this concern to Turtle.

An example of a conflict of interest is conduct which results in the supplier competing against Turtle in any business activity, a supplier causing a Turtle employee to misuse Turtle's resources, or conduct which influences a Turtle employee to take action not in the best interests of Turtle that such employee otherwise would have avoided.

Case example: Supplier sales manager has and maintains an undisclosed familial relationship with a Turtle employee who has decision making power.

Potential conflict of interest may be reviewed for advance clearance by Turtle's Sr. Vice President, Supply Chain Management, and to the extent a potential conflict involves a company officer, then by Turtle's Chief Executive Officer.

Record-Keeping: Suppliers must accurately record and report information in order to make responsible business decisions. All business expenses should be documented accurately and books, records, accounts, and financial statements should be maintained in reasonable detail, appropriately reflect transactions with Turtle, and conform both to applicable legal requirements and to its system of internal controls. Suppliers shall make such books, records, accounts and financial statements available to Turtle upon Turtle's request.

Competition and Fair Dealing: Suppliers must deal fairly with Turtle's customers, suppliers, competitors and employees. Suppliers must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information or any other unfair practice.

Suppliers must not engage in unethical or illegal business practices such as stealing proprietary information, misrepresenting important facts, possessing or using trade secret information that was obtained without the owner's consent, or inducing disclosure of this type of information by past or present employees of other companies.

Confidentiality: Suppliers must strictly adhere to all confidentiality obligations. Confidential information includes proprietary information such as trade secrets, business and marketing plans, sales forecasts, engineering and manufacturing ideas, designs, innovations, databases, records, supply chain information, salary information, and unpublished financial data and reports, as well as any non-public

information that might be of use to competitors or harmful to Turtle or its customers if disclosed. Suppliers must ensure that confidentiality continues even after the Supplier/Customer relationship ends.

Import/Export Customs Controls: Suppliers must comply with all applicable import and export laws, regulations and requirements for those countries where they are conducting business. It shall be the Suppliers' responsibility to provide accurate information and documentation upon request for all applicable shipments.

Specific requirements will be identified in purchase orders issued by Turtle. Acceptance of a purchase order assumes that the supplier understands and accepts responsibility to provide the requested information and or comply with the applicable laws and regulations, which may include, but not be limited to, areas such as:

- Product Classification (HTS and ECCN or Dual Use)
- Country of Origin marking
- Certificates of Origin, including Free Trade Agreement Certificates
- Advance Cargo Security Filings (e.g. ISF, or similar)

In addition, the Dodd-Frank Wall Street Reform and Consumer Protection Act established certain disclosure requirements associated with the importation and distribution of certain minerals ("Conflict Minerals") originating from the Democratic Republic of the Congo, Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia. The Conflict Minerals include tin, tantalum, tungsten, gold, columbite-tantalite, cassiterite, wolframite, and any other material, or their respective derivatives, determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo. It will be presumed that all products and goods supplied by Suppliers to Turtle do NOT include any Conflict Minerals unless and until the Suppliers specifically notify Turtle in writing to the contrary. Such written notice from Suppliers to Turtle shall (i) be issued immediately upon Suppliers learning of the existence of Conflict Minerals in any products or goods supplied by Suppliers to Turtle and (ii) identify the specific products or goods sold to Turtle incorporating such Conflict Minerals and the particular Conflict Minerals in issue.

Payments to Government Personnel: Suppliers must at all times comply with the US Foreign Corrupt Practices Act and all other applicable laws related to preventing bribery (ex. UK Bribery Act). Specifically, Suppliers may not give, promise to give, or offer to give, anything of value, directly or indirectly, to governmental officials, political candidates, or political parties in order to obtain or retain business. Commercial bribery or kickbacks are also strictly prohibited.

Reports of Illegal or Unethical Behavior: Suppliers are required to report to Turtle any behavior which may reasonably be viewed as contrary to this Supplier Code. Suppliers should report concerns to its Turtle SCM contact and

or the SCM Leadership Team. If contacting SCM is not a viable solution, then the Turtle Ethics Hotline (800-634-3364) may be used to report inappropriate behavior. This tool should not be used to report commercial or legal disputes involving Suppliers and Turtle. Suppliers should resolve all such issues pursuant to the terms and conditions in the applicable agreement.

To the extent possible, Turtle will keep all reports made in confidence as confidential and will not allow retaliation for good faith reports of possible misconduct by others. Suppliers shall cooperate in investigations of alleged misconduct.

Examples:

- 1) Turtle employee asks for money and/or gifts in exchange for awarding business. This should be reported.
- 2) Turtle employee offers personnel of supplier favors in exchange for preferred pricing. This should be reported.
- 3) Employee of supplier shares Turtle's blueprints with a Turtle competitor. This should be reported.
- 4) Supplier has an dispute with Turtle concerning an issue with late payment of an invoice. This situation should be handled pursuant to the terms and conditions in the applicable agreement (e.g. Purchase Order terms and conditions).

Management of Sub-Suppliers: Suppliers must manage their sub-tier suppliers in accordance with the same principles outlined in this Supplier Code of Conduct.

Turtle's Commitment to Suppliers:

Turtle promises to adhere to its own Business Ethics Code of Conduct in its dealings with suppliers. Please note that suppliers should not accept verbal requests as authorized orders to provide goods and or services. A formal supplier agreement, purchase order and/or letter of intent signed by an authorized Turtle representative must be sent for goods and/or services.

For those suppliers who meet the high standards required to become a Turtle supplier, Turtle requests your cooperation to mutually hold each other accountable. Turtle wants to be recognized as your customer of choice and welcomes open and honest feedback.