



Code of Ethics

Igloo Products Corporation is committed to the highest standards of ethics and business conduct. This encompasses our relationships with our customers, our suppliers, our competitors, the communities in which we operate, and among our employees at every organizations level.

Our Customers

We will provide high quality and value, competitive prices, and honest transactions to those who use our products and services. We will deal lawfully and ethically with our customers

Our Employees

We will treat employees fairly and use employment practices based on equal opportunity for all employees. We will respect the interests of employees in privacy and treat employees with dignity and respect. We are committed to providing safe and healthy working conditions and an atmosphere of open communication for all our employees.

Our Suppliers and Partners

We will deal fairly with our suppliers and partners. We will seek long-lasting business relationships, without discrimination or deception.

Our Competitors

We will compete vigorously, independently and fairly, basing our efforts on the merits of our competitive offerings.

Our Communities



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We will be a responsible corporate citizen of the communities worldwide in which we operate. We will abide by all national and local laws, and we will strive to improve the well-being of our communities through the protection of natural resources, through the encouragement of employee participation in civic and charitable affairs, and through corporate philanthropy.

Our Standards of Conduct –

The following standard of conduct defines our minimum expectations for ethical behavior. Because these standards cannot anticipate the particular facts of every situation, they must be interpreted and applied within the framework of the laws and mores of the jurisdictions in which we operate, as well as in good common sense. Reasons such “everyone does it” or “it’s not illegal” are unacceptable excuses for violating these Standards. We must be mindful of avoiding at all times, on and off the job, circumstances and actions that give even the appearance of impropriety or wrongdoing which could discredit Igloo.

- We design, manufacture, and service our products so that the rest of the world can depend on them.
- We compete on the merits.
- We sell our products and services honestly.
- We keep accurate and complete records.
- We treat each other fairly and with respect.
- We relentlessly pursue workplace safety.
- We appropriately use and protect information.
- We treat suppliers fairly and with respect
- We honor the Code as more than a set of rules. It is a guide that helps us deliver on our Commitments.
- We obey the law, perform in good faith, communicate openly, and seek fair outcomes.
- We ask questions, raise concerns, and call attention to problems.
- We build trust, show respect, and perform with integrity.



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1. Quality & Safety

Igloo products must be designed, produced and delivered with the primary consideration of the safety and health of our customers, product users, employees, and others who may be affected. Igloo operating units have the responsibility to design, manufacture, and deliver quality products. All required inspection and testing operations must be completed properly.

2. Marketing

Igloo will compete in the global marketplace on the basis of the merits of our products. We will sell our products honestly and will not pursue any sale that requires us to act unlawfully or in violation of these standards. In making comparisons to competitors, care must be taken to avoid disparaging a competitor through inaccurate statements. All persons acting on behalf of Igloo will abide by the laws relating to improper payments.

3. Business Gifts

A gift is never permitted if intended in exchange for favorable treatment or if prohibited by the policies of the recipient or his/her employer. Igloo will not offer or pay any bribe.

Gifts

Accepting token gifts of nominal value from established suppliers is permitted on an occasional basis. This includes promotional items with company logos such as hats, pens, shirts, etc. or seasonal gifts such as fruit baskets, hams, etc. Gifts should not exceed \$25 in value.

Accepting gifts, entertainment or favors of any kind from potential suppliers or those who have pending agreements with Igloo is prohibited. Any type of behavior that could influence, or appear to influence purchasing decisions may be considered grounds for disqualifying the supplier.

Solicitation of gifts from established or potential suppliers is prohibited.

Entertainment

Entertainment events hosted by representatives of established suppliers for the purpose of discussing business are common practice for establishing good rapport and strong relationships among key suppliers and are considered acceptable. This includes meals, sporting events and other recreational outings. Entertainment events and meals must be approved by Igloo management. Good moral judgment should be used at all times with regard to the venue.

Acceptance of social invitations will be subject to prudent judgment as to whether: the invitation places the recipient under any obligation, the appropriateness of the occasion, frequency and choice of facilities.

3. Protecting Information Belonging to Others



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Igloo respects the legitimate proprietary rights and trade secrets of our customers, suppliers, and third parties. Igloo will solicit, accept, use and disclose proprietary information belonging to others only in conformity with Igloo's Confidentiality Agreement.