



SUPPLIER CODE OF CONDUCT

At Lawson Products, Inc. ("Lawson Products"), we have built strong relationships with our customers by earning their trust with our commitment to ethical behavior. To maintain this trust, we require our contractors, consultants and suppliers and their employees, subsidiaries, affiliates and subcontractors (collectively, "Suppliers") to operate in accordance with this Supplier Code of Conduct ("Code") and in compliance with all applicable laws and regulations. This Code outlines Lawson Products' expectations for Supplier conduct regarding labor and human rights, health and safety, the environment and ethics.

A. Labor and Human Rights

- Non-Discrimination. Supplier shall not discriminate against any worker in hiring or other employment practices, based on race, age, disability, marital status, ethnicity, pregnancy, national origin, religion, sexual orientation or any other factors protected by applicable law.
- Non-Harassment. Supplier shall maintain a workplace free of verbal, physical, sexual or psychological abuse or harassment.
- Forced Labor, Human Trafficking and Slavery. Supplier shall ensure that it will not use forced, bonded, indentured, and involuntary or prison labor and will not engage in slavery or trafficking of any persons. Supplier shall not retain a worker's government-issued identification, passport or work permit as a condition of employment and shall allow workers to resign from their positions at any time.
- Child Labor. Supplier shall only employ workers who are at least 15 year of age or the applicable minimum legal age, whichever is higher.
- Working Hours. Supplier shall comply with all applicable work hours and overtime laws.
- Wages and Benefits. Supplier must have a system in place to verify and accurately record payroll, deductions and hours worked by legally authorized workers. Supplier must comply with all applicable wage and compensation requirements as defined under applicable labor laws for regular work, overtime, maximum hours, piece rates and other elements of compensation and employee benefits.
- Freedom of Association. Supplier shall comply with all applicable laws on freedom of association and collective bargaining without interference.



B. Health and Safety

- Supplier shall provide safe and healthy working and housing environments (if Supplier provides housing) to prevent accidents and injury to health. Supplier shall minimize worker exposure to potential safety hazards by identifying, assessing and minimizing risks by developing plans and procedures for hazard elimination, safety training, emergency preparedness and incident management.

C. Environment. Supplier shall be sensitive to its impact on the environment, including but not limited to air emissions, water discharge, hazardous waste handling and non-hazardous waste recycling and disposal. Supplier shall comply with applicable environmental laws and regulations within its facilities, obtain all required environmental permits and use care when handling hazardous materials to prevent unplanned releases into the environment. Supplier will adhere to all applicable laws and regulations regarding prohibition of specific substances in its products and will include all required product labeling for recycling and disposal.

D. Ethics.

- Anti —Bribery and Anti-Corruption. Supplier shall have a written zero tolerance policy prohibiting the offer or acceptance, directly or through third parties, of any bribes, kickbacks, illegal political contributions or other improper payments to any customer, government official or third party with the intention of obtaining or retaining a business or other improper advantage. There is no exception for small amounts or for any act which might cast an appearance of improper conduct on Lawson Products.
- Gifts. Supplier shall not give, gift or donate on behalf of, or for the benefit of, any Lawson Products employee or representative, anything of value whether in cash or in kind (for example, sports or other event tickets, or outings, meals, or any other kind of entertainment, gifts, free products, etc.) without prior written notice to and approval from the President or General Counsel of Lawson Products. Gifts of nominal value such as those permitted under the "Lawson Code of Conduct for Employees" are permitted.

Lawson Products appreciates your on-going support and commitment to conducting business responsibly. However, if we determine that your efforts to comply with this Code have been deficient and you have failed to cooperate in implementing remedial measures, Lawson Products reserves the right to discontinue purchasing products from you. This Code does not modify or otherwise limit any of Lawson Products' contractual or legal rights.