

Business Requirements Procurement

Workplace Code of Conduct for Access Business Group International LLC, Access Business Group LLC and Access Business Group International BV ("ABG")

ABG and its parent company, Alticor Inc. ("Alticor"), have a long tradition of working in partnership with reputable suppliers who share ABG's and Alticor's commitment to human rights and ethical standards of conduct. Alticor customers depend on the quality and value of Alticor products and the underlying integrity of the workplace that produce them.

To maintain its commitment to these principles, ABG has established a *Workplace Code of Conduct*. ABG requires all suppliers and their subcontractors to adhere to this code of conduct as part of the contracting process, including posting this *Code of Conduct* in the language of the suppliers' workers and providing appropriate training to all workers on their rights within the *Code of Conduct* and the laws of the applicable country. ABG reserves the right to immediately terminate its relationship and to cancel all orders with any supplier that does not fully comply with these standards, in addition to pursuing any other available remedies resulting from a supplier's breach.

The Workplace Code of Conduct requires ABG's suppliers (and the supplier's subcontractors) to:

PROVIDE A CLEAN, SAFE AND HEALTHY WORK ENVIRONMENT

Suppliers and their subcontractors must ensure that the workplace is in compliance with local health and safety laws and regulations and is clean and well lit.

ENGAGE IN FAIR AND ETHICAL EMPLOYMENT PRACTICES

Child Labor: Suppliers and their subcontractors must comply with all applicable child labor laws and regulations in the location where the goods are produced. Children under legal age for employment will not be employed by the supplier.

Wages and Hours: All applicable prevailing local wage and hour requirements must be met. Workers must be paid in accordance with local laws and regulations. Workers must be compensated at a rate at least equal to the prevailing local minimum wage, including piece rate workers.

Discrimination: Suppliers and their subcontractors must comply with local anti-discrimination laws and regulations.

Forced Labor: Every employee must be a voluntary worker. No employees can be made to work against their will or work as forced prison labor. All employees must be treated with respect and no employee will be subject to corporal punishment, harassment or coercion of any type.

ALLOW FULL ACCESS TO FACILITIES AND RECORDS FOR COMPLIANCE INSPECTIONS

Supplier and their subcontractors must make their facilities or records available at all times for inspection by ABG representatives or independent inspection firms retained by ABG.

This Workplace Code of Conduct makes clear ABG's and Alticor's commitment to appropriate working conditions worldwide. ABG believes that suppliers who follow these standards will have a more productive workforce, one capable of meeting Alticor's customer's demand for high quality goods at a fair price. ABG will work only with those suppliers who share ABG's and Alticor's core values and will work to actively maintain these values in the global workplace.

The above terms and conditions will take effect upon date of delivery by ABG and will apply to all ABG purchase orders issued on or after such date. These terms and conditions are in addition to all requirements in any purchase order or other agreement between ABG and a supplier. To the extent any provision of these terms and conditions conflicts with the terms of any purchase order or other agreement, the provisions of the purchase order or other agreement shall prevail.

Revision 8/10/2010 Page 1 of 1