

THE SAFARILAND WAY

Our Values in Action



CODE OF CONDUCT

SAFARILAND.
Together, We Save Lives.®

To contact the Safariland Ethics Helpline use the following number(s):

United States	866-830-5772
Mexico	001-855-312-8681

Or:

<https://safariland.alertline.com>

For reference or more information on the topics and guidelines in this book, our policies are posted on the Intranet:

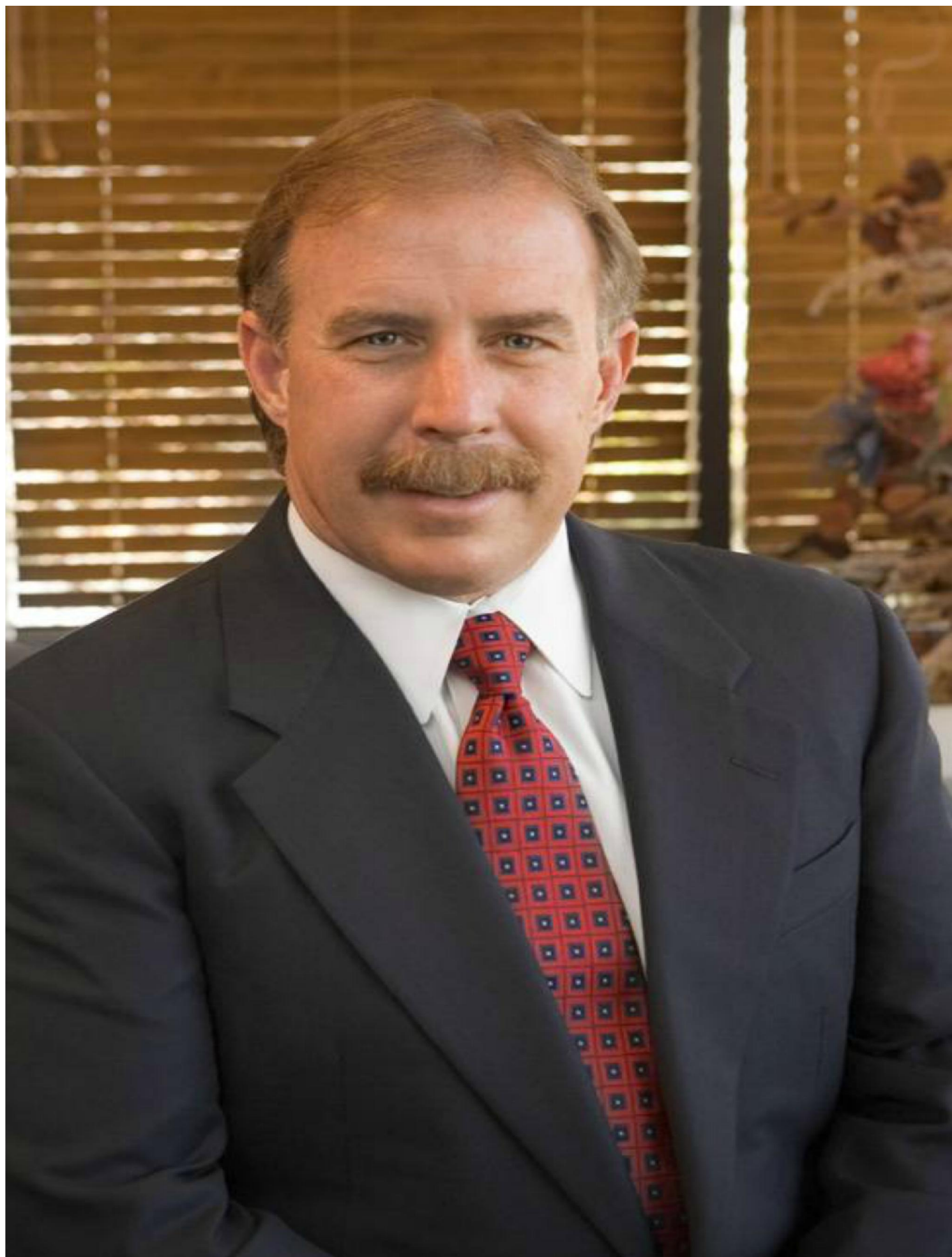
<http://home.safariland.com>

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Dear Colleagues,

At Safariland, our reputation is earned every day by the decisions we make. We each have both the privilege and the responsibility of sustaining and building upon our Company's reputation for excellence. To be successful, we must work together to consistently achieve the right results in the right way.

Each of us must embrace, engage and drive the principles and conduct of our Company values. Our Code of Conduct, *The Safariland Way*, sets forth our standards for business conduct by expressing our uncompromising commitment to integrity by everyone, everyday, everywhere. The principles embodied in our Code of Conduct are to be followed by all of us.

The Safariland Way expresses our passion and commitment to our mission, vision and values. These values are: Focus on the Customer First, Our People are the Difference, Safety is How we Live, Achieve the Right Results the Right Way and Make Fact-Based Decisions.

Working together, we solidify the foundation and passion that promises a continuation of the legacy of our Company for years to come.

Together, We Save Lives.

A handwritten signature in black ink, appearing to read 'Scott O'Brien', with a stylized flourish at the end.

Scott O'Brien
President, Safariland

MISSION:

Together, We Save Lives.

VISION:

To be the premier protective equipment and solutions provider to the public safety market.

VALUES:

- Focus on the Customer First
- Our People Are the Difference
- Safety is How We Live
- Achieve the Right Results in the Right Way
- Make Fact-Based Decisions

About *The Safariland Way*

The Safariland Way is about our culture and values, which are the foundation for everything we do. Maintaining an ethical culture – a culture of abiding by the law, complying with Company policies, and behaving ethically in the way we conduct our business – is the basis of these values. How we do business is as important as what business we do. This Code of Conduct reinforces our values and sets expectations for how we operate our business, interact with each other, and work with customers, suppliers and other business partners. This Code of Conduct serves as a guide to assist each of us in making decisions that reflect our Values in Action.

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About The Safariland Way

OUR RESPONSIBILITIES

We all have a personal responsibility to follow this Code of Conduct and other Company policies, procedures and guidelines. Our success depends on us maintaining our corporate reputation. Each of us has an important role to play in maintaining that reputation. Behaving ethically is an essential part of working for Safariland. It is fundamental to how we do business and is vitally important to the reputation and success of our Company.

MANAGERS AND SUPERVISORS

Our managers and supervisors have a special duty to foster a culture of integrity and compliance. This means that managers and supervisors should serve as role models for integrity and compliance in all their interactions. Managers and supervisors must ensure that employees understand their responsibilities and encourage an environment where employees feel comfortable raising questions and concerns without any fear of retaliation. This also means that managers and supervisors will address any concerns or questions in a professional and timely manner, and offer appropriate guidance that does not compromise our standards of integrity and compliance to obtain business results.

VIOLATIONS

Employees who violate the Code of Conduct or Company policies are subject to disciplinary action up to and including termination of employment. Violations of the Code of Conduct also include requesting or encouraging others to violate the Code of Conduct or Company policies, as well as failing to promptly raise known or suspected violations.



SEEKING ASSISTANCE, RAISING CONCERNS AND REPORTING MISCONDUCT

The Code of Conduct and Company policies provide guidance to employees to ensure that business is conducted in an ethical manner. However, there may be times in which employees need additional assistance to make the right decision. Generally, managers and supervisors will be in the best position to resolve a concern. If a manager or supervisor is unavailable or cannot address the matter, or if the employee is not comfortable discussing the matter with the manager or supervisor, the following resources are also available:

- Employee's functional or site leadership
- The Human Resources department
- The Ethics Office
- The Legal & Compliance department

The Company has an Ethics Helpline to also assist employees in reporting concerns about suspected misconduct. The Ethics Helpline consists of a toll-free telephone line and online reporting services that are provided by an independent third party. This service is available 24 hours-a-day / 7 days-a-week to employees everywhere and is capable of receiving reports in many languages. Employees are encouraged to provide their name and contact information to ensure that appropriate action and follow up can occur, but employees may choose to remain anonymous.

Reports of misconduct must always be made in good faith, which means that the employee has reason to believe that the information reported is truthful. Company resources should never be used to make intentionally false or misleading reports. Like other misconduct, intentionally filing bad faith reports may result in disciplinary action. All reports of misconduct will be handled promptly, professionally and with the highest degree of confidentiality possible.

Additional information about the Ethics Office and Helpline is available on the Accountability section on page 48.

NON-RETALIATION

The Company encourages an environment where concerns and potential misconduct are brought forward. It is important that employees feel comfortable raising questions. Safariland will not tolerate retaliation against anyone who, in good faith, raises a concern, reports a potential misconduct, or provides information related to an investigation. We thank and support the courage of employees to bring forward issues and concerns so that problems can be detected and addressed at the earliest possible stage.



Focus on the Customer First

At Safariland, we understand that the best products and ideas come from focusing on the customer. When we open our minds and ask the very simple question “what does my customer really want,” we find the answer yields more promise and more opportunities to improve and excel. This section is dedicated to key topics that help us focus on our dealings with our customers in a manner keeping with our principles, policies and guidelines.

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ANTI-CORRUPTION

We are committed to complying fully with anti-corruption laws, including the U.S. Foreign Corrupt Practices Act. We must never offer, give or receive any bribes or kickbacks. An improper payment, whether directly or through a third party, to gain a business advantage in any situation is never acceptable. Payments made to a government official to facilitate approval of some type of business transaction or activity, known as “facilitating” or “grease” payments are also prohibited. Employees are responsible for understanding the circumstances under which payments of expenses (such as gifts, hospitality and travel) are made and confirming that such payments are permissible under Company policy and applicable laws.

GIFTS AND HOSPITALITY

Gifts and hospitality can serve legitimate business purposes, like creating goodwill and building business relationships. Gifts of nominal value or reasonable meals and entertainment directly related to Safariland business are appropriate business courtesies. Yet, they can also create a real or perceived conflict of interest. There may also be significant legal restrictions regarding gifts and hospitality when dealing with government officials. Employees must make sure to fully understand any such restrictions, applicable laws and Company policies or procedures before offering any gift or hospitality.

WHAT TO DO

Before offering or giving gifts, entertainment or reimbursement of customer travel expenses, make sure you understand the recipient's rules and regulations that may limit the receipt of such business courtesy.

Always follow applicable legal requirements and Safariland policies and guidelines.

Make sure gifts or entertainment are not lavish, extravagant or extraordinary.

Make sure records of such expenditures accurately reflect the true nature of the transaction.

WHAT NOT TO DO

Never offer a business courtesy, such as a gift, contribution or entertainment, under circumstances that might create the appearance of impropriety.

Never offer, promise, pay or authorize anything of value (such as money, goods or services) to a government official or employee of a customer to obtain or retain an improper advantage.

Never give a gratuity or other payment to government officials or employees to expedite a routine administrative action without fully disclosing it to our Legal & Compliance department in advance.

CHARITABLE GIVING / SPONSORSHIPS

As a Company whose mission is “Together, We Save Lives”, we support, sponsor and contribute to other organizations that have a similar mission to ours. Giving charitable contributions or sponsorships to organizations that share our values and business objectives not only helps us to accomplish our own mission, it also helps to enhance the reputation of our Company. While there may be many worthy organizations, we must ensure that the use of Company funds for charitable giving and sponsorships is strategically coordinated and authorized by management.

WHAT TO DO

Charitable contributions should only be made to U.S. designated 501(c)3 organizations.

Look for charities and good causes that focus on improving the health, welfare or lives of our core customers: members of law enforcement, the military, private security, and their respective families.

Before making any commitments on behalf of the Company, all requests for sponsorship and charitable donations must be referred to the Communications Department to ensure that they meet our sponsorship and charitable giving criteria.

Before making any commitments to organizations outside of the United States, seek guidance and approval from the Legal & Compliance department.

WHAT NOT TO DO

Do not support your personal community activities on Company time, or with Company resources.

Do not represent Safariland in any public process or forum unless specifically asked to do so by management.

Do not dedicate Company funds or resources to third parties that are raising money for charitable organizations. Our strategy is to give funds directly to charitable organizations designated as 501(c)3 organizations. If you want to support the third parties' efforts on behalf of a charity you believe in, you can personally support them as a private individual.

COMPETITION AND ANTITRUST

Safariland is committed to competing in the marketplace in a fair and honest manner. Competition and antitrust laws seek to protect free enterprise by prohibiting practices like price-fixing, market-sharing, bid-rigging, or behaviors aimed at establishing or maintaining a monopoly. These laws can be complex and may vary across jurisdictions or countries. While the laws apply to every level of business, it is especially important that our sales and marketing professionals ensure compliance with antitrust laws in making pricing or bidding decisions, dealing with customers and interacting with competitors.

WHAT TO DO

Comply with all applicable competition laws and regulations.

Review and understand our policies and procedures with respect to competition situations, and if you have any questions or issues, bring them to our Legal & Compliance department.

Make all pricing and bidding decision independently from competitors.

WHAT NOT TO DO

Do not propose or enter into agreements or understandings – expressed or implied, formal or informal, written or oral – with any competitor regarding any aspect of competition between Safariland and a competitor.

Avoid contacts of any kind with competitors that could create the appearance of improper agreements or understanding.

Do not discuss any competitively sensitive information with any competitors.

COMPETITIVE INFORMATION

Competitive information is important to enable us to evaluate market or customer demand, develop products and services, and otherwise maintain business success. Safariland is committed to behaving legally and ethically in gathering such competitive information. We must not misappropriate trade secrets or inappropriately obtain competitive information.

WHAT TO DO

We will use only publicly available information, including published articles, market analyses and purchased reports to obtain competitive intelligence.

Observe all laws, rules and regulations that apply to contracting and procurement activities.

WHAT NOT TO DO

We will not seek a competitor's confidential information, or accept anyone else's confidential information without their consent.

We will not use illegal or unethical means (e.g., theft, bribery, misrepresentations or espionage) to obtain competitive information.

We will not knowingly make any untruthful or inaccurate statements, communications or representations when we are bidding or negotiating a contract.

GOVERNMENT CONTRACTS

We conduct business with the U.S. government and often interact with government agencies and officials. Safariland employees and any third-parties involved in supporting these transactions must operate with honesty, integrity and openness, and comply with applicable laws and regulations. Laws and regulations regarding government business are often complex, and serious civil and criminal penalties for violations can be imposed.

WHAT TO DO

We will abide by all applicable laws and regulations related to government procurement activities, particularly special requirements incorporated into the bids or contracts.

We will not knowingly make any untruthful or inaccurate statements, communications or representations.

We will adopt, and adhere to, processes that ensure reports, certifications, and statements are current, accurate and complete.

We will ensure that contract requirements are clearly understood and communicated to the responsible parties in the Company.

WHAT NOT TO DO

Be careful not to make incorrect or unauthorized cost charges.

We are not to deviate from contract requirements, such as failure to perform tests, inspections, packaging, or shipping as required.

We will not make unauthorized contract substitutions.

We must not violate government regulations regarding recruiting and hiring restrictions, or certification procedures.

We must not submit incomplete or inaccurate data or reports when they are required.

INTERNATIONAL TRADE CONTROLS

As a Company engaged in international trade, including export of products and associated technology, import of goods and operation of a manufacturing plant under a free trade zone, we must understand and comply with all applicable laws and regulations to safeguard the reputation of Safariland as a responsible global company.

EXPORTS

We are committed to compliance with all laws and regulations relating to the export of products, services, technology and technical data. These laws apply to many aspects of our operations. Export rules not only apply to shipment of products from the United States, but also apply to the transfer of technical data or technology to non-U.S. persons, including within the U.S. borders. Therefore, employees must understand and ensure compliance with these export laws, including the Arms Export Control Act (AECA) and the International Traffic in Arms Regulations (ITAR), the Export Administration Regulations (EAR) (including prohibitions on participating in foreign boycotts), the Office of Foreign Assets Control Regulations, Bureau of Census – Foreign Trade Division, Federal Firearms Regulations and the Gun Control Act.

Some exports may require a U.S. government issued export license. In addition, employees must advise customers (or other parties) receiving Safariland products or technology/technical data that they are subject to U.S. export control restrictions as to their obligations to comply with applicable U.S. export laws and regulations, including “re-export” controls that may restrict the customer’s ability to further transfer the products or technology to other third parties. In order to avoid any export problems, violations or potential penalties, employees must follow the company policies regarding export controls and consult with the Export Compliance department for guidance.

IMPORTS

Safariland is committed to compliance with U.S. Customs & Border Protection regulations and other applicable laws relating to the import of goods. These regulations also apply to our intra-company transactions between Safariland’s U.S. and Mexico sites. The U.S. Customs & Border Protection rules require the Company to determine the correct classification, value, country of origin and other information for all imports. The Company must also demonstrate, through proper documentation, that it has exercised reasonable care to ensure all imports comply with the laws and regulations. This means that we must report complete, accurate and detailed information to U.S. Customs & Border Protection regarding every imported good.

North American Free Trade Agreement (NAFTA) and the Maquiladora Program

Safariland is committed to compliance with the North American Free Trade Agreement (NAFTA) which provides for the reduction or elimination of duty for a wide variety of products originating within NAFTA territories. NAFTA has specific rules of origin that are different from other import rules of origin. Safariland is responsible for qualification of items for export and import under a NAFTA Certificate of Origin.

Safariland must also maintain compliance with applicable regulations relating to the Mexican Maquiladora Program under which the Company operates its maquila facility in Tijuana. Maquila operations involve the shipment of foreign merchandise into Mexico on a temporary basis for assembly, manufacture or repair and return to the United States. Each of us, whether in Mexico or the United States, must ensure compliance with these laws.

ANTI-BOYCOTT

Many countries have laws that require a company to either refuse or not refuse to do business with another country, its companies or its citizens. U.S. laws generally prohibit U.S. companies and their subsidiaries from cooperating with international boycotts not sanctioned by the U.S. government. For example, the U.S. government requires that U.S. companies not participate in the Arab League's boycott of Israel.

Employees involved in conducting business internationally must ensure compliance with anti-boycott regulations under the U.S. Department of Commerce and the Department of Treasury. Requests to participate or agree to a boycott relating to Israel, its companies or its citizens must be reported immediately to our Legal & Compliance department.

WHAT TO DO

Understand and be aware of applicable international trade controls and applicable laws and regulations.

Follow Company policies and procedures and consult Export Compliance department before working on a program which involves sharing U.S. commodities or technologies with foreign parties.

Enlist the assistance of the Export Compliance department when providing a service to a foreign person, whether in the U.S. or abroad; releasing controlled technology or software to a foreign person in the U.S.; releasing defense articles to a foreign person in the U.S. or its territories or sending / carrying a dual use or defense article or technology out of the U.S. or its territories. All are considered exports and should have the proper authorizations from the Export Compliance department.

Enlist the assistance of Import Compliance regarding any products that are sourced from a foreign supplier. It is important that the correct information is given to U.S. Customs & Border Protection at the time of entry into the United States.

Screen transactions against applicable U.S. rules restricting trade with certain sanctioned countries, persons or entities.

Screen business partners, suppliers and parties involved in international transactions against government watch lists.

Be familiar with the general transaction “red flags” indicating that a customer may be attempting to evade compliance with laws and consult with the Export Compliance department for guidance.

Be aware that requests to participate in unsanctioned boycotts may be made in many methods (such as bids, terms & conditions, instructions, letters of credit, purchase orders, shipping documents and others).

Always exercise reasonable care and due diligence when making NAFTA claims on exported and imported qualifying products. NAFTA certificates of origin and related claim documentation must be maintained as required by law.

WHAT NOT TO DO

Do not assume our vendors are within compliance of import and export controls.

Do not engage in any export or import without consulting with the Export/Import Compliance department to determine what and with whom you may share technology or technical data.

Do not ship controlled commodities, technologies or software to a U.S. or foreign person unless you know for certain the recipient is properly vetted and screened.

Do not assume that an import tariff classification provided by our foreign supplier is accurate. Safariland, as the importer of record, is responsible for choosing the correct tariff number.

Do not assign an import tariff classification without consulting the Import Compliance department.

Do not engage in transactions involving embargoed countries, a citizen of an embargoed country or an individual or entity subject to government sanction.

Do not agree to or provide information for requests to participate in boycott activities that are not sanctioned by the United States.

SUPPLY CHAIN / VENDOR RESPONSIBILITY

At Safariland, our mission statement, “Together, We Save Lives”, also applies to our supply chain. In order to continue to deliver products that protect those who protect us, we require agile, reliable, and competitive suppliers. We believe strong and resilient relationships with our suppliers, at every level, are critical for us to succeed in meeting our customers’ expectations and to continuously improve as a company. We are proud to work with a diverse range of suppliers who adhere to the same high standards to ensure delivery of quality products to our customers.

We require our suppliers to conduct business the same way we do - ethically and with respect to the law. We do not tolerate any form of trafficking in persons (including involuntary servitude or debt bondage), use of forced labor or other unlawful or unethical labor practices. We must be vigilant in guarding against abuse and corruption of any sort.

WHAT TO DO

We encourage our suppliers to adopt the same or similarly high standards of ethical behavior.

We will promptly report – in the same manner we would for a company internal matter – any behavior by a supplier that does not match our ethical standards.

We will protect information in our possession that is proprietary to our suppliers.

We will watch for unsafe conditions or disregard of environmental standards in supplier facilities.

WHAT NOT TO DO

We will not engage in any potential conflicts of interest in supplier selection such as accepting improper gifts, or directing business to a supplier owned or managed by a relative or close friend.

We will not tolerate any form of trafficking in persons or use of forced labor in our suppliers, or suppliers’ employees who appear to be underage or subject to coercion.





Our People are the Difference

We value and respect our people and believe they are contributors to our success. Leadership, integrity and honesty are among the key attributes our people possess and help drive our culture. We are a team, a team who respects each other and works together for the best ideas in life-saving products. The following section provides guidance for how we are to treat each other and provide internal customer service.

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Our People are the Difference

RESPECT FOR PEOPLE

When we respect the diversity of our workplace, we create an inclusive environment where everyone can perform their highest potential. Our Vision can be realized only with the full commitment and cooperative spirit of our diverse workforce. Achieving success for all stakeholders will come only through respecting one another, valuing each other's contributions, and treating everyone fairly. At Safariland, we work as a team, as colleagues, with the same mission for all – Together, We Save Lives.

EQUAL OPPORTUNITY EMPLOYMENT / NON-DISCRIMINATION

We are an equal opportunity employer and comply with all applicable anti-discrimination laws, orders, directives and requirements. As a federal government contractor, Safariland maintains an Affirmative Action Plan (AAP) in compliance with Executive Order 11246.

It is our policy to administer all employment decisions on a nondiscriminatory basis without regard to race, color, religion, gender, national origin, age, disability, marital status, or status as a veteran. This policy extends, and is not limited to, recruitment and employment, promotion, demotion, transfers, layoff and termination, rates of pay and other forms of compensation, education and training, and other working conditions.

NON-HARASSMENT

We are committed to creating a respectful, courteous work environment free of discrimination and harassment. We will not tolerate sexual or other harassment by any employee, distributor, vendor, customer, or visitor. Not only is it a breach of our policy, it may be a violation of state or federal law. In addition to any corrective action we may take, up to and including termination, offenders may also be personally liable for any legal and monetary damages.

Harassment refers to behavior that is personally offensive, intimidating or hostile, impairs morale, and interferes with work performance. We maintain a strict policy prohibiting unlawful harassment or discrimination because of sex, race, color, national origin, ancestry, religion, creed, physical or mental disability, marital status, medical condition, sexual orientation, gender identity, age, or any other basis protected by federal, state, or local law. All such harassment or discrimination is unlawful and will not be tolerated.

WORKPLACE VIOLENCE PREVENTION

Safariland is committed to workplace safety. As part of this commitment, the Company is specifically committed to providing a workplace that is free of threats or acts of violence, harassment, intimidation or other disruptive behavior and in protecting its employees from such conduct on its premises. We will ensure that everyone, including employees, applicants, customers, vendors or contractors and members of the public, never feel threatened verbally, physically, via e-mail or any other method of communication, by any employee, customer, vendor, visitor or contractor. In keeping with this commitment, the Company has established a strict policy that prohibits any employee from behavior that is violent, threatening, or intimidating, while on Company property or on Company business. The Company has zero tolerance for employees, applicants, customers, vendors, visitors or contractors who make threats, engage in threatening behavior, or commit acts of violence against others.

SUBSTANCE ABUSE

We are committed to providing not only a safe workplace but to developing programs that promote high standards of health for its employees. We prohibit the use, possession, manufacture, distribution or sale of any illegal drug or alcoholic substance at all employee work locations.

REPORTING

Safariland encourages that any and all misconduct be reported. Therefore, all employees are responsible for reporting to their managers or supervisors any behaviors that may be threatening, discriminatory, or intimidating. All reports will be taken seriously, investigated and addressed with appropriate corrective action.

WHAT TO DO

When you observe inappropriate or unacceptable behavior, you have an obligation to do something about it. This may include talking to the person involved, discussing the matter with your line manager, seeking specific ethical advice from your local Human Resources or Legal & Compliance department or utilizing the Ethics Helpline.

WHAT NOT TO DO

Avoid conduct and statements that are degrading, offensive, humiliating or intimidating to others. Seemingly innocent actions can create an environment that may be offensive to others.

Our People are the Difference

PROTECTING PERSONAL DATA

We will make sure all personal data is handled appropriately, safeguarding individual privacy and following all relevant company processes and applicable data protection laws and regulations.

We are committed to keeping employees' personal information safe. Safariland will ensure that all personal information is handled in compliance with local procedures, applicable data protection or data privacy laws and regulations within the countries in which we operate. We will respect any legal restrictions on transferring personal data.

WHAT TO DO

Refer any request for employee personal information, including date of birth, employee number, or contact information to the Human Resources or Legal department.

WHAT NOT TO DO

Do not disclose any personal information of current or former employees to customers or vendors.

Do not provide references about current or former employees.

VALUES IN ACTION

Our "Values In Action" program is a recognition program focused on Internal Customer Service which promotes and supports our corporate culture embodied in *The Safariland Way*. This program encourages employees to live out our values in their daily work activities and act as role models for each other.



INTERNAL CUSTOMER SERVICE

It has been demonstrated that employee satisfaction soars when you enhance *internal service quality* (equipping employees with the skills and power to serve customers). Employee satisfaction in turn fuels *employee loyalty*, which raises *employee productivity*. Higher productivity means greater *external service* value for customers – which enhances *customer satisfaction* and *loyalty*.

At Safariland we honor a high-performance culture of respect, teamwork, and empowerment to continuously improve the way we do business. Internal Customer Service is a driving force to our success with each other and in the marketplace and is one of our core values.

WHAT TO DO

Show Initiative – Look for opportunities to prevent problems, look for ways to keep customers happy.

Be Responsive – Respond to all voicemails and emails within 24 hours.

Be Flexible – Do something that makes the customer's life easier.

Be a Problem Solver.

Be Knowledgeable – Learn all you need to know.

Show Respect – Use common courtesy. If you know you are going to miss a deadline notify the person right away.

WHAT NOT TO DO

Avoid using all capital letters in emails.

Avoid negative speak.

Do not over commit and under deliver.



SAFETY IS HOW WE LIVE

Working with a focus on preventing incidents is paramount at Safariland. As a member of our team, you will be counted on to abide by our policies and procedures and are empowered to look for ways to solve unsafe conditions that could result in injury or loss of life. From the front offices to the manufacturing floor, our safety and security programs help us reduce risk to both our colleagues and our environment. This section covers topics pertaining to Safety, Health & Environment (SHE), security, and product safety.

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SAFETY, HEALTH & ENVIRONMENT (SHE)

At Safariland, our goal is for everyone to leave work in the same condition as they arrived and to promote environmental sustainability. We are committed to providing a safe and healthy workplace while protecting the environment in everything that we do. To achieve this goal, all of us must work to identify, minimize and manage risks to people and the environment in accordance with Company policies and procedures, as well as applicable laws and regulations. This applies to everything that we do, which means not just plant operations, but also extends to work activities such as office work, designing and selling our products, training, retail support, providing customer service, driving vehicles on company business and much more.

WHAT TO DO

Embrace the Safariland Red Zone / Green Zone Program.

Ensure compliance with applicable SHE regulations and standards, including federal, state and local safety and environmental regulations.

Notify your manager, supervisor or SHE Specialist immediately if you discover any unsafe or unlawful conditions including those not keeping to safety compliance standards.

Always assess and understand the risks of any work activity before doing a task. If you are not comfortable with the skills involved to complete the task or unfamiliar with the equipment, stop and ask for assistance.

Eliminate unreasonable safety, health and environmental risks from our facilities and services.

Always work in the Green Zone using the least hazardous chemical and minimizing impact to the environment by recycling and conserving energy.

Make emergency response drills and evacuations a routine practice as part of the Safariland Emergency Incident Management Plan.

Utilize safe practices and processes when handling hazardous chemicals or materials.

Consider safety, health and environmental impacts in the design and manufacturing of our products and services.

Always look for ways to “Reduce, Reuse and Recycle” by cutting down waste. Shut computers down each evening, turn lights off, printing in black/white instead of color if sufficient, use recycle bins for paper, aluminum and plastic available at each of our facilities and help us be part of a lighter footprint.

WHAT NOT TO DO

Do not perform a work activity without utilizing personal protective equipment (PPE).

Do not use chemicals that are not properly labeled or approved for use in our facilities.

Do not disable safety interlocks or operate machines without all of the guards in place.

Do not leave damaged electrical conduit or unsafe electrical wiring exposed.

Do not work on electrical or powered equipment without following lockout/tag-out procedures.

Do not block emergency exits or aisles leading to exits.

Do not text or use a handheld device while driving on Company business or travel. Texting while driving, as well as using handheld devices are not only against our policies but against the law in many states.

Do not store hazardous materials and chemicals in the path of storm water flow.

Do not participate or work in unsafe, latent conditions that may cause an incident resulting in an injury or property damage.

Do not operate or use any equipment without proper certification, training or applicable licenses (i.e. forklift operation).



SECURITY

Safariland is committed to taking necessary measures to provide a secure and safe work environment. In today's world of increasing threats, protecting the security of our people and workplaces is critical. Lapses in security, criminal acts, theft, damage, careless waste all have a direct impact on our success as individuals and as a Company.

WHAT TO DO

Be familiar with and be compliant with our Security policies and procedures.

Protect your badge and wear it at all times. Notify your manager or local SHE Specialist immediately if your badge is lost or stolen.

Exercise due diligence and conduct appropriate background checks for all permanent and temporary employees, contractors and vendors.

Ensure that all visitors are registered prior to entering our facilities.

Ensure that you follow the Foreign Visitor procedures, which includes always accompanying foreign visitors throughout their time in our facilities.

Notify your supervisor, manager or SHE Specialist immediately should you see unauthorized visitors on the premises.

Comply with our Company travel policies. This includes, but is not limited to, checking the U.S. Department of State website for travel advisories prior to travel abroad.

Notify your supervisor, manager or SHE Specialist if you discover an open door or unusual situation that would compromise our security.

WHAT NOT TO DO

Do not loan your badge out or let anyone else use it.

Do not travel overseas without filing a travel plan.

Do not allow guests into our facilities without proper identification or notice.

PRODUCT SAFETY / LIFECYCLE MANAGEMENT

Our Company's performance is dependent upon the successful management of projects covering product development, delivery of services and program management. Lifecycle Management (LCM) is the key process that defines the manner in which we manage these projects. LCM processes incorporate measures that assure the quality, safety and environmental sustainability, and compliance of products throughout their entire lifecycle from initial concept through retirement. It drives our capability to deliver projects that meet the business needs and ensure compliance with applicable safety, environmental and regulatory requirements. LCM promotes the application of Best Practices and Continuous Improvement across the Company in order to provide a sustainable competitive advantage. Our mutual objective is to achieve 100% conforming products, as embodied by our Zero Defects campaign.

WHAT TO DO

Ensure you understand and are in conformance with our Lifecycle Management and Product Safety and Environmental policies and procedures.

Notify your manager immediately if you discover any potential non-conformances to established LCM and Product Safety and Environmental policies and procedures.

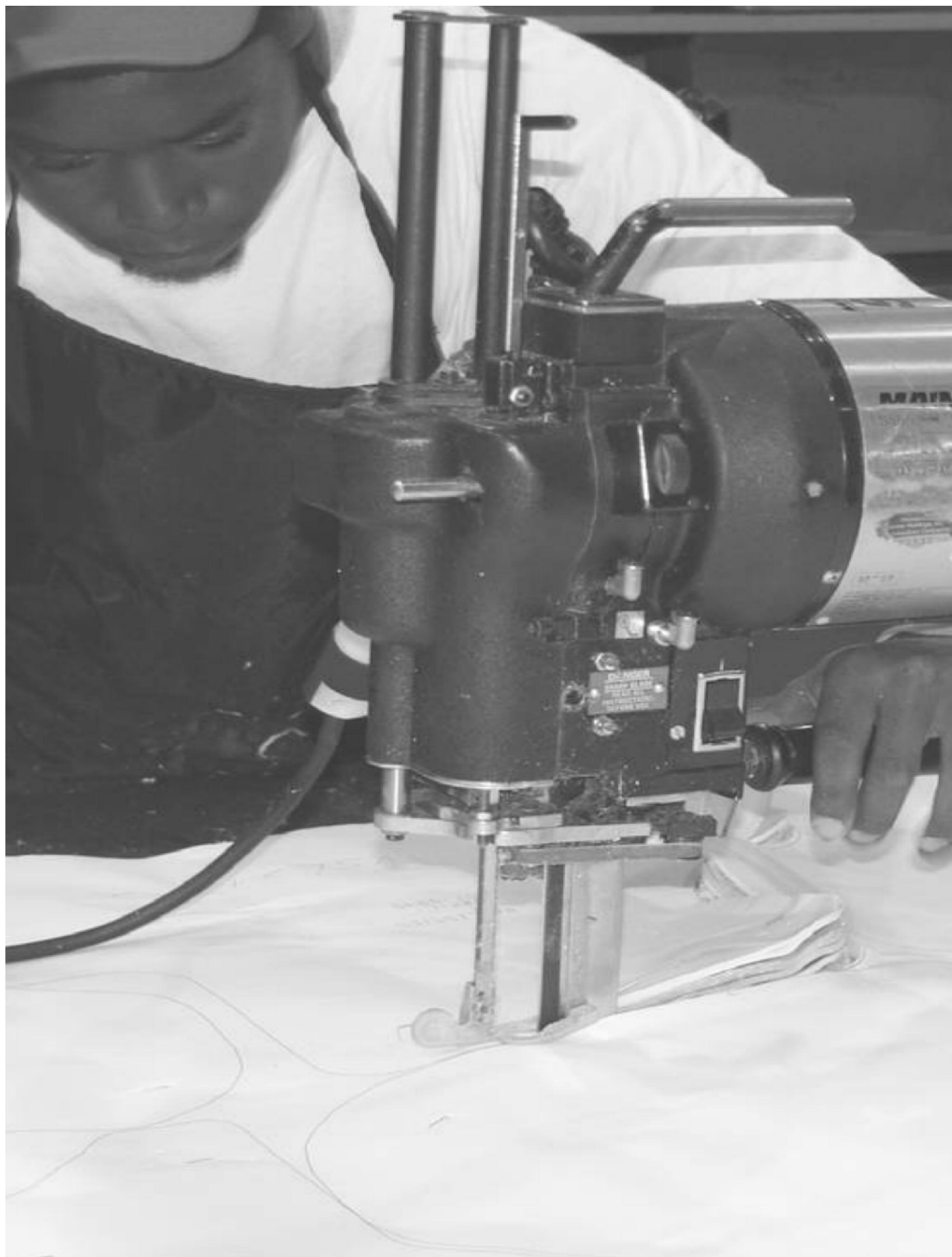
Embrace the Zero Defects campaign.

Assess and understand the safety risks associated with a product and work to mitigate this risk, both in the factory and in the field.

WHAT NOT TO DO

Do not assume that responsibility for Product Safety and adherence to the LCM process is someone else's job – we are all responsible.

Do not attempt to design a new product or revise an existing product if you are not qualified or delegated to do so.



Achieve the Right Results the Right Way

Our success as individuals and as a team is measured not only by what we do, but how we do it. This section of *The Safariland Way* outlines our focus on understanding business processes and policies and delivering on goals and objectives in a manner that is lawful, compliant and within both the structure and culture of our Company.

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COMPLIANCE WITH THE LAW

Although this Code of Conduct addresses many laws and regulations that impact Safariland business, it cannot address every situation that may arise. Laws and regulations are complex and subject to change, and often vary from country to country. We are all responsible for understanding Company policies and procedures and applicable laws relating to our particular job function. If in doubt, employees should seek help to ensure that they act in accordance with all applicable laws and regulations.

WHAT TO DO

Be knowledgeable about and comply with Safariland policies that affect your job responsibilities.

Be aware of the specific regulatory requirements of the jurisdiction, country or region where you work and that affect your business activity.

Gain a basic understanding of the key regulatory agencies and what they require that affects your business and work.

Assure that you coordinate with business or legal experts when working with or responding to requests of regulators.

WHAT NOT TO DO

Do not take action if you have doubts about the lawfulness and appropriateness of such action.

Do not ignore any red flags or potential issues that may lead to a regulatory compliance breach.

CONFLICTS OF INTEREST

As employees, we must ensure that our personal activities and interests do not conflict with our responsibilities to the Company. Sometimes even the mere perception of a conflict of interest can raise concerns. It is important to understand that even when nothing wrong is intended, the appearance of a conflict can have negative effects.

Conflicts of interest are situations in which competing interests may impair your ability to make objective and unbiased business decisions on behalf of the Company. Be sure to carefully consider what you do and decisions you make so as not to damage the reputation of the Company. Employees must promptly disclose any potential conflicts of interest to management.

WHAT TO DO

Disclose any situation in which you believe there is a potential or actual conflict of interest to your manager.

Use good judgment in all your business and personal dealings with others.

Obtain approval before accepting any officer or director position with an outside organization, including charitable, for-profit or governmental, while you are an employee of the company.

If you have any question of what constitutes a conflict of interest, seek guidance from your supervisors, a Human Resources representative or the Ethics Helpline.

WHAT NOT TO DO

Avoid even the perception of a conflict of interest.

Do not use your position or influence with the Company to promote or assist in an outside activity.

Hiring, promoting or directly supervising a family member or close friend.

OUTSIDE EMPLOYMENT

From time to time, you may wish to engage in work outside our Company. In doing so, you must ensure that any outside employment does not create a conflict of interest. We must never use Safariland tangible or intangible property, including documents, Information Technology assets, facilities and intellectual property to conduct non-Safariland business.

WHAT TO DO

Always notify your supervisor or manager if you hold an outside job.

Seek appropriate approval from management for any outside job.

Ensure that you can continue to meet the performance standards for your job.

WHAT NOT TO DO

Outside employment that constitutes a conflict of interest is prohibited.

Avoid accepting work for a vendor or a supplier.

Do not accept work from a competitor.

Do not own a part of another business that sells goods or services to Safariland.

Do not use Company tangible or intangible property (i.e. documents, Information Technology assets, facilities and intellectual property) to conduct non-company business.

FINANCIAL CONTROLS/ ACCOUNTING PRACTICES

Each of us, not just accountants and auditors, is responsible for doing our part to ensure controlled, accurate and timely accounting and financial reporting of information. Every action that we take, regardless of who we are, what we do or where we work, can result in an entry into Safariland's books and records. Every time we report hours worked, process an invoice, file, or approve an expense report, sign a contract, make a sale, have a business meal with a customer or another employee, receive raw materials or engage in any other business activity, we have an impact on our Company's financial statements.

WHAT TO DO

We must use our established financial and control systems to ensure honest, accurate and timely recording and reporting of information in order to make responsible business decisions and adhere to various laws and regulations.

WHAT NOT TO DO

We are prohibited from engaging in any activity that would circumvent our financial control systems.

We must never intentionally take actions or make entries to our books and records that are false, distorted, misleading, misdirected, deliberately incomplete, or suppressed.

We must never falsify any document.

BOOKS & RECORDS

All Company books, records, accounts and financial statements must accurately reflect our transactions, and conform to policy, procedure and legal requirements. These requirements help ensure that our business is managed effectively and our financial reports provide fair and complete information about our Company's financial performance. Honest, accurate and complete books and records significantly affect our Company's reputation.

WHAT TO DO

We have a duty to make sure that the information we submit in all Company records conforms to our policies and procedures, is complete and accurate, and complies with legal requirements

Keep and present all Company records and reports in accordance with the law.

Establish and maintain a system of strong and effective internal controls.

Ensure that all Company records accurately and fairly reflect the underlying transaction.

Record all financial transactions in the proper account, department and accounting period.

Ensure that all actions and commitments are in accordance with our Delegation of Authority.

Raise any concerns about the accuracy of Company records with finance management or through another appropriate channel, such as the Ethics helpline.

WHAT NOT TO DO

Never make a false representation in Company documents.

Never falsify any document.

We must never attempt to interfere with or improperly influence an audit, investigation or review.

EXPENSE REPORTING & REIMBURSEMENT

Employee travel and entertainment should be consistent with the needs of business and follow Company policies and procedures. Employees are expected to spend the Company's money as carefully as they would their own. The Company's intent is that an employee does not lose or gain financially as a result of company business travel and entertainment.

WHAT TO DO

We must ensure that our business expenditures are proper, reasonable and comply with our Company travel policy.

We should report and receive reimbursement for all approved business expenses.

We must submit all expense reports promptly.

Our reported expenses shall include receipts and explanations to properly support the expense.

WHAT NOT TO DO

Never falsify any document or receipt.

Do not report or attempt to receive reimbursement for non-reimbursable expenses.



SAFEGUARDING COMPANY PROPERTY

Company property includes physical property such as our facilities, vehicles, computers and networks, business equipment, merchandise, and supplies, as well as other assets such as information, data, records, and intellectual property. Proper protection and use of company property is a fundamental responsibility of every employee. We will commit to protecting our Company's property from theft, damage, loss or misuse.

USE OF COMPANY EQUIPMENT AND ASSETS

Safariland must also take care in using Company equipment, such as computers, phone systems, laptops, software, communication networks, cell phones and tools for each of us to perform our daily work. While limited personal use of certain resources is sometimes permissible, we should never take this privilege for granted or assume that we have a right to privacy when using these resources. We must also take care to use Company information technology (IT) appropriately and responsibly, and in accordance with relevant company security, communications and IT policies.

WHAT TO DO

Use IT equipment and phones for business operations. Use common sense and good judgment. You may use them for limited personal use providing it does not conflict or interfere with normal business activities, incur inappropriate costs or violate the law.

Use restraint in any information you post to the internet as it can instantaneously become global in nature, permanently available and open to being republished in other media.

We will exercise good judgment and integrity, and follow all security measures and internal controls when using company equipment and technologies.

We will safeguard important company data stored on our computer systems and networks.

We will report any misuse of company equipment to our supervisor.

We will store company property and assets in secure locations to prevent unauthorized use or theft.

WHAT NOT TO DO

We will not violate company security policies when using company equipment.

Do not install unauthorized software on a company computer or copy software except where there is appropriate licensed software.

We will not allow unauthorized use of any company equipment, nor use company equipment to conduct outside work.

We will not install company software on personal / home computers, nor install personal software on company computers without proper authorization.

We will not share company equipment with others outside of Safariland without proper authorization.

We will not use company equipment to access or download inappropriate, sexually explicit, or illegal information.

Never use company systems (such as e-mail, instant messaging, the Intranet or Internet) to engage in activities that are unlawful, violate company policies or result in liability to Safariland.

INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

Our intellectual property and confidential information are among Safariland's most valuable assets, and we must protect them against theft, misuse, and loss. Intellectual property includes any of our Company's patents, trademarks, copyrights or other intangible assets, such as ideas, inventions, processes, or designs created on Company time, at Company expense, using Company resources or within the scope of our job duties. Confidential information also includes business plans, engineering and manufacturing ideas, financial information, new product launch plans, databases, customer lists, pricing information and other Company records and ideas. We also have an obligation to protect our intellectual property and confidential information from unauthorized use by others. At the same time we must respect the rights of others, as unauthorized use of others' intellectual property can expose the Company and even individual employees to civil law suits and damages.



WHAT TO DO

We will use care when working with company property to ensure that these assets do not lose value due to misuse or abuse.

We will respect patent, trademark, copyright, fair use, trade secret laws and Company guidelines in all our communications.

We must take timely and reasonable steps to secure intellectual property protection for inventions, proprietary information, trademarks, trade secrets and copyrighted materials.

We will work diligently to safeguard our intellectual property and understand that we are obligated to properly use and mark our products and collateral with accurate patent, trademark and copyright markings.

We must always respect the valid intellectual property rights of others by avoiding unlawful use. To this end, we should also take great care to use proper trademark and patent markings owned by our suppliers.

We shall be mindful and follow proper Company guidelines in using non-disclosure agreements for protection of our property.

WHAT NOT TO DO

We must never use or disclose the Company's intellectual property or confidential information to persons inside or outside the Company unless authorized to do so.

We must not knowingly violate others' intellectual property rights.

We must not use or accept proprietary information belonging to others without obtaining initial approval from our Legal & Compliance Department.

We must not disclose any new or novel idea or invention to others without first safeguarding the information upon consultation with the Legal & Compliance department.

We will not disclose or use the confidential information of former employers.



PRIVACY

Safariland is committed to handling personal data responsibly and in compliance with applicable privacy laws. An increasing number of U.S. states and countries around the world are more stringently regulating the collection and use of “personal data” (names, home and office contact information, financial information, and other data). In addition, many countries regulate personal data of company representatives in business-to-business transactions. A few countries even regulate the privacy of information relating to corporations.

WHAT TO DO

Understand and comply with the privacy policies of Safariland, applicable legal requirements in the territories in which Safariland operates, and relevant contractual requirements.

Collect, process and use personal data (whether relating to Safariland, or its customers, vendors, or business partners) for legitimate business purposes only, and with due care.

Restrict access to personal data to individuals who need it for a legitimate business purpose.

Report any known uses of personal data that are in violation of our policies.

Immediately notify IT or Legal & Compliance department if you learn of any compromise of the security of any system or device containing personal data.

WHAT NOT TO DO

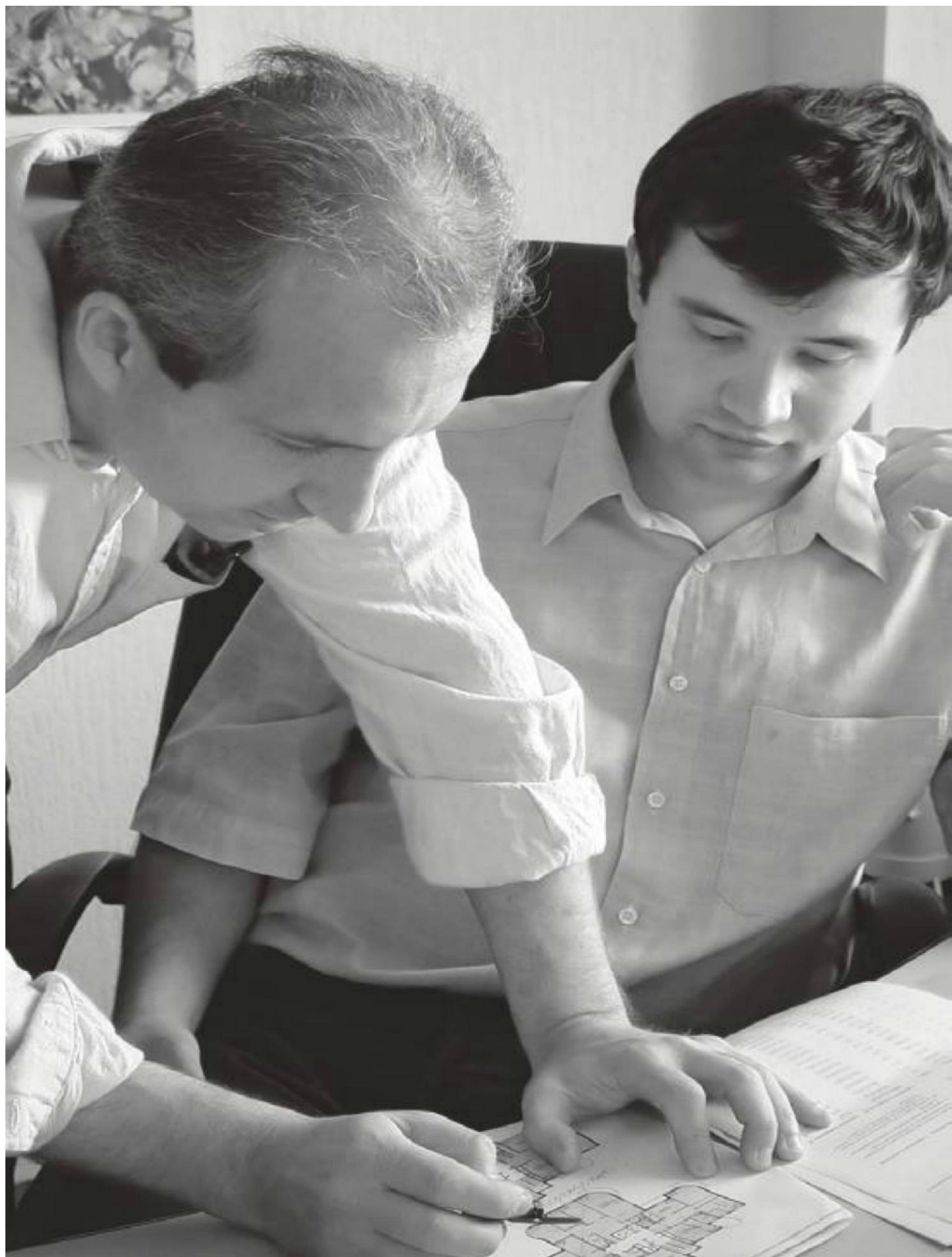
Do not share personal data with third parties, such as customers, vendors, or business partners that lack adequate security safeguards or restrictions on information use.

Do not email or distribute personal data without requisite permissions, and without adequate security and access controls.

Do not email or distribute personal data to individuals without a need to know.

Do not leave printouts with personal data at a printer, copy machine or fax machine for others to see.

Do not transfer personal data between countries without considering applicable legal and regulatory requirements.



Make Fact–Based Decisions

Effective communication and internal / external research are keys in operational planning. Without the right information, the best laid plans go south. Proactive engagement in understanding processes helps us manage both risks and rewards. The following section guides you on approaching and establishing common goals to resolving challenges and creating solutions using the right methods.

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Make Fact-Based Decisions

MAKING SOUND DECISIONS

We make decisions every day while at work. Making sound decisions is integral to our Company's performance. Employees must ensure that their decisions are fact-based, meaning that they comply with this Code of Conduct and Company policies, applicable laws and regulations, and supports Safariland's Mission, Vision and Values. Although many decisions are a routine part of our jobs, sometimes we encounter situations that require careful consideration of options before proceeding.

WHAT TO DO

To help guide sound decisions that are fact-based, employees should follow the following steps:

- Evaluate the Situation
- Check the Rules
- Consider the Consequences
- Consult with Others
- Use Good Judgment

Always obtain guidance from your manager or supervisor if you have any questions about a decision.

WHAT NOT TO DO

Do not make decisions that compromise the integrity of the Company.

Do not make decisions that would violate any Company policy or applicable laws and regulations.



GOVERNMENT RELATIONS / LOBBYING

As a leading global provider of personal protective equipment for law enforcement officers and members of the Armed Forces, Safariland conducts business both directly and indirectly with federal, state and local governments and officials. Dealing with governmental agencies and officials presents unique challenges because each country, state or other governmental subdivision typically has their own rules for business interactions. Lobbying activities are heavily regulated and failure to comply with the laws can lead to significant penalties. Further, the definition of “lobbyist” can vary widely and may include almost any interaction with government officials for a business purpose.

When it comes to lobbying or political support, the Company limits those efforts to policy issues and debates that are of legitimate concern to our business objectives. The Company will not make political payments, nor will it participate directly or indirectly in political activities or make corporate contributions or donations to political parties or their representatives. Lobbying efforts must be conducted openly and honestly, and in compliance with applicable laws.

These limitations on the Company’s political activities are not intended to restrict employees’ rights to participate as individuals in the political process. As citizens, employees can make personal contributions to a political party, committee or candidate as long as the donation does not directly or indirectly involve Company funds or other resources. No one should exert any direct or indirect pressure in any form on employees to contribute money or effort in support of a political party or candidate.

WHAT TO DO

Ensure that you know in advance of working with any governmental agency or official, what specific laws and regulations are applicable to both the agency/official and the type of transaction you intend to pursue.

If you intend to engage in lobbying, first make sure to consult with management before any contact is made with government officials. If approval for lobbying is authorized, comply with all requirements of law, regulation and internal policy, including, but not limited to, complying with the laws and regulations relating to registration and reporting.

WHAT NOT TO DO

Do not offer government officials gifts or meals, regardless of the amount, without getting advanced approval from management, and knowing what the law, rules and regulations that government agency has with respect to accepting gifts or hospitality.

Do not use Company time, property or funds to carry out or support your personal political activities.

Make Fact-Based Decisions

When engaging in personal political activities, make sure that those involved know that the views and actions you are taking are your own and not the Company's.

Never contribute company funds or other company assets for political purposes in the United States or outside the United States without the prior approval of the Legal & Compliance department.

COMMUNICATING WITH THE PUBLIC

We strive to always communicate with the public and the media in an accurate and consistent way. To be sure that we comply with the law and speak with one voice all inquiries should be addressed to a designated individual authorized to speak on behalf of the company.

WHAT TO DO

Refer all contacts from mainstream media, journalists or other outside parties to the communications manager.

For any contact that comes in from the government or law enforcement official regarding a sensitive matter, you should refer the call to our in house legal counsel, or to the communications manager for proper routing.

If you receive a media call and you aren't sure to whom it should be directed, route to our communications manager for handling.

Ensure that all media releases and other external communications are routed through the communications manager for review, authorized executive and Compliance approvals, and distribution.

We will respect trademark, copyright, fair use, trade secret and financial disclosure laws and Company guidelines in all our communications.

As a subject matter expert for your product, share publicly disclosed product information that informs and supports the promotion and sale of your product but does not release any confidential or sensitive information.

We will be honest, open and truthful in our dealings with the public and media.

WHAT NOT TO DO

If approached by a member of the media or outside parties for information do not provide confidential Company information.

Do not issue any statement about the Company without initial approval to speak with the media.

Do not provide any sensitive or technical information about our product to media or other outside parties that has not been cleared by Compliance.

Do not say anything in a public forum that you would not feel comfortable with if it made the headlines.

SOCIAL MEDIA

Social networking sites and other electronic communications are part of the business mainstream today. In general, the rules that apply to new communication tools are consistent with traditional communication rules. We will carefully consider how we refer to work/business activities through the use of Company or personal computing devices and social media.

WHAT TO DO

The use of social media should be managed with caution and care.

We will be truthful, accurate and respectful.

We will be transparent in our personal postings and reveal our relationship with Safariland.

We will be mindful of the company's reputation, other people's right to privacy, the trust of our customers, suppliers and other business stakeholders and potential conflicts of interest.

Be sure to use restraint and consider the risk to our customers, Safariland and our colleagues before we post any social media.

We should be aware that expressing personal views in a public forum can have an adverse impact on our personal and professional reputation and the reputation of our customers and suppliers.

WHAT NOT TO DO

Do not make unauthorized disclosures, including proprietary or confidential information, trade secrets, corporate transactions or discuss legal matters.

Employees are prohibited from using social media to provide employee or other reference requests.

When stating your personal opinion, do not create the impression, intentionally or unintentionally, that you represent Safariland or are expressing the views of Safariland.

Do not post personal information about other employees, customers or vendors.

Do not post photos, videos or other media without the consent of all those exhibited and/or the communications manager.

Do not use discriminatory, harassing, intimidating or offensive language.

Remember that you should never discuss or post topics that involve the Company's confidential information.



ACCOUNTABILITY AND WAIVER OF THIS CODE

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ACCOUNTABILITY AND WAIVER OF THIS CODE

ACCOUNTABILITY AND WAIVER OF THIS CODE

This Code of Conduct has been approved by the Safariland President and senior management and applies to them and all Safariland employees, including temporary and contract employees.

Any waiver of this Code of Conduct requires prior written approval of the Safariland President and Legal & Compliance department, and will be promptly disclosed. Should any of part of this Code of Conduct conflict with any applicable laws or regulations, such law or regulation will apply.

Any violation of this Code of Conduct may result in disciplinary action up to and including termination.

This Code of Conduct should be viewed as Company policy. As with any Company policy, compliance with the Code is considered a condition of employment at Safariland. This Code is not a contract, nor does it alter the at-will employment status of employees in the U.S.

ETHICS HELPLINE

To contact the Safariland Ethics Helpline use the following number(s):

United States	866-830-5772
Mexico	001-855-312-8681

Or:
<https://safariland.alertline.com>

For reference or more information on the topics and guidelines in this book, our policies are posted on the Intranet:

<http://home.safariland.com>



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Jacksonville, Florida 32218
904-741-5400

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