



Axalta Supplier Code of Conduct

Effective June 2014



Axalta is committed to doing business ethically and responsibly and expects the same of its suppliers. In support of this commitment, Axalta has developed a Supplier Code of Conduct to convey its expectations of its suppliers with regards to compliance with laws, business practices and treatment of people. Axalta suppliers should review the list of expectations below, as well as the Axalta Code of Business Conduct and Ethics, and take appropriate steps to ensure compliance. Axalta may seek to verify its suppliers' compliance with this Code, including through audits. Violations may be grounds for termination of the business relationship with the Supplier.

1. Act in compliance with laws. Suppliers shall maintain awareness of and comply with all applicable laws and regulations of the countries where they operate, including – where applicable – anticorruption laws, customs regulations, export and trade control laws, and fair dealing and competition laws.
2. Do business ethically. Suppliers shall not pay bribes or provide kickbacks or give anything of value to secure business or any business advantage.
3. Avoid inappropriate gifts, meals and entertainment. Suppliers shall not provide or offer gifts, meals or entertainment (including cash or cash equivalents) that could or could appear to inappropriately influence a business decision. Business courtesies of nominal value may be offered only in a manner consistent with the Axalta Code of Business Conduct and Ethics.
4. Demonstrate respect for people. Suppliers shall seek to employ a diverse workforce, provide a work place free of discrimination and harassment, and treat employees fairly, including with respect to wages, working hours, benefits and working conditions.
5. Respect fundamental human rights. Suppliers shall ensure that the products and materials they sell to Axalta are not created with child labor, forced labor or through the victims of human trafficking and shall take reasonable steps to eliminate such practices in their supply chains.
6. Provide a safe working environment. Suppliers shall provide a safe, clean and healthy working environment that complies with all relevant laws, rules, and regulations and shall strive to prevent occupational injuries and safety incidents.
7. Comply with environmental regulations. Suppliers shall conduct their businesses in a manner compliant with applicable environmental laws, regulations and industry standards and shall support Axalta's efforts to operate sustainably.
8. Cooperate on Conflict Minerals. Suppliers shall enable Axalta's compliance with the Conflict Minerals reporting rules imposed by the U.S. Securities and Exchange Commission.
9. Keep accurate books and records. Suppliers shall maintain accurate books and business records as required by applicable legal and regulatory requirements and accepted accounting practices.
10. Manage and protect information. Suppliers shall take appropriate steps to protect Axalta's proprietary or confidential information, including employee information, customer data, intellectual property and trade secrets.

Where permitted by law, suppliers may report suspected violations of this Supplier Code of Conduct to Axalta's Ethics Hotline via www.lighthouse-services.com/axaltacs.com or to:

Axalta Coating Systems - Attention: Chief Compliance Officer, Suite 3600, 2001 Market Street, Philadelphia, PA 19103