

Excellence through Integrity



Excellence through Integrity



A Message from Chris Trainor

Batesville is committed to our Core Values, and the highest ethical standards in all that we do in furtherance of our mission of helping families honor the lives of those they love®. Our Code of Ethical Business Conduct (“the Code”) is a guide that helps us apply our Core Values to day-to-day situations in order to make good business decisions that comply with applicable laws.

The Code sets a clear expectation that our business conduct standards must be followed by our associates, contractors, consultants and other business partners for all Batesville related activities, regardless of any pressures in the business. We also expect our leaders to uphold their responsibility to lead by example and help others to understand and follow the important principles in our Code.

Batesville has a remarkable culture where associates respect one another and live our Core Values daily. Please have the courage to speak up if you observe any conduct that is a potential violation of our Code or other policies and procedures. We offer a range of resources in the Code to address questions and concerns, and we have made it easier to speak up by providing a mobile QR code to raise concerns using your phone, or by going online to our ethics website, and by calling our ethics hotlines, which are available in all countries where we operate. Retaliation against those who raise concerns in good faith will not be tolerated, but concerns can also be raised anonymously.

Your continued dedication to Batesville’s Mission and the Core Values that unite us are what maintain our culture of compliance here at Batesville. Thank you for this commitment.



Chris Trainor
Chief Executive Officer

Table of Contents



4 Core Values & Behaviors

5 We Live Our Values

Our Code: Excellence through Integrity
How We Operate
Ask Questions and Report Concerns

11 We Respect One Another

Respect in the Workplace
Health and Safety
Human Rights
Environmental Protection and Sustainability
Protection of Personal Private Information

18 We Are Accountable

Anti-bribery, Anti-corruption
International Trade
Doing Business with the Government
Fair Competition

24 We Protect Our Reputation

Accurate Recordkeeping and Financial Reporting
Confidential Business Information
Speaking on Behalf of the Company
Political Activity and Contributions
Service to Our Communities

30 We Make Good Decisions

Conflicts of Interest
Gifts and Entertainment
Use of Company Assets

Core Values & Behaviors

Our Core Values are foundational aspects that guide the performance of our work and our conduct. They are:

Courage

- We stand for what is right and expect people to speak up when something is wrong.
- We communicate with professional candor, use clear language and take responsibility for being understood.
- We make tough decisions for the long-term good of the company.
- We encourage responsible risk-taking.
- We set clear expectations and hold each other accountable for our actions.

Individual Worth & Integrity

- We are a responsible corporate citizen committed to the health and safety of people, involvement in our local communities, protection of the environment and compliance with laws, regulations and Company policies.
- We treat one another with professionalism and respect.
- We honor our commitments, building trust in relationships.
- We value diversity of thought and experience.

- We believe in teamwork to leverage our individual strengths.
- We lead by example from all levels and are accountable for our actions, successes and failures.
- We protect the Company's resources as if they were our own.

Excellence in Execution

- We strive for simplicity, alignment and speed in our work.
- We strive for excellence in all that we do.
- We ensure each person's job is aligned to provide value for the customer and prosperity for the Company.
- We believe the pursuit of perfection (Plan-Do-Check-Act) will drive the results that differentiate us from our peers.
- We shed low value-added tasks that reduce our focus.
- We truthfully assess our business environment and share both opportunities and challenges with clarity.

Customer Focus & Partnership

- We put both external and internal customers first and are committed to creating a customer-centric culture.
- We promote a culture of innovation and partnership to meet our customers' needs.

- We rely on customer feedback to guide our product development and share new solutions.
- We value our relationships with customers and treat them with fairness and integrity.
- We believe in empowering associates to own and resolve matters to create a more positive customer experience.

Spirit of Continuous Learning & Improvement

- We value each person taking initiative to solve problems and improve his or her job.
- We believe that our leaders should serve as teachers and coaches in developing our associates: go see, ask why, and show respect.
- We value learning as the way to achieve the full potential of each individual; we promote the sharing of learning to achieve the full potential of the Company.
- We believe a culture of continuous improvement is built on a Plan-Do-Check-Act approach to leadership.
- We foster a global culture and mindset where ideas are valued on their merit, not by their source.

We Live Our Values



Courage

Topics in This Section

- Our Code: Excellence through Integrity
- How We Operate
- Ask Questions and Report Concerns



Code of Ethical Business Conduct



Our Code: Excellence through Integrity

Welcome to our Code of Ethical Business Conduct (“Code”). Our Code and our Core Values convey our strengths and create a solid foundation for ethical business behavior. Our Code also serves as a practical guide to understand our ethics and compliance standards. It will help you apply our policies and Core Values to situations you may face while representing Batesville Services, LLC or one of its affiliates (together, “the Company” or “Batesville”).

If you need additional information or guidance, talk to your supervisor or contact any of the other resources listed in the Ask Questions and Report Concerns section of the Code. More detailed policies on specific topics are also available on our intranet site, B-Life, in your employee handbook or from your Human Resources (“HR”) representative.

Our associates are expected to comply with the formal requirements of the Code, applicable laws and regulations and Company policies, as well as with the spirit of these rules. If there is a conflict between the requirements of the Code and the laws, customs or practices in a particular location, talk with your supervisor or the **Legal Department** before you act.

Who Must Follow Our Code

Our Code applies everywhere we do business. Everyone who works for or on behalf of the Company must follow our Code, as well as related laws and policies. This includes all associates, but also consultants, agents, sales representatives and independent contractors.

Accountability and Discipline

Our Code will be vigorously enforced in the best interests of the Company. When a violation of this Code, our policies or the law occurs, appropriate disciplinary action will be taken, up to and including termination of employment. Certain actions may also result in legal proceedings, penalties or criminal prosecution.





How We Operate

The choices we make each day reaffirm our commitment to our Core Values and help shape our corporate culture.

Understand Your Responsibilities

- Always act in a professional and ethical manner. Be aware that your behavior reflects on your reputation and the Company's.
- Be familiar with the Code and related policies and how they apply to your job responsibilities.
- Report suspected violations of the Code, Company policy or illegal behavior using the **Ask Questions and Report Concerns** section of this Code.
- Remember, pressures of the job are never an excuse for violating the law, our Code or any Company policy.

Making Good Decisions

Making good decisions is not always easy. At times you will be under pressure or may be unsure of what to do. When faced with a difficult decision, ask yourself:

Is what I'm doing consistent with our Core Values, this Code, the law and Company policies?



Have I considered the consequences and risks involved with my decision?



Have I considered other options?



Would I want my actions reported in the news?



Would I be comfortable describing my decision to my family and friends or at an all-associate meeting?

If the answer to any of these questions is "No," or if you're not sure, stop and ask for help.



How We Operate (cont.)

Additional Responsibilities of Company Leaders

The Leader's Mindset is a component of our Company's Operating Model and identifies four basic principles used to consistently run the business: Results Matter; No Surprises; Be on Pace; Data Driven. Those principles must always be executed in a manner consistent with our Core Values. Our leaders have additional responsibilities to meet our high standards of ethics and compliance:

- Lead by example and be a role model for ethical behavior.
- Be a resource for others. Communicate to associates and business partners how the Code and policies apply to their daily work.
- Create an environment in which associates understand their responsibilities and feel comfortable raising concerns without fear of retaliation.
- Do your part to ensure no one who has the courage to speak up suffers retaliation.
- Consider alignment with a strong ethics and compliance culture when evaluating and rewarding associates.
- Remind others that business results are never more important than ethical conduct and compliance with our policies and the Code.



What if I see misconduct, but it's not in my department? If I observe misconduct, am I required to report the issue even if I'm not directly involved or it involves another department? I'd rather not get involved.

Yes.

Associates are required to report potential violations of the Code, the law or Company policies. One approach may be to talk first with the supervisor overseeing the problem area (unless you believe he or she may be approving or participating in the misconduct). Also, you can use any of the other resources listed in our Code – see the **Ask Questions and Report Concerns** section below. Remember: if there is misconduct in our Company, it is everyone's problem.



Ask Questions and Report Concerns

Everyone must do their part to maintain our high standards for ethics and integrity. Associates are expected to act with courage when they see wrongdoing.

In all cases, if you see a potential violation of the Code, the law or a Company policy – REPORT IT. If you don’t understand the Code, a law or policy – ASK ABOUT IT.

You do not need to be certain that a reportable violation has occurred, and you shouldn’t wait until you think you have “all the facts.” If you see or suspect a potential violation, you must either:

- Discuss the issue with your supervisor (or escalate if the response you receive is unsatisfactory);
- Talk directly to your Human Resources representative or the **Legal Department**; or
- Contact the Company through one of the following sources, which you may do anonymously:

Reporting Hotline:

U.S. (including Puerto Rico):
1-844-719-6100
Mexico: 1-844-719-6101
Canada: 1-800-880-0773

EthicsPoint:

[Batesville.ethicspoint.com](https://www.batesville.ethicspoint.com)

Mobile:



How to Raise Concerns through the Hotline, Web Portal, or Mobile Device

Our Reporting Hotline, staffed by third-party ethics and compliance specialists, is a confidential way to report possible violations of the Code, the law or Company policies. You may contact the Reporting Hotline 24 hours a day, 7 days a week. Please tell the compliance specialist you work for a Batesville Services to appropriately log your concern.

When you contact the Hotline, the operator will listen, ask questions and write a summary report for the **Legal Department** to assess and direct any further action.

You can also report possible violations online confidentially at **Batesville.ethicspoint.com**. You will be prompted to “Enter Organization Name”. Type in “Batesville” and choose the appropriate part of the Company of concern.

Both EthicsPoint and the Reporting Hotline may be accessed anonymously, where permitted under local law. When using these resources, provide as many details as you can about the potential violation (e.g., specifics about who, what, when, where, and how). If you choose to report anonymously, we encourage you to arrange to follow up with the Reporting Hotline or on EthicsPoint in case additional information is required to complete an investigation.



Ask Questions and Report Concerns (Cont.)

Confidentiality

Any information reported through the Hotline, EthicsPoint or any other channel will be treated confidentially. If an investigation is needed, information may be shared on a need-to-know basis. The Company may also be required by law to report certain types of activities.

Zero Tolerance for Retaliation

The Company will not tolerate retaliation against anyone who reports a problem in good faith, nor will we tolerate retaliation against anyone who participates in an investigation. If you believe you have been retaliated against or have witnessed retaliation, report it to the **Legal Department** immediately.

Good Faith Reporting

Reporting “in good faith” means you had reason to believe a violation of the Code, the law or Company policy occurred and are sincere in your attempt to provide honest and accurate information, even if an investigation determines there was no violation.



Am I being retaliated against?

*Three months ago I contacted the **Legal Department** anonymously. I was concerned that my team leader might have awarded a contract improperly to a company owned by his friend. It was investigated and action was taken. My team members have recently stopped speaking to me and copying me on important communications, and I am worried this will affect my performance. I believe my colleagues know I reported our team leader and are retaliating. What should I do?*

Contact the **Legal Department immediately.**

A thorough investigation will take place to see if there has been retaliation against you. If so, appropriate action will be taken.

We Respect One Another



Individual Worth & Integrity

Topics in This Section

- Respect in the Workplace
- Health & Safety
- Human Rights
- Environmental Protection & Sustainability
- Protection of Personal Information



Code of Ethical Business Conduct



Respect in the Workplace

We value diversity, equity, and inclusion and are committed to treating all associates, customers, business partners, suppliers, and the public with professionalism and respect. We are a better company and can provide the best customer experience because of the diversity of our associates. As a global company, our work environment should be welcoming to allow associates to best use their unique talents and diverse perspectives to further innovation.

We do not tolerate violence, harassment (including sexual harassment), offensive or threatening behavior, or acts that are otherwise inappropriate in a workplace.

We are an equal employment opportunity employer and base hiring decisions on job qualifications and merit. We are committed to fair and nondiscriminatory employment decisions. We prohibit discrimination and harassment based on race, ethnicity, color, religion, sex, national origin, age, sexual orientation, genetic information, disability, or any other characteristics protected by law. We also comply with all applicable labor, employment and immigration laws.

- Do your part to help create a culture of respect.
- Be courteous, considerate and fair to others.
- Keep an open mind to new ideas and opinions.
- Do not engage in conduct others find offensive, derogatory or threatening.
- Do not make inappropriate comments or jokes.
- Never retaliate against an associate who has raised a concern about a violation of this Code, the law or a Company policy.
- Base employment decisions on job qualifications and merit.



Can I make a judgment call about who to interview given what I know about the candidate's family situation? I believe a position on my team would not be suitable for a single parent, as it involves a lot of travel. This is not about prejudice, but practicality. Am I obligated to interview single-parent candidates out of courtesy?

You are obligated to interview the most qualified candidates who meet the requirements of the job. This cannot be determined simply on the basis of personal opinion. Making assumptions like this violates our values and in some cases is against the law.



Respect in the Workplace (cont.)

Sexual Harassment

Sexual harassment may occur when:

- Unwelcome actions of a sexual nature are made as a condition of employment or used as the basis for employment decisions; or
- An intimidating, offensive or hostile work environment is created by unwelcome sexual advances, insulting jokes or other offensive verbal or physical behavior of a sexual nature.

Any of the following can be instances of harassment and are not tolerated by the Company:

- Demands for sexual favors in exchange for a benefit or to avoid an adverse action, even if implied;
- Inappropriate remarks, gestures or physical contact;
- The display of inappropriate pictures or other inappropriate material; and
- Sexual or other offensive jokes, comments or emails.

If any associate witnesses any of the above behaviors or others that violate this Code or our policies, we encourage them to report their concerns and we will protect them from any retaliation for doing so. Any associate who engages in harassing behavior will be subject to severe disciplinary action, up to and including dismissal.



Learn more

Additional policy information is available from your Human Resources Representative and on [B-Life](#).



***Do the same rules about harassment apply away from the office or 'after hours'?** While on a business trip, a colleague repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked him to stop, but he wouldn't. We weren't in the office, and it was 'after hours' so I wasn't sure what to do. Should I report this?*

Yes.

This type of conduct is not tolerated in any situation, including business trips or after hours. If you are uncomfortable raising the issue with your supervisor, talk to Human Resources or use a resource found in the [Ask Questions and Report Concerns](#) section of the Code.



Health and Safety

We conduct our business in a safe manner that minimizes potential harm to people. We look out for one another to help ensure our co-workers, contractors and visitors are safe.

- Maintain a safe working environment and be proactive to minimize and prevent workplace injuries.
- Know the emergency and security procedures that apply where you work.
- Never bypass or “work around” safety.
- Comply with all applicable laws and Company policies related to protecting health and safety in the workplace.
- Be sure your performance is not impaired by alcohol or any drugs, including prescription and over-the-counter medications.
- Never email, check the internet or text while driving on Company business.
- Help contractors and others we work with understand and follow our safety and environmental procedures.
- Alert your supervisor, other Company management or Human Resources about any unsafe conditions.
- If you are injured on the job, report it to a supervisor immediately, no matter how minor. Never assume someone else made the report.

Workplace Violence

Violence of any kind has no place at the Company. We will not tolerate:

- Causing intentional physical harm to others;
- Physical or verbal threats or intimidation;
- Acts of vandalism, arson or other criminal activities; or
- Possession of weapons on Company property unless specifically authorized by the Company where permitted by law.



If I believe a co-worker is impaired, what should I do? A co-worker seems to be under the influence of drugs. I'm worried she might hurt herself or others. What should I do?

Anyone on the job who is impaired by alcohol or any drugs – legal or illegal – is a safety risk. Steps must be taken immediately to address the problem. Speak with your supervisor first. If your concerns are not resolved, use a resource found in the **Ask Questions and Report Concerns** section of the Code.



Human Rights

We strongly believe in human rights and the worth and integrity of every individual. We support international efforts to promote and protect human rights. We will not tolerate abuse of human rights in our operations or in our supply chain.

Each of us can help support efforts to eliminate human rights abuses:

- Report any suspicion or evidence of human rights abuses in Company operations or in operations of our business partners to the **Legal Department**.
- Remember that respect for human dignity begins with our daily interactions with one another, including our customers and business partners. It also includes promoting diversity and inclusion, accommodating disabilities and doing our part to protect the rights and dignity of everyone.



Learn more

Supply Chain Transparency Policy



What if a supplier is employing child labor?

When I was visiting a new supplier, I noticed several associates who seemed underage. When I asked about it, I didn't get a clear answer. What are my next steps?

Report the incident to the Legal Department We are committed to human rights and to the elimination of human rights abuses.



Environmental Protection & Sustainability

We comply with all applicable environmental laws and regulations. Associates who work directly with regulated materials have specific responsibilities to ensure they are used, stored, transported, and disposed of in a legal, safe and responsible way. We are also committed to sustainability in our operations.

We work to continuously improve our environmental impact through resource conservation, waste minimization, water and energy efficiency, and effective use of raw materials.

- Comply with all laws, policies, permits, and regulations aimed at:
 - Protecting the environment;
 - Conserving energy, water and natural resources; and
 - Reducing the environmental impact of our operations.
- Report any incidents or conditions that might result in an environmental regulatory violation or adverse environmental impact.
- Be proactive and look for ways we can reduce waste and use energy and natural resources more efficiently.





Protection of Personal Information

We respect the privacy of associates, customers and business partners. Data privacy laws dictate how we collect, store, use, share, transfer, and dispose of personal information. Always handle private information with care. Follow our policies and protect any personal information entrusted to you.

- Keep personal information safe and secure. For example, password-protect documents with personal information such as bank accounts, social security numbers, and health information.
- Collect, access and use personal information only for legitimate business purposes and in accordance with our policies and applicable laws.
- Provide personal and confidential data to authorized individuals only.
- Make sure third-party service providers understand the importance we place on privacy and have agreed to keep the information confidential. Review the Confidential Information section for more information.

Examples of personal information includes the following:

- Email or physical address
- Phone number
- Credit card, banking or financial information
- Social security number or other government-issued identification information
- Employee medical information
- In certain states and provinces, as well as much of the world, personal information virtually all data and information that identifies an individual, including even their name.

If you learn that personal data has been used in violation of the law or our policies, or if the security of any system or device containing personal data has been compromised, notify your supervisor or use a resource found in the **Ask Questions and Report Concerns** section of the Code.



We Are Accountable



Excellence in Execution

Topics in This Section

- Anti-bribery, Anti-corruption
- International Trade
- Doing Business with the Government
- Fair Competition





Anti-bribery, Anti-corruption

Bribery and corruption in all forms are completely contrary to our Core Values and business standards. We are committed to complying with the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Anti-bribery Act and all other similar laws and regulations that prohibit bribery and corrupt practices.

In some cases the laws of one country, like the FCPA, regulate Company activities around the world. Our firm commitment to complying with these rules is expressed in our Global Anti-Corruption Policy, which applies to all Company employees, officers and agents.

- Do not offer, promise, give or accept payments or gifts you believe to be a bribe, kickback or other kind of improper payment.
- Never offer facilitation or 'grease' payments.
- Keep accurate books and records so that payments can be honestly described and documented.
- Report any potential anti-corruption law or policy violation immediately to the **Legal Department**.
- Failing to report a bribe or other illegal activity is a violation of our Code.

We're not only responsible for our actions, but potentially also for the actions of any third party who may represent or conduct business with the Company (i.e. agents, consultants, distributors, joint venture partners). Be diligent in how you identify and monitor those parties.

- Never pay a fee to a consultant, agent or other intermediary if you have reason to believe some portion of the payment will be used as a bribe or an attempt to obtain an improper advantage for the Company.
- Be aware of our anti-corruption and bribery standards when selecting third-party intermediaries (i.e., sales agents, customs brokers, freight forwarders, and any other intermediary that may interact with a government official on our behalf) for the Company.
- Follow our due-diligence procedures for third parties and require them to comply with our Global Anti-Corruption Policy and this Code.
- Be vigilant and monitor intermediaries' behavior. Know the red flags that may signal a potential violation. Never 'look the other way.'

Vocabulary

A bribe is anything of value offered, promised or given to influence the behavior of someone in government or the private sector in order to obtain an improper business or other advantage.

A bribe can be something other than cash. A gift, favor (including travel and entertainment expenses) or offer of a loan or a job to a family member could be a bribe. Before offering anything of value, review our policies and ask questions about what's acceptable (and what's not).

Facilitation payments are typically small payments to a low-level government official intended to encourage the official to perform his or her responsibilities. These are also not permitted.



Anti-bribery, Anti-corruption (contd.)

The Impact of Bribery and Corruption

We know paying bribes can harm our reputation and cost millions in fines and fees. Criminal penalties may also be imposed on the individuals involved. However, corruption also has a disproportionate impact on developing economies, and the money from bribes and corruption often supports undemocratic regimes.

We have a zero-tolerance policy on bribery and corruption. It's not just illegal, it's completely contrary to our Core Values.



Learn more

Global Anti-Bribery and Anti-Corruption Policy

Also review **Doing Business with the Government** and **Gifts and Entertainment** sections of the Code.



Should I agree to make a payment to 'help move the permitting process along?' I was authorized to hire a consultant to help us get the local permits needed for a new project. They asked for a \$40,000 retainer to 'help move the process along.' I'm told this is a normal practice in that country. Should I agree to this payment?

No. Before making a questionable payment, consult the **Legal Department**.

I have suspicions about a supplier's business practices. What should I do? A representative of one of our suppliers claims they can help us win a contract with a customer. I think they are planning to offer lavish travel and entertainment to one of the customer's vice presidents. Should I do anything about this?

Yes. Anytime you are unsure about the appropriateness of travel and entertainment in relation to winning business, contact the **Legal Department**.



International Trade

Many laws govern the conduct of trade across borders, including laws designed to enforce sanctions and curtail money laundering. Other laws regulate exports or prohibit companies from cooperating with unsanctioned boycotts.

We comply with all export control and import laws and regulations. The Company will not do business with prohibited persons or entities. We obtain requisite export licenses and other government approvals prior to exporting products and technology regulated by the U.S. or a foreign government.

Money Laundering

To help prevent and detect money laundering and terrorist financing, watch for any suspicious payments. Those may include cash transactions, payments from personal accounts and funds from financial institutions or third parties without a logical relationship to the customer or business partner.

- If you receive a request to participate in a boycott or are asked about our position on a boycott, contact the **Legal Department** immediately.
- If there appears to be a conflict between laws, customs or local practice, contact the **Legal Department**.
- Trade sanctions are complex. If you are involved in transactions with a potentially sanctioned country, entity or person, be certain appropriate diligence has been completed.
- Always use the export classification of goods, software or technology to determine if they require government authorization for export.
- Any questions or concerns about trade compliance or potential violations should be directed to the **Legal Department**.

Definition

A boycott is the act of withholding commercial patronage from a company, country or other identifiable group (e.g., race, gender, etc.).



What if a supplier requests a change in payment location? A supplier has asked that we send payments to a new address. I'm suspicious that there might be something illegal or inappropriate going on. How should I proceed?

Since this may be an effort to launder money or to otherwise avoid legal requirements, you should contact the Legal Department immediately.

Also, do not change the address until the **Legal Department** approves the change. Avoid further discussions with the supplier about the request until you hear from the **Legal Department**.



Learn more

Global Trade Controls Policy



Doing Business with the Government

Special legal and contracting rules apply to dealings with governments. These include strict limits on gifts and entertainment, bidding or procurement requirements, special pricing, billing and accounting rules, reporting and document storage and retention requirements, and restrictions on subcontractors or agents we may engage.

- If you deal with domestic or foreign governments, know the laws applicable to these business activities, use sound judgment to avoid violating those laws and contact the **Legal Department** with any questions.
- Talk with the **Legal Department** when pursuing business with the government.
- Strictly follow the terms of government contracts. For example, do not make any substitutions for the goods and services to be delivered or deviate from requirements, without written approval.
- Ensure that subcontractors used to supply any goods or services for our government contracts have the appropriate contractual terms and conditions required by the government of our subcontractors.

Cooperating with Investigations

Always be polite and courteous to government authorities. Never mislead anyone, impede their work or conceal, destroy or alter documents. Notify the **Legal Department** immediately whenever there is a non-routine government visit or request for information. If they request information or inspections, only provide information or access if you have been cleared by the **Legal Department** to do so or you are certain that regulations require you to immediately respond to the authorities on site.



Learn more

Global Anti-corruption Policy and **Global Travel and Entertainment Policy**

Also see the **Gifts and Entertainment** section of the Code.



Should I pay for transportation and entertainment? *The technical supervisor working for our partner, a national company, wants to see our latest technology. They are paying for their own flights and hotel accommodations, but would like us to provide administrative support and local transportation. They also expect us to entertain them in the evening. Is this appropriate?*

Maybe. Since this involves a national company, the technical supervisor is a government representative. You can support visits of government representatives to our offices and sites, but only if all items are approved in advance by **Legal Department**. It is permissible to promote, demonstrate and explain the benefits of our products or technology to government representatives who are decision makers or potential partners, but you may never try to influence them by offering personal benefits.



Fair Competition

We believe in free and open competition. We gain our competitive advantages through the quality of our products and services, rather than through unethical or illegal business practices.

Every country in which we operate has laws that govern relationships with competitors, suppliers, distributors, and customers. Fair competition laws (also called “antitrust laws”) generally try to ensure that markets operate efficiently by providing competitive prices, customer choice and innovation. For example, use only lawful, ethical and publicly available sources in gathering information about our competitors.

Competition laws are very complex. Whenever you are in doubt about a potential issue, consult with the **Legal Department** as soon as possible.

Basic Antitrust Rules of the Road

The following guidelines address some of the most common antitrust situations:

- Do not discuss prices, terms and conditions of sale, discounts, credit terms, or similar subjects with competitors.
- Do not discuss current or future output, costs, marketing strategies, or other competitively sensitive information with competitors.
- Do not agree with a competitor to stay out of each other’s markets or to stay away from each other’s customers or associates.
- Do not coerce customers or others into setting specific prices or price ranges.
- Do not “tie” (that is, condition) the sale of one product to another.
- Do not reach agreements with dealers or customers to take any action with respect to another dealer or customer.
- Do not price below cost without consulting the **Legal Department**.
- Do not participate in benchmarking or statistical reporting of competitive information without clearance from the **Legal Department**.
- Do not ‘signal’ competitors regarding pricing strategies, and do not use customers or other third parties to ‘send the message’ about how the industry should behave.



What about conversations with competitors at trade association meetings? *During a trade association meeting, I was present when two of our competitors were discussing their low profit margins and complaining about deep discounts. I said nothing, but a few weeks later both competitor companies raised their prices. Should I have intervened at the meeting?*

No. If you find yourself in this kind of situation, loudly announce that the conversation is inappropriate, leave the meeting and immediately contact our **Legal Department**. An authority might conclude that everyone at the meeting – whether they took part in the conversation or not – tacitly agreed to price fixing, even though there was never an explicit agreement.

We Protect Our Reputation



Customer Focus & Partnership

Topics in This Section

- Accurate Recordkeeping & Financial Reporting
- Confidential Business Information
- Speaking on Behalf of the Company
- Political Activity & Contributions
- Service to Our Communities





Accurate Recordkeeping and Financial Reporting

The way we conduct our business matters and is vital to building trust in our Company. Investors, government officials and others rely on the accuracy and completeness of our business records and disclosures. Accurate and complete information is also essential internally so that we make informed, data-driven business decisions.

Our books and records must be accurate, timely, complete, and in compliance with accepted accounting principles and our internal controls and procedures.

Associates with finance or accounting jobs have a special responsibility in this area, but all of us contribute to recording business results and maintaining records.

- Make sure financial entries are clear, complete and do not hide the true nature of any transaction.
- Never understate, overstate or falsely report anything in the Company’s records.
- ‘Off the books’ bookkeeping, secret accounts, ‘slush’ funds and any other deception in recordkeeping are prohibited.
- Never make false claims on a time sheet or expense report.
- Speak up if you are not sure of the accuracy of information in a Company record.

Legal and Audit Holds

Documents should be destroyed only in accordance with applicable record management policy and the law. If you receive a “Legal Hold” or “Tax Audit Hold,” you must not alter or discard any relevant information. Contact the [Legal Department](#) if there is any doubt about the appropriateness of record destruction.



Learn more

[Internal Accounting Controls Policy](#)



Can I record an unconfirmed sale if my supervisor asks me to? My supervisor has asked me to record a sale in the quarterly report to meet our targets, but the sale will not be confirmed and completed until after the quarter ends. Should I do what she asks?

No.

Reporting a sale that is not yet complete would be a misrepresentation and could be considered fraud. If you are not comfortable addressing this with your supervisor, use a resource found in the [Ask Questions and Report Concerns](#) section of this Code.



Confidential Business Information

Our confidential business information (including information from customers and other business partners) must be treated carefully. Unauthorized release of confidential information can cause us to lose our competitive advantage, embarrass the Company and damage business relationships.

Examples of confidential business information include:

- Business plans
- Trade secrets
- Personal and financial information, including social security numbers and bank records
- Sales and profit figures
- Pricing and other contract terms
- New product or marketing plans
- Research and development ideas
- Manufacturing processes
- Our customer information, including to whom caskets are sold to

To minimize the likelihood of an unintentional disclosure of sensitive information, take reasonable precautions:

- Use and disclose confidential information only for legitimate business purposes.
- Password-protect documents with personal information or highly confidential information
- Do not store confidential information, including personal information, in non-Batesville locations, such as personal email servers or an associate's private electronic device, without proper approval.
- Properly label confidential information.
- Use strong passwords and protect them from disclosure.
- Do not allow other people, including friends and family, to use our information technology resources.
- Do not disclose confidential information to third parties, including business partners and vendors, without appropriate authorization and any required confidentiality agreement.
- Do not discuss confidential information in public places where others may overhear.
- Secure your computer and workstation, and never leave your laptop or mobile phone unattended, particularly when traveling.
- Do not request, obtain or share the confidential information of others – this includes former employers and competitors.



***How can I be sure if information is confidential or not?** It's clear to me that information about business plans, results of operations and potential acquisition are strictly confidential, but what about other types of information?*

The answer is simple: all Company-generated information that is not made public on our website, in a press release or permitted or required to be shared by law should be treated as confidential. If you are not sure whether a particular piece of information may be confidential, ask your supervisor or the **Legal Department**.



Speaking on Behalf of the Company

We need a clear and consistent voice when providing information to the public and the media. It is important that only designated associates speak publicly on behalf of the Company.

- Outside requests for financial or business information must be submitted for review by the Chief Financial Officer or General Counsel. Any other request for information must be referred to the Communications Department.
- Never give the impression that you are speaking on behalf of the Company in any communication that may become public, unless you are specifically authorized to do so.
- Obtain approval from the Communications Department before making public speeches, writing articles for professional journals or engaging in other public communications when you are speaking on behalf of the Company.

Using Social Media

Company announcements to be made and distributed using social media must be approved by Company leadership.

Be careful when writing communications that might be published online. Think carefully before you hit the 'send' button in an email or a text. When using social media:

- Use good judgment. Express ideas and opinions in a respectful manner.
- Be sure it is clear that any opinions you express in your social media communications are your own and do not reflect those of the Company.
- Don't disclose confidential business information about the Company, our customers or our business partners.
- If you see something online that could be potentially harmful to the Company, report it immediately to your supervisor or to the Communications Department. Don't respond to negative comments yourself.





Political Activity and Contributions

We believe in the right of associates to participate in the political process. However, political activity and contributions are heavily regulated, and lobbying and other political activity present significant compliance risks. Violations can result in fines or other sanctions, in addition to damaging our reputation. Therefore, it is crucial that associates consult with the Company's **Legal Department** regarding all political contributions or other similar activity by or on behalf of our businesses.

- **Contributions:** Consult with the **Legal Department** before making any political contribution by or on behalf of the Company or an associated political action committee (PAC) or creating an associated expense report. This requirement applies to all contributions, including those related to officials, candidates or issues.
- **Lobbying & Political Contact:** Consult the **Legal Department** prior to initiating any contact with any federal, state or local elected or appointed government official with the intent to influence government policy on behalf of the Company or associated PAC.
- **Communications:** Any direct or indirect use of the name of a Company business to reflect support or opposition to a candidate or issue must be pre-approved by the **Legal Department**.



Can I claim a fundraising dinner for a political candidate as an expense? I went to a fundraising dinner for a candidate for a local government office. This candidate takes positions favorable to our interests. Can I claim the dinner on my expense report?

No. This would be considered a political contribution and would violate our policies. You are free to attend political fundraising events as an individual, but you must not use Company assets or funds or give the impression that you are representing the Company. If you think your involvement might create a conflict of interest or appear inappropriate, discuss it with the **Legal Department**.



Service to Our Communities

We encourage associates to be active and try to make a positive difference in their communities. However, it is important to distinguish between acting on behalf of the Company or on your own.

- Do not make any charitable contribution on behalf of the Company unless you are authorized to do so.
- Soliciting or pressuring customers, business partners or other associates to support your favorite charities or causes is not permitted. (See also the **Political Activities and Contributions** section of the Code.)
- Do not solicit charitable contributions from associates without permission from Human Resources.



We Make Good Decisions



Spirit of Continuous Learning & Improvement

Topics in This Section

- Conflicts of Interest
- Gifts & Entertainment
- Use of Company Assets





Conflicts of Interest

A conflict of interest can occur whenever you have a competing interest that may interfere with your ability to make an objective decision for the Company.

Associates should never allow personal interests to influence their judgment on Company matters. Be proactive and avoid situations that can lead to even the appearance of a conflict of interest. If you question whether a situation will create a conflict of interest, talk with your supervisor or the **Legal Department**. The Company may choose to permit certain potential conflicts of interest, but you must ask permission in advance rather than after a conflict arises.

Being able to recognize a potential conflict can help you avoid one. Examples include:

- Holding a financial interest in a company that competes with, does business with or could otherwise affect the Company's business;
- Taking a job that may interfere with your job or tempt you to use Company working hours or equipment to carry out that job;
- Misusing Company resources or influence to promote or assist an outside business;
- Conducting business with or employing a spouse, relative or close personal friend, without authorization; and
- Taking advantage of a business opportunity you learned about through your work at the Company.





Gifts and Entertainment

Occasional gifts or entertainment are often viewed as a normal part of doing business, but sometimes even a well-intentioned gift can be too much.

Associates may only exchange modestly valued gifts and entertainment that are a reasonable complement to business relationships and do not improperly influence others. Do not accept or provide gifts or entertainment if the intent is to influence a decision or is in return for any business, services or confidential information. If you have questions about whether you can give or accept a particular gift or entertainment, contact your Human Resources representative or the **Legal Department**.

When exchanging gifts and entertainment, all of the following guidelines must be met:

- Any accepted gift must be of minimal value, not frequent, and its value and type should be comparable to what is customarily offered to others having a similar relationship with the supplier, customer or competitor.
- The gift must not give the appearance of influencing the business judgment of the recipient. This could be a bribe.
- There must be a reasonable business purpose.
- Gifts and entertainment must be accurately recorded, and records must reflect the true nature of the transaction.
- Associates should exercise judgment in deciding whether a gift or entertainment is of appropriate value. It is always better to decline in circumstances where there is doubt.





Gifts and Entertainment (cont.)

The following practices are never allowed:

- Giving or accepting lavish or frequent gifts or entertainment;
- Giving or accepting any gift of cash or a cash equivalent (gift cards, gift certificates) – except giving gift cards in limited circumstances is acceptable if pre-approved by the **Legal Department**;
- Giving or accepting any gift or entertainment that could be embarrassing or reflect negatively on you or the Company; and
- Giving or receiving any gift or entertainment that is known to violate the policies of the recipient’s organization.

Gifts and Entertainment – Government Officials

Extra care must be taken when dealing with government officials. Complex rules govern the giving of gifts and entertainment to government officials (which includes associates of state-owned entities). What may be permissible for commercial customers may be illegal when dealing with the government, and bribes are never permitted under any circumstances.

- No gifts or other benefits, including entertainment, should be offered to government officials.
- Any request made to an associate by a government official for a payment, other than legitimate taxes or fees, must be reported immediately to the **Legal Department**.



Learn more

Global Anti-bribery and Anti-corruption Policy, Global External Business Courtesies Policy, and Travel and Entertainment Policy

Also see the **Doing Business with the Government** section of the Code.



Can I accept a tip? I was delivering goods on behalf of the Company, and a customer was so pleased with my service that she offered me a tip. Can I accept it?

No.

Our Company’s policies prohibit accepting cash or cash equivalents from business partners, no matter the amount. You should politely decline the tip.



Use of Company Assets

Each of us is entrusted with the care of Company assets; we must protect them from loss, damage, theft, waste and improper use.

Company assets include physical property, facilities, equipment, vehicles, inventory and supplies, corporate opportunities, financial resources, intellectual property, confidential information, files and documents and computer networks and their content.

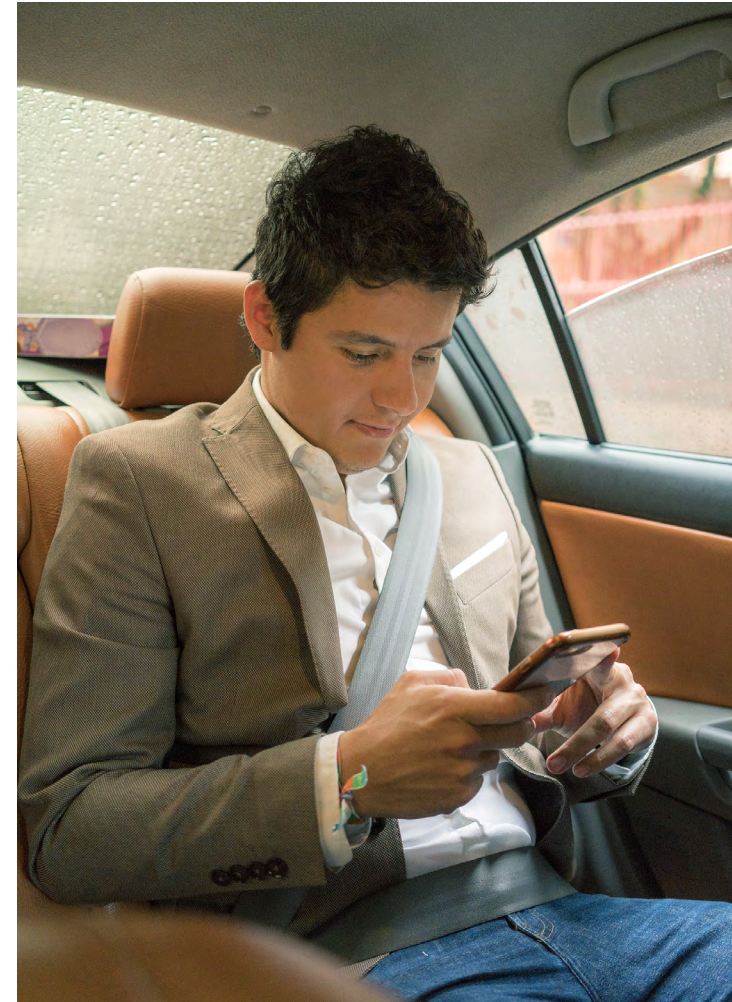
- You should have no expectation of personal privacy when using our systems.
- Our assets must not be given or sold to anyone without appropriate approval.
- Only use authorized software, devices and procedures.
- Company information technology systems (including email and voicemail systems) and the content on them are considered Company property.
- Limited personal use of phones and information technology systems is allowed as long as it does not have a negative impact on your performance, your productivity, the work environment or violate any Company policies.
- Inventions and ideas developed using Company assets belong to the Company and must be disclosed to your supervisor or the **Legal Department** for appropriate further action.

Intellectual Property

Our intellectual property includes the Company's patents, trademarks, trade secrets and copyrights. Trade secrets and other intellectual property in development must be kept strictly confidential and only used for the Company's benefit.

Any unauthorized disclosure or misuse of intellectual property during or after your employment could be harmful to the Company and will not be tolerated.

If you have questions or concerns about the appropriate use of proprietary information or intellectual property, please use a resource found in the **Ask Questions and Report Concerns** section of this Code.





Use of Company Assets (cont.)

Cybersecurity

We are all increasingly dependent on networks, databases and the information they contain. Each of us must do our part to protect our data and information systems from a data breach:

- Follow our policies and practices that are designed to protect our networks, computers, programs, and data from attack, damage or unauthorized access.
- Protect your usernames and passwords.
- Do not grant access to your account through Multi-Factor Authentication, unless you were the one who prompted the access request.
- Be alert to email phishing scams or other attempts to uncover sensitive personal or corporate information.
- Be sure the appropriate contractual and information security controls are in place before sharing our data with our vendors, or allowing access to our system.
- Don't open suspicious links in emails, even if you think you know the source. You can call the sender of an email to verify they sent it.

If you have any questions, contact or identify a potential security incident, please contact Batesville's Security team immediately. Please raise any concerns as to compliance with this Code or our Policies, please visit our

[Ask Questions and Report Concerns](#) section of the Code.



Learn more

[Review our IT Policies](#)



A Note from Our General Counsel

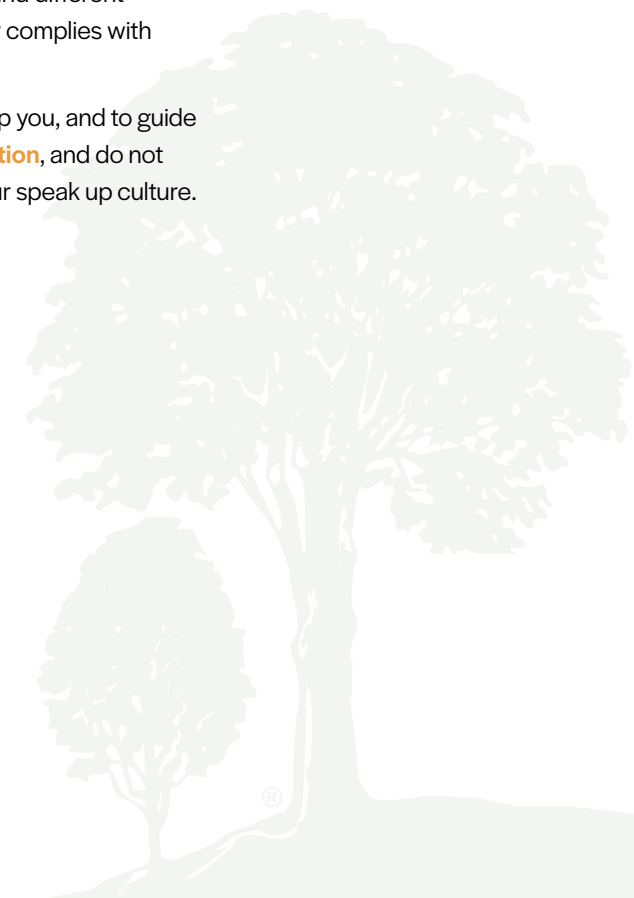
Thank you for reviewing our Code of Ethical Business Conduct, and the Core Values that form its foundation. It sets forth our expectations for how we do business, how we treat our associates and others, and how we comply with applicable laws.

Our Company policies and procedures should be read in conjunction with this Code. We operate in a complex world where laws and regulations that impact us change often, imposing new and different requirements on our business. We are counting on your vigilance to ensure our Company complies with those standards.

Always remember that the resources mentioned throughout the Code are available to help you, and to guide you in making good decisions. Please see our [Ask Questions and Report Concerns Section](#), and do not hesitate to contact me if you have questions or suggestions on how we can strengthen our speak up culture.

Thank you,

Lyn Hils Mathews
Senior Vice President, General Counsel





A Final Word

The Company supports an associate's right to speak out about matters of public concern or engage in certain activities related to the terms and conditions of their employment. Nothing in this Code or in any of our policies prohibits an associate from reporting possible violations of federal, state or local laws or regulations to any government agency or entity.

The provisions of this Code are in addition to, and do not modify, replace or supersede other policies or procedures, with the exception that it replaces any prior Code of Ethical Business Conduct.

This Code does not constitute a contract of employment between the Company and its associates.

Each Company associate is employed by the Company on an at-will basis (unless otherwise agreed upon in writing and subject to applicable laws). At-will employment means employment is not guaranteed for any specific amount of time, and the Company retains the right to terminate an individual's employment at any time with or without cause or notice. No oral representations made by any Company associate with respect to continued employment can alter this relationship.

Resource contact information

Legal Department:

Lyn Mathews
Senior Vice President, General Counsel
Ethics@batesville.com

Reporting Hotline:

U.S. (including P.R.): 844-719-6100
Canada: 844-719-6101
Mexico: 800-880-0773

Mobile:



EthicsPoint:

[Batesville.ethicspoint.com](https://www.batesville.ethicspoint.com)

