

139 Victor Street
St. Louis, Missouri 63104
800-255-3590 main
314-772-4400 main
314-772-0744 fax
www.hagerco.com

CORPORATE CODE OF ETHICS

The core purpose of Hager Companies (the "Company") is to provide superior door hardware to its customers at a highly competitive price with impeccable customer service, thereby creating value for its customers. In pursuit of this goal, the Company is committed to the highest standards of ethical business conduct. This Corporate Code of Ethics Policy (the "Policy") along with the Company's corporate values provide the standards by which the Company operates.

Hager is proud of its reputation for maintaining the highest standards for manufacturing/distributing quality door hardware and of ethical business conduct. All employees are responsible for protecting and maintaining the reputation of the Company. To that end, this Policy is designed to help clarify the ethical and legal standards to which the Company adheres in performing its work.

Each director, officer and employee of the Company is expected to comply with the Policy, in order to ensure that the Company operates in a manner consistent with its obligations to shareholders, customers, sales representatives, suppliers and to the communities in which it functions.

The Company is strongly committed to the highest standards of ethical conduct in every aspect of its dealings with these stakeholders and will rigorously enforce compliance with its policies and procedures and the government laws and regulations affecting its business.

The California Transparency in Supply Chains Act requires certain disclosures regarding slavery and human trafficking. The Company is committed to conducting business in an ethical manner, and we expect our suppliers to have the same level of commitment. We select suppliers who support our values and expect them to comply with all applicable laws and regulations. We do not currently verify our product supply chain, or audit suppliers to evaluate risks of slavery and human trafficking, or require our direct suppliers to certify that materials incorporated into products comply with laws regarding slavery and human trafficking in the countries in which they are doing business.