Social Responsibility Policy and Code of Conduct

PlayPower achieves financial and commercial success by conducting its businesses based upon ethical values that promote respect and care for its employees, its customers, the children and people who enjoy its recreational products, and the communities it serves. PlayPower accepts and embraces its social responsibility to protect the environment by conserving the world's natural resources through lean manufacturing processes that utilize sustainable materials. PlayPower governs itself as a good corporate citizen of the world and conducts its business ethically and free from corrupt practices, while always promoting and protecting human rights throughout the world. PlayPower aims to grow and achieve maximum financial performance for its stakeholders by providing meaningful avocations and life sustaining income to its many employees, by providing communities innovative, quality products that improve their citizen's life experiences, and by having a positive impact on the people of the world, and the world's environment.

Code of Conduct

PlayPower's Social Responsibility Policy and Code of Conduct is intended to guide the conduct of all of the directors, officers, employees and representatives of PlayPower and its subsidiary companies. Each of these individuals is responsible for making sure that PlayPower's business decisions and actions comply at all times with the intent of this Social Responsibility Policy and Code of Conduct.

Ethical Corporate Governance. PlayPower will:

- 1. Always act in the best interest of its employees, its customers, world citizens and the environment, while always striving to maximize financial performance for its stakeholders.
- 2. Provide its customers with innovative, quality, reliable, safe and environmentally friendly products that enhance the human experience.
- 3. Conduct its business pursuant to the highest industry standards and best practices, and always in an ethical and socially responsible manner.
- 4. Be open, conscientious, honest and receptive to the needs and concerns of its employees, its customers, the communities it serves, and its stakeholders, and will communicate with them promptly, completely and accurately.
- 5. Comply with its legal and financial obligations.
- 6. Honestly and accurately account for its business transactions and activities pursuant to accepted standards and practices such as Generally Accepted Accounting Principles, and will cooperate fully with its internal and independent auditors.

- 7. Comply with the laws, rules and regulations of the countries and communities in which it operates.
- 8. Compete in its industries vigorously, independently, ethically and fairly, and will not act in derogation of antitrust or competition laws in any of the jurisdictions in which it does business.
- 9. Fully comply with the U.S. Foreign Corrupt Practices Act ("FCPA") and the anti-corruption laws of other countries where the company does business. The company and its employees and representative will never offer, pay, solicit or accept bribes in any form, either directly or indirectly.
- 10. Honor and uphold its fiduciary duties, and its officers, managers, and employees will never put their personal interests ahead of the interests of the company or its financial stakeholders.

Social Responsibility, Health and Safety. PlayPower will:

- 11. Support and be an asset to the communities in which it operates by providing employment, investing in infrastructure and supporting local initiatives.
- 12. Offer its employees functional education and job training opportunities to help advance their personal and professional development.
- 13. Strive for continuous operational improvement to minimize its environmental impact.
- 14. Offer its employees compensation packages that include medical and dental benefits, retirement programs, and services such as employee assistance counseling, employee discounts and length-of-service awards. PlayPower will compensate its employees with wages and benefits that meet or exceed the legally required minimum.
- 15. Provide its employees a fair, just and professional workplace, and will not tolerate any form of discrimination or harassment directed at any individual or group, regardless of race, color, age, gender, sexual orientation, gender identity and expression, ethnicity, religion, disability, national origin or any protected class.
- 16. Encourage employees to report any incidents of discrimination, harassment, and unfair or unsafe work conditions, and to raise questions, concerns or issues they may have about such matters to their supervisors
- 17. Take all such concerns, questions and complaints seriously and handle them promptly, confidentially and professionally, without any form of retaliation to the reporting employee.
- 18. Provide a healthy and safe workplace and practice operational processes that enable its employees to work free of incident, injury and illness.
- 19. Train its managers and employees and make them accountable for preventing work related injuries and illnesses, and provide appropriate wellness programs that contribute to the productivity, health and well-being of employees.

- 20. In keeping with its commitment to ethical business practices, social responsibility and good corporate citizenship, acknowledge and respect the fundamental principles contained in the Universal Declaration of Human Rights and in the United Nations Global Compact's (UNGC) Ten Principles in the areas of human rights, labor, environment, and anti-corruption.
- 21. Support and respect the protection of internationally proclaimed human rights and make certain that it is not complicit in human rights abuses.
- 22. Respect the rights of employees to collectively bargain where employees have unionized in accordance with local laws and established practice
- 23. Reject and condemn all forms of forced or compulsory labor.
- 24. Rejects and condemn all forms of child labor and actions intended to exploit children.

Environmental. PlayPower will:

- 25. Comply with all applicable environmental, health and safety regulations and laws, and all applicable industry standards and guidelines with respect to its operations, products and services.
- 26. Operate an environmental, health and safety management system aligned to the requirements of ISO14001, and that ensures continuous improvement through risk assessment, risk minimization, and performance reporting.
- 27. Operate in a manner that is committed to continual improvement in environmental sustainability through recycling, waste minimization, conservation of resources, prevention of pollution, product development, management of hazardous materials, and promotion of environmental responsibility amongst its employees.