

Nortek's Compliance with the California Transparency in Supply Chains Act of 2010

The California Transparency in Supply Chains Act of 2010 was designed to increase the amount of information made available by retailers and manufacturers regarding their efforts to address human trafficking and slavery, thereby allowing consumers to make better and more informed choices regarding the products they buy and the companies they choose to support.

We at Nortek, Inc. and our affiliated companies (collectively, "Nortek") believe that workers at our facilities and at our suppliers' facilities have the right to freely choose employment and not be subjected to exploitation as a condition of employment. Nortek is committed to providing a supportive, professional, and respectful work environment for our own employees, and we would never knowingly conduct business with a supplier who engages in forced labor, child labor, human trafficking, or slavery. To this end, we have taken steps to better ensure the absence of these prohibited activities in our supply chain.

Our Supply Partners Code of Conduct (the "Supply Partner Code") seeks to proactively combat the problem of human trafficking and slavery by holding our supply partners accountable to take greater social responsibility for their participation in the global economy. As part of a collaborative effort to ensure that forced labor and human trafficking do not occur in the supply chain, the Supply Partner Code requires that our partners:

- Comply with all national and local laws, including those relating to labor, human trafficking, and slavery;
- Ensure that, in all of the stages of the process to provide products to Nortek, all labor is voluntary, and that (i) child, forced, bonded, prison, or indentured labor has not been used; (ii) workers have maintained control over their identity documents; and (iii) workers have been given rest days and the working hours are consistent with local regulations and not excessive;
- Use hiring practices that accurately verify age and ability to work legally;
- Are committed to a workplace free of harassment, unlawful discrimination, and harsh and inhumane treatment; and
- Pay all workers at least the minimum wage and benefits required by applicable laws and regulations.

The Supply Partner Code is available on Nortek's Website at [<http://www.nortek.com/investors/?isrc=irol-govhighlights>] and a copy is also provided to our suppliers in connection with the supplier onboarding process.

Furthermore, Nortek's standard contractual terms – including the terms and conditions of purchase and standard supply agreement for use with strategic suppliers – require that suppliers comply with all Nortek policies, as well as all applicable laws and regulations, including those relating to human trafficking and slavery. In addition, Nortek's standard supply agreement specifically requires that suppliers manufacture products and parts without the use of child labor or prison labor and in adequate working conditions reasonably providing for the health and safety of the supplier's employees.

Nortek recently implemented a robust supplier selection and administration process, including a supplier registration protocol that requires suppliers to agree to comply with the Supply Partner Code. Nortek does not otherwise engage in a verification of its product supply chains specifically to evaluate and address the risks of human trafficking and slavery. Nortek visits certain supplier sites and, upon discovery of any evidence of human trafficking or slavery, would take remedial actions. Nortek does not otherwise conduct

audits of its suppliers specifically to evaluate compliance with company standards for trafficking and slavery in supply chains.

Nortek's employees are bound by a company-wide Code of Business Conduct and Ethics (the "Employee Code"), which requires employees to report all legal, ethical, and policy violations, either internally and through a variety of anonymous resources. The goal of the Employee Code is to achieve a supportive, professional, and respectful work environment. Among other things, it addresses such topics as equal opportunity, non-discrimination, and the importance of a safe, healthy, and harassment-free workplace. The Employee Code also requires that employees obey all laws, which include laws against forced labor and human trafficking. Nortek's employees are required to take annual trainings on, and to certify adherence to, the Employee Code. In addition, Nortek provides those employees and managers who have direct responsibility for supply chain management with training on human trafficking and slavery, particularly with respect to mitigating risks within supply chains.

Nortek maintains internal accountability standards and procedures through the establishment of a 24-hour hotline to enable its employees and supply partners to report violations of Nortek policies, or any unethical or illegal conduct that has been observed.

E-mail: ethics@nortek.com

Telephone: 888-475-6620

Web Portal: nortek.silentwhistle.com

Reports made through any of the foregoing channels will be thoroughly investigated and addressed appropriately.

We want to be a company known for ethical leadership – a company where employees are proud to work and a company with which customers and suppliers want to do business. We gain trust by treating others with integrity, respect, and fairness. We must continue to demonstrate these values every day and in all of our interactions, one day at a time. We will continue to strengthen our awareness program to keep compliance in mind.