

NEENAH INC

ETHICAL PURCHASING POLICY

This Policy was issued by Michael D. Woody, Vice President U.S.
Procurement on December 1, 2011

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Ethical Purchasing Policy

Sustaining an ethical procurement and supply program

Neenah Inc. is committed to being a responsible corporate citizen by conducting business ethically and with integrity to benefit society as well as our stakeholders, employees, customers, investors and more. Neenah Inc. likewise believes that wherever we are in the world, certain universal and minimum standards of business conduct from our suppliers must also be expected. Neenah Inc. has an obligation to ensure its purchasing practices and standards place a priority on promoting safety, protecting the environment, and valuing human rights.

Neenah Inc.'s Ethical Purchasing Policy

Neenah Inc. will purchase goods and services which are produced and delivered under conditions which do not abuse or exploit any person or the environment. It is each employee and supplier's responsibility to ensure that our products and services are obtained from sources which respect safety, health, environment, product stewardship, product quality, social, legal and ethical standards, and sustainability requirements as defined below.

These requirements form the backbone of the evaluation and selection criteria for goods and services purchased by Neenah Inc. Neenah Inc. will seek alternative sources where the conduct of suppliers violates any of these standards or policies and where there is no effort by the supplier to address the situation within an agreed time period.

Neenah Inc. expects certain minimum standards of performance, business behavior, and legal and ethical compliance from its suppliers and everyone associated with Neenah Inc., including employees that deal with suppliers. These minimum standards are:

Safety, Health and the Environment

- We are committed to excellence in safety and health. There are no higher priorities for us than the safety of our colleagues, customers, suppliers and local communities. We are committed to a goal of zero injuries, believing that all are preventable. Consequently, Neenah Inc. will work to only trade with suppliers who place a high regard on safety.
- We are committed to protecting our natural resources. Neenah Inc. will carefully consider any relationships with organizations that are proven to violate locally applied pollution legislation or good sustainability practices. If our relationship is deemed a risk and the organization in question fails to resolve its behavior or performance, we will seek to terminate the relationship.

Labor and Human Rights

- Neenah Inc. will:
 - trade with suppliers who observe the UN's Universal Declaration of Human Rights (UDHR). Where a supplier is found to be in gross violation of the principles of the

declaration, we will advocate a change of practice, working with the supplier to highlight concerns and develop mutually acceptable solutions. If this process fails, we will terminate the relationship;

- trade with suppliers who pay their employees' wages and benefits that meet local industry benchmarks and national minimum requirements;
- avoid suppliers who impose excessive working hours and poor or unsafe working conditions on their employees;
- trade with suppliers who do not discourage or prevent their employee from joining trade unions and other workers' associations;
- not trade with suppliers who abuse or intimidate their employees;
- only trade with suppliers who work within the laws of their country;
- support the elimination of child, forced and slave labor. In this regard, Neenah Inc. has pledged its support for the UN Global Compact.
- not trade with suppliers that use any prison, forced, indentured or bonded labor.
- only trade with suppliers that comply with all current or later adopted laws, rules and regulations of the country in which they are doing business regarding use of child labor.
- require suppliers to certify that the materials incorporated into their products comply with the laws regarding slavery and human trafficking of the country in which they are doing business.

Conflict-Free Minerals

In August 2012, the U.S. Securities and Exchange Commission ("SEC") adopted final rules implementing Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, also known as the "Conflict Minerals Rule." Under these rules, publicly traded companies must annually report to the SEC whether products they manufacture or contract to manufacture contain specific "conflict minerals" originating from the Democratic Republic of the Congo or adjoining countries ("the DRC"). The conflict minerals are columbite-tantalite (tantalum), cassiterite (tin), gold, wolframite (tungsten). If public companies determine they are subject to the Rule, they must conduct a "country of origin" inquiry reasonably designed to determine whether any conflict material used originated from the Democratic Republic of the Congo or adjoining countries (collectively, the "DRC Region").

Neenah Inc. therefore:

- Is committed to compliance with the requirements of the Conflict Minerals Rule and to any further action that ensures the protection of human rights.
- Expects its suppliers to:
 - source materials from socially and ethically responsible suppliers;
 - identify any conflict minerals in products supplied to Neenah Inc. and the origin of such minerals; and
 - provide information to Neenah Inc. to aid in Neenah Inc.'s ability to comply with the Rule.

Supplier Relationship Expectations

- We recognize the safety, health, environment, social, legal and ethical impacts of all supply and procurement decisions, and will involve our suppliers in addressing issues that may arise. We expect our suppliers to assist us in minimizing any negative effects and neutralizing any risks.
- Neenah Inc. reserves the right to terminate any relationship in which a supplier fails to meet our quality, legal and ethical standards, after appropriate consultation.
- We have adopted and developed supply strategies that attempt to achieve best value for money that meet our needs and are within legal and ethical standards.
- We expect:
 - employees of both Neenah Inc. and our suppliers not to deliberately mislead each other, or take advantage of genuine errors made by either party. Where errors are found to have occurred, both parties will endeavor to take the action necessary to remedy the situation and minimize the impact of any false information or error to each other;
 - Neenah Inc. employees to act impartially and objectively in all their purchasing activities and to keep records where appropriate to demonstrate that their actions have been fair and above reproach;
 - our suppliers to keep records where appropriate to demonstrate that their actions have been fair and above reproach;
 - employees and suppliers to maintain an unimpeachable standard of integrity in all their business relationships and to foster the highest possible standards of professional competence in all their supply activities;
 - employees and suppliers to comply with the law of the countries in which they operate and with which Neenah Inc. deals, and in all contractual obligations incurred by or on behalf of Neenah Inc.

Our Contract with Suppliers

By agreeing to supply Neenah Inc., suppliers are required to accept our ethical purchasing policy as part of Neenah's terms and conditions of purchase. Our suppliers must agree to work with us to continuously improve compliance to the standards both within their own company and those of their own suppliers. The implementation of the ethical purchasing policy is a shared responsibility between Neenah Inc. and its suppliers, reinforced by Neenah Inc.'s Code of Business Conduct and Ethics and the supplier's own social responsibilities.

In line with the Code, Neenah Inc. will:

1. Communicate its commitment to the Ethical Purchasing Policy and Code of Business Conduct and Ethics, to employees and suppliers.
2. Provide guidance to suppliers to promote and implement the policy's standards into their own business processes and in their relevant supply chains.
3. Seek to continually improve the way in which suppliers are appointed and supplier relationships are managed, audited and reported.

Neenah Inc. expects its Suppliers to:

1. Ensure that their products and services are produced and delivered in line with all laws, local regulations and best industry standards and practices.
2. If requested by Neenah Inc., report progress on implementing the ethical purchasing policy by describing actions taken and detailing future planned activity.

3. Accept responsibility for adopting and implementing acceptable safety, environmental, product quality, product stewardship, labor, human rights, social and legal standards under which products are made and services provided. This includes all work contracted or sub-contracted.
4. Highlight to Neenah Inc. any areas of legal or ethical concern so that both organizations can have a constructive dialogue about resolving any gaps and deficiencies.
5. Seek continuous improvement in the way the company produces and delivers its products and services and manages its supplier relationships.
6. Communicate to Neenah Inc. any practices which could damage Neenah Inc.'s reputation.

Both Parties will:

1. Work together as far as possible to highlight and neutralize areas of risk and concern and non-compliance.
2. Ensure the immediate cessation of serious breaches of the ethical purchasing policy and, where these persist, terminate their business relationship.
3. Ensure all employees are aware of their individual obligations under Neenah Inc.'s Ethical Purchasing Policy and Code of Business Conduct and Ethics.
4. Recognize official regulation and inspection of workplace standards, and the interests of legitimate trade unions and other representative organizations.

Terms and conditions

Adherence to Neenah Inc.'s Code of Business Conduct and Ethics policy is a key component of terms and conditions of doing business with Neenah Inc. As a demonstration of this, Neenah Inc. includes the following clause into all of our standard terms and conditions of purchase:

“The Supplier acknowledges the Neenah Inc. Code of Business Conduct and Ethics and Ethical Purchasing Policy covering areas such as labor, human rights, safety, health and the environment. Copies of the Ethical Purchasing Policy and the Code of Business Conduct and Ethics may be viewed at www.Neenah.com and are available from Neenah Inc. on request. Neenah Inc. expects the Supplier to maintain a consistently high standard of integrity in all its business relationships with Neenah Inc. and to foster the highest possible standards of professional competence in all its activities. To this end, in supplying goods and/or services to Neenah Inc., the Supplier agrees that to abide by the Code of Business Conduct and Ethics and the Ethical Purchasing Policy. Further, no Neenah Inc. employee or officer is authorized to propose to the Supplier or approve conduct inconsistent with the Code of Business Conduct and Ethics. Supplier certifies that the materials incorporated into its products comply with the laws regarding slavery and human trafficking of the country in which it is doing business.”

Neenah Inc. shall have the right to terminate its business relationship and any associated agreements with the Supplier if the Supplier violates the Code of Business Conduct and Ethics or the Ethical Purchasing Policy (or Neenah Inc. reasonably believes that the Supplier is in violation of either policy) in the case of breaches which are capable of remedy, the Supplier fails to remedy such breach, after written notification by Neenah Inc. of such breach, within the cure period specified by Neenah Inc. for such remedy. In determining the length of any cure period Neenah Inc. shall act reasonably, having regard to the severity and nature of the breach.”