Snap-on Incorporated

November 2018

Dear Snap-on Supplier,

Since 1920, Snap-on has focused on serving our customers, associates, investors, franchisees, suppliers and the communities where we do business. Guided by our core beliefs and values as laid out in our "Who We Are" statement, Snap-on's commitments to integrity and social responsibility extend to its worldwide supply base.

Integrity in our Supply Chain is critical to the overall success of Snap-on Incorporated, and to your success as a Snap-on business partner.

As the holiday season approaches, I would like to take this opportunity to remind you of Snap-on's policy with respect to gifts and other business courtesies:

Suppliers must not offer or give any payments, fees, loans, services or gifts to any Snap-on associate as a condition or result of doing business with Snap-on. Snap-on policy does not prohibit gifts of nominal value (under \$50). Normal business meals and entertainment (such as attendance at sporting or cultural events), as well as similar customary and reasonable expenditures to promote general business goodwill, are acceptable even if their value exceeds \$50, so long as the associate is accompanied by the host.

The Snap-on Supplier Code of Business Conduct can be found at: https://www.snapon.com/EN/Suppliers/Supplier-Code-of-Conduct

The Supplier Code of Business Conduct should be reviewed from time to time for your own benefit. Suppliers are expected to report any potential solicitation of a kickback from any Snap-on associate to Snap-on's Business Ethics Help Line at 866-468-6657 or to Snap-on's Vice President, General Counsel and Secretary at: 2801 80th Street, Kenosha, WI USA, 53143.

Gift giving by suppliers, though most often well-intentioned, nonetheless tends to create awkward situations for Snap-on rather than fostering goodwill in the relationship. I therefore recommend that Snap-on suppliers refrain from giving any gifts to Snap-on associates.

Snap-on wishes you and your employees a joyous holiday season.

Sincerely,

Govind K. Arora Vice President, Worldwide Strategic Sourcing