



SUPPLIER CODE OF CONDUCT

Pemco International (“Pemco”) is committed to complying with the laws applicable to our business around the world. This Supplier Code of Conduct (the “Supplier Code”) is to help ensure that our suppliers understand and comply with those laws and Pemco’s expectations.

Overview. A Pemco supplier is any third party with which Pemco has an active commercial relationship for the supply of goods or services. This includes suppliers of raw materials and machinery, suppliers of other goods and services, contractors, consultants, and brokers. Pemco reserves the right to add to or modify this Supplier Code from time to time, and suppliers must comply with the latest version of this Supplier Code.

Principles of the Supplier Code. All Pemco suppliers must adhere to the following principles:

Compliance with Law – Suppliers must comply with the words and spirit of all applicable laws, rules, regulations and orders of all government bodies in the performance of their business.

Human Rights/Employment Practices/Health & Safety – Pemco expects suppliers to support and respect the protection of human rights. Pemco expects suppliers to follow accepted employment practices and to prioritize health and safety. In particular, Pemco expects that suppliers will:

- not employ anyone under the legal working age.
- not permit the use of forced or compulsory labor, slavery or human trafficking in their own facilities or in their supply chain.
- provide a workplace free from harassment, including sexual, verbal, physical or demonstrative behavior that creates an offensive, hostile or intimidating environment.
- not discriminate against current or prospective employees on grounds of race, ethnicity, color, national origin, ancestry, nationality, citizenship, religion, age, gender (including gender identity or expression), sexual orientation, disability, genetic information, uniformed service, veteran’s status or any other characteristic protected by applicable law, ordinance or regulation.
- endeavor to provide a safe work environment in compliance with all applicable laws and best industry practices in order to minimize accidents, injury and illness during the course of work.
- recognize the rights of freedom of association and collective bargaining under applicable law.
- comply with all applicable labor laws, including those related to wages, overtime, vacations, absences, disability, maximum working hours and legal right to work.

Sustainability. Sustainability is a basic value at Pemco, and it is essential that suppliers understand and are aligned with our sustainability values. We encourage our suppliers to continuously work to implement sustainable development principles like the ones in this Supplier Code in their own operations and in their supply chain.

Environment – Pemco expects suppliers to conduct business in accordance with applicable environmental laws and recommends that suppliers adopt sustainable practices in the conduct of their operations so as to conserve natural resources and minimize environmental impacts.

Business Integrity and Anticorruption. To support Pemco’s values of ethics and fair dealing, suppliers must comply with the following:

Antitrust/Competition Law Compliance – Suppliers must comply with the antitrust and competition laws of the countries in which they do business. For example, suppliers may not engage in collusive bidding, price fixing, price discrimination or any other unfair trade practices in violation of applicable antitrust and competition laws.

Anti-Bribery/Anti-Corruption – Suppliers shall not make, offer, or promise any improper payment or business courtesy to Pemco personnel. Reasonable, noncash gifts having a token or nominal (modest) value, as well as reasonable meals and entertainment for legitimate business purposes, may be permissible depending on the circumstances. Giving any Pemco personnel a cash gift (including cash equivalents such as gift cards, stocks or bonds) or any personal loan is strictly prohibited regardless of value.

Conflicts of Interest – Pemco expects its suppliers to immediately report to Pemco any actual or potential conflict of interest that may arise in our relationship.

Confidentiality – Suppliers who receive information from or on behalf of Pemco on a confidential basis shall maintain that confidentiality and shall use the information only in the performance of their obligations to Pemco.

Data Protection – Suppliers shall respect privacy rights and comply with all applicable laws relating to data protection and data security.

Financial Controls – Suppliers shall maintain strong financial controls and keep complete and accurate records of all business operations and transactions involving Pemco in accordance with applicable retention policies and laws. Participation in money laundering or the financing of terrorists or criminal activities in any way is strictly prohibited.

Intellectual Property Protection – Suppliers shall respect the intellectual property rights of Pemco. Suppliers must comply with their legal and contractual obligations to Pemco and protect all intellectual property provided to them.

International Trade – Suppliers shall comply with all applicable trade laws, including US and EU trade sanctions laws, export controls laws, import laws and laws regarding supply chain security.

Origin Mapping – Suppliers must be capable of disclosing potential sources of primary origin associated with products or services provided to Pemco. If requested by Pemco, suppliers will provide supply chain mapping back to the origin. This obligation applies to, for example, conflict minerals covered by US law.

Continuous Improvement. Pemco strives for excellence and pursues continuous improvement. Suppliers should do the same, including through the following steps:

- Continuously improve products and/or services so as to improve quality, reduce cost and reduce the impact of their products on the environment.
- Maintain accurate supply chain records.
- Set targets and implement action plans for reducing environmental impacts.
- Strive to reduce their environmental footprint.
- Source raw materials from sustainable sources whenever possible.

Policies. Pemco recommends that suppliers implement appropriate policies, management systems, procedures and staffing to meet the expectations of this Supplier Code. Pemco expects suppliers to effectively communicate to their personnel the standards to which the supplier is committed, as well as relevant laws, regulations and protections.

Proof of compliance. Pemco reserves the right to require proof of compliance with this Supplier Code (or the equivalent provision of a supplier's code of conduct). Pemco may require such proof in the form of a certification of compliance, a review of the supplier's supporting documentation and records or other appropriate evaluative format. If the supplier is not in compliance, Pemco reserves the right to review the non-compliance with the supplier and require the supplier to take corrective measures to cause compliance. In addition, there can be significant civil, administrative, and even criminal penalties for violations of the laws and other requirements addressed in this Supplier Code. In addition, any supplier who violates the Supplier Code may be terminated or reported by Pemco to local authorities.

Nothing in this Supplier Code is meant to supersede any more specific provision in a particular contract, and to the extent there is any inconsistency between this Supplier Code and any other provision of a particular contract, the contract provision will control.