



Producers of Specialty Chemicals

# Struktol Company of America, LLC

201 E. Steels Corners Road • P. O. Box 1649 • Stow, Ohio 44224-0649  
(330) 928-5188 • customerservice@struktol.com • www.struktol.com

## SUPPLIER CODE OF CONDUCT

Struktol Company of America, LLC (“Struktol”) is committed to the highest standards of business ethics and integrity and to working with suppliers that share the same commitment and values. This Supplier Code of Conduct (the “Code”) is intended to ensure Struktol’s standards of ethical conduct are upheld in all of its business relationships in order to maintain Struktol’s outstanding reputation. Therefore, this Code applies to all people and companies (“Suppliers”) that do business with Struktol. Struktol’s Suppliers are expected to conduct their businesses honestly, ethically, and in accordance with all laws, regulations, and this Code. By continuing in its business relationship with Struktol, Suppliers agree and acknowledge that they will act in accordance with the following principles:

### **I. COMPLIANCE WITH THE LAW**

Suppliers must operate in full compliance with all applicable local, state, federal, and international laws and regulations, including all environmental, health, safety, and security (“EHSS”) laws, of the jurisdictions in which they do business and also in compliance with this Code. Struktol expects its Suppliers to implement these principles and obligations throughout their own supply chains.

- **ANTI-CORRUPTION** Suppliers are required to comply with the anti-corruption laws of the countries in which they do business and with the United States Foreign Corrupt Practices Act (“FCPA”). Suppliers may not make or coordinate any direct or indirect payment or promises of payment or other benefits to government officials for the purpose of inducing that individual to use his or her position to obtain or retain business or any other improper benefit.
- **ANTI-TRUST** Suppliers must not fix prices or coordinate market conduct with competitors or their own suppliers in a way that improperly restricts competition. Suppliers must not exchange current, recent, or future pricing information with competitors. Suppliers must refrain from participating in a cartel or any kind of association or arrangement that affects competition in a manner not allowed by the applicable laws and regulations.
- **INSIDER TRADING** Suppliers and their personnel must not use material, non-public information obtained in the course of their work with Struktol as the basis for stock trading or to enable others to trade on inside information.
- **COUNTERFEIT PARTS** Suppliers are expected to develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be able to be in place to detect counterfeit parts and materials, to exclude them from the delivered product, and to provide notification to recipients of counterfeit products when warranted.
- **CONFLICT OF INTEREST** Suppliers and Struktol employees are required to avoid transactions or activities that result in, or give the appearance of a conflict of interest



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between personal interests and Struktol's interests. If any Struktol employee or Struktol employee's family member receives any direct or indirect benefit from Supplier, then the Supplier and the Struktol employee must immediately notify Struktol in writing identifying the conflict at which time the Struktol employee will be precluded from engaging or participating in any contact negotiations between Struktol and Supplier.

- **GIFTS, GRATUITIES, MEALS, AND ENTERTAINMENT** Struktol strictly prohibits Suppliers from offering to, or accepting from, Struktol employees or representatives any gifts or gratuities of greater than \$100 US dollars. Cash gifts or gratuities are strictly prohibited regardless of amount. Ordinary business meals and gifts of nominal value are permissible so long as they are consistent with local laws, custom, and practice; are not extravagant, improper, or inappropriate; impose no sense of obligation; and do not, and are not expected to, result in any special or favored treatment.
- **BUSINESS AND FINANCIAL RECORDS** Suppliers are expected to honestly and accurately record and report all business information and comply with all applicable laws regarding their completion and accuracy.

## II. LABOR PRACTICES AND HUMAN RIGHTS

- **CHILD LABOR** Suppliers will comply with applicable local child labor laws and employ only workers who meet the applicable minimum legal age requirement for their location. In the absence of local law, Suppliers shall not employ children under the age of fifteen (15) in accordance with International Labor Organization ("ILO") Convention 138. Suppliers shall not employ workers under the age of eighteen (18) in hazardous positions.
- **COMPENSATION AND WORKING HOURS** Suppliers shall comply with applicable wage and hour labor laws including those related to minimum wages, overtime hours, and legally mandated benefits.
- **FORCED LABOR/PRISON LABOR** Suppliers shall not use forced labor or involuntary labor including, but not limited to, prison labor, indentured labor, slave labor, human trafficking, or other forms of compulsory labor.
- **FREEDOM OF ASSOCIATION** Suppliers shall recognize and respect rights of workers to join organizations of their own choosing or to refrain from joining organizations. Suppliers shall respect the rights of workers to bargain collectively through representatives of their own choosing where a union has been chosen in accordance with applicable laws and regulations.
- **DISCRIMINATION, DIVERSITY, AND HARASSMENT** Struktol expects that its Suppliers will not discriminate on the basis of any condition or characteristic which is protected by applicable law or regulation such as gender, race, color, religion, age, national origin, sexual orientation, gender identity, disability, political opinion, or social or ethnic origin. Struktol is committed to diversity and inclusion and expects the same of its Suppliers. Struktol expects Suppliers will not tolerate sexual or personal harassment, intimidation, or threats against their employees that create a hostile work environment.



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## III. ENVIRONMENTAL, HEALTH, SAFETY, AND SECURITY (“EHSS”)

Suppliers must develop and implement policies and procedures that are protective of the environment and human health, safety, and security including the following:

- **SYSTEMS** EHSS policies operating and continuous improvement management systems (similar to ISO 14001 and ISO 45001) designed to detect, avoid, and respond to potential risks and emergencies for the safety and health of all employees and the environment.
- **WORK ENVIRONMENT** Maintain a healthy, clean, and safe work environment and must not utilize physical disciplinary practices.
- **EMERGENCY PREPAREDNESS AND LIFE SAFETY** Be prepared for emergency situations and maintain adequate security at all facilities. Suppliers should regularly train employees on emergency planning, emergency exit procedures, and responsiveness.
- **SUBSTANCE ABUSE** Maintain a workplace free from illegal use, possession, sale, or distribution of controlled substances.

If a Supplier has been charged with a serious health or safety violation that results in suspension of operations or significant penalties, or if a Supplier is found guilty in any legal or administrative proceeding of a serious health or safety violation, the Supplier must immediately notify Struktol.

## IV. PROTECTING THE ENVIRONMENT

Suppliers must operate in an environmentally responsible and efficient manner and shall strive to minimize adverse impacts on the environment. Suppliers must conserve natural resources, minimize the use of hazardous materials where possible, and promote activities that reuse and recycle. Suppliers will engage in the development and use of climate-friendly products and processes to reduce power consumption and greenhouse gas emissions. At all times, Suppliers must comply with all applicable environmental laws and regulations as well as the Suppliers own internal environmental policies. Suppliers agree to provide environmental compliance histories and documentation to Struktol upon request. If a Supplier has been charged with a serious environmental law violation that results in suspension of operations or significant penalties, or if a Supplier is found guilty in any legal or administrative proceeding of any serious environmental law violation, the Supplier must immediately notify Struktol.

## V. CONFLICT MINERALS

Suppliers shall source minerals, derivatives of minerals, and other raw materials in a manner that respects human rights. Suppliers shall avoid directly or indirectly financing or benefiting armed groups in the Democratic Republic of Congo (“DRC”) and/or its adjoining countries. Suppliers are required to ensure that all materials and products supplied to Struktol either: (1) do not contain tantalum, tin, tungsten, or gold; or (2) if they do contain those elements, Suppliers shall cooperate with Struktol in determining the country of origin and the source (including the applicable smelter) and chain of custody of those elements.



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## **VI. COMPLIANCE AND AUDIT RIGHTS**

Suppliers must inform Struktol if and when any situation develops where the Supplier is not in compliance with any aspect of this Code. Struktol may from time to time request information or access for purposes of verifying compliance by Suppliers with this Code. Suppliers must be able to demonstrate compliance with this Code upon request and, in the event of noncompliance, Struktol expects Suppliers to take action necessary to correct such deficiency. Further, whenever Struktol has compliance reporting obligations, Struktol expects its Suppliers to respond timely and accurately to requests for information. Struktol reserves the right to engage in a limited-scope audit of its Suppliers to ensure Compliance with this Code. In the event Struktol elects to perform an on-site audit of any of its Suppliers, Struktol shall provide proper and reasonable notice (typically at least 24 hours) before any visit. Struktol expects cooperation from its Suppliers. In the event any Supplier violates any provision of this Code or is unable or unwilling to demonstrate compliance with this Code, Supplier agrees that Struktol may unilaterally terminate its relationship with the Supplier without any liability or obligation accruing to Struktol.

## **VII. CONFIDENTIALITY AND PERSONAL DATA**

Suppliers must not disclose to others and will not use for their own purposes or the purpose of others any trade secrets, intellectual property, confidential information, knowledge, designs, data, skill, or any other information considered by Struktol to be “confidential” or “proprietary”. Suppliers must employ at least the same degree of care to protect the secrecy and confidentiality of such confidential and/or proprietary information as it uses to protect its own confidential and/or proprietary information of a similar nature, but in no event less than a reasonable degree of care. Suppliers must have proper protections and policies in place so they can safeguard any such items and must always comply with applicable data privacy laws. Personal data should be handled and processed only when there is a legitimate business reason to do so, and then only in accordance with applicable law.

## **VIII. APPLICATION TO SUBCONTRACTORS**

Suppliers shall require its subcontractors who are involved in Struktol business activities to comply with the provisions of this Code as if it were the Supplier itself.