



# CHARTER MANUFACTURING

Or one of it's subsidiaries

## Supplier Code of Conduct

Charter firmly believes in our values of creating and sustaining a culture that empowers employees, promotes continuous improvement, values openness and trust, and expects ethical and professional behavior in a safe workplace. Our commitment to these values extends also to our relationships with our customers, suppliers (including sub-contractors), and other valued business partners. It is the intent of Charter to operate within all applicable laws and regulations and to maintain ethical business practices with respect to its supply base.

### Conduct Guidelines

*Human Rights*: Charter expects its suppliers to respect and support the protection of internationally proclaimed human rights and ensure that they are not complicit in human rights abuses.

*Harassment, Harsh or Inhumane Treatment*: Suppliers must create and maintain an environment that prevents sexual exploitation and abuse. All employees are to be treated with dignity and respect. Suppliers will not engage in any: threats of violence, verbal or psychological harassment or abuse, and/or sexual exploitation and abuse. Sexual exploitation and abuse include, but are not limited to, the prohibition of: (1) engaging in any sexual activity with any person under the age of 18, regardless of any laws of majority or consent, (2) exchanging any money, employment, goods, services, or other things of value, for sex, or (3) engaging in any sexual activity that is exploitive or degrading to any person. No harsh or inhumane treatment, coercion or corporal punishment of any kind is tolerated, nor is there to be the threat of any such treatment.

*Gifts and Gratuities*: Suppliers are discouraged from providing any gift or gratuity to any of our employees. Charter has a policy concerning supplier relationships that applies to all our employees. This policy prohibits employees from receiving cash from any supplier and places strict limits on their receipt of promotional items, personal gifts and entertainment.

*Improper Payments*: Charter conducts business with integrity and within the bounds of the law. No Charter employee is permitted directly or indirectly to pay or receive anything of value intended to influence a decision by Charter or a vendor, supplier, subcontractor, competitor, governmental official or their representatives. Charter further prohibits its employees from engaging in any activity that creates the appearance of a conflict of interest.

*Anti-Corruption*: Charter and its suppliers adhere to the highest standards of moral and ethical conduct, to respect local laws and not engage in any form of corrupt practices, including but not limited to extortion, fraud, or bribery.

*Child and Forced Labor:* All suppliers must comply with applicable local child labor laws and employ only workers who meet the applicable minimum legal age requirement for their location. Examples include local laws that prohibit employment under the age of completion of compulsory education or under the minimum age for employment in the country of manufacture. Charter will not employ forced or involuntary labor. Suppliers must comply with local laws prohibiting forced or involuntary labor.

*Compensation and Working Hours:* Suppliers shall compensate their workers by providing wages, including overtime pay, and benefits that comply with applicable laws and regulations.

*Diversity and Inclusion:* Charter is committed to diversity and inclusion. Diversity encompasses differences in all forms such as gender, age, cultural background, disability, religion, and sexual orientation. Discrimination in the workplace is not acceptable under any circumstance. Suppliers and their contractors and subcontractors must comply with all applicable local laws concerning nondiscrimination in hiring and employment practices.

*Environmental:* Charter expects its suppliers to have an effective environmental policy and to comply with existing legislation and regulations regarding the protection of the environment. Suppliers should wherever possible support a precautionary approach to environmental matters, undertake initiatives to promote environmental responsibility and encourage the use of environmentally friendly technologies. Charter is committed to develop cleaner manufacturing processes. Our goal is to minimize Charter's impact on the environment.

*Health and Safety:* Charter conducts its operations in compliance with applicable health and safety laws and regulations. Suppliers are expected to provide a safe, healthy, and productive working environment that supports accident prevention and minimizes exposure to health risks. Suppliers and their contractors and subcontractors must comply with all applicable health and safety laws and regulations in the countries in which they operate.

*Energy:* Charter commits to uphold sustainability and manage our energy use to ensure efficient consumption of natural resources. Procurement is partly evaluated based on energy performance. Charter steel will assess energy use, consumption, and efficiency over the planned or expected operating lifetime when procuring energy using products, equipment and services which are expected to have a significant impact on our energy performance. We require a review of energy efficient alternatives, up to and including high efficiency motors or other means of energy savings.

*Confidential Information:* Charter is committed to complying with applicable laws concerning proprietary, confidential, and personal information. Suppliers and their contractors and subcontractors are required to comply with all applicable laws and regulations governing the protection, use and disclosure of Charter proprietary, confidential and personal information.

## **RESPONSIBILITY FOR COMPLIANCE**

In cases where a supplier violates this code or fails to implement the necessary remedial measures,

Charter reserves the right to disengage the supplier for new business opportunities. Revisions to this code of conduct can be found at:

<https://www.chartersteel.com/contact-us/supplying-to-charter>

## **REPORTING OF VIOLATIONS**

Violations of the Supplier Code of Conduct should be reported to Charter. Charter will make every effort to maintain the anonymity of anyone who reports possible misconduct, within the limits of the law. Reports should be submitted to company management, or by filing a confidential report with Ethical

Ethical Advocate can be reached via the internet at:

<https://chartermfg.ethicaladvocate.com/>

<https://chartersteel.ethicaladvocate.com/>

<https://charterdura-bar.ethicaladvocate.com/>

<https://charterautomotive.ethicaladvocate.com/>

<https://charterwire.ethicaladvocate.com/>