

# SUPPLIER CODE OF CONDUCT

LARSEN & SHAW is committed to responsible business and respect for human rights in line with the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the Fundamental Conventions of the International Labor Organization (ILO), and the OECD Due Diligence Guidance for Responsible Business

LARSEN & SHAW's approach to doing business reflects its continuous pursuit of excellence. Employees as well as interacting external parties are held to the same high standard compliant with all applicable anti-corruption, competition, and antitrust laws.

To ensure compliance with statutory provisions and ethical, social, and environmental principles within its own supplier base, LARSEN & SHAW has developed this Supplier Code of Conduct for all suppliers of LARSEN & SHAW and all suppliers must ensure compliance with these provisions.

### **RESPONSIBLE BUSINESS CONDUCT & ETHICS**

LARSEN & SHAW is committed to competing globally with honesty, integrity and in full compliance with all applicable laws and regulations.

LARSEN & SHAW prohibits all forms of corruption, extortion, and embezzlement, and will not conduct business with any supplier engaged in such practices.

LARSEN & SHAW requires the supplier to comply with all applicable laws and regulations relating to its behavior with business partners. The supplier commits to upholding its social and environmental responsibility in all business dealings in the countries where it conducts business. At a minimum, the supplier is obliged to comply with the following:

- 1. Prevention of Corruption. The supplier will not seek, accept, offer or grant unfair advantages.
- 2. Competition Law and Antitrust Law. The supplier conducts its business in line with free and fair competition and in accordance with all applicable competition and antitrust laws.
- 3. Foreign Trade. The supplier complies with all applicable export control, customs, tax and foreign trade regulations, including without limitation, applicable EU- and US sanctions, embargoes and other laws, regulations, government orders and policies controlling the transmission or shipment of goods, technology and payments.
- 4. Fraud and Anti Money Laundering. The supplier takes appropriate measures to prevent any form of fraud and to ensure that the business relationship to LARSEN & SHAW is not abused for money laundering or for any other unlawful activity.

#### RESPONSIBLE WORKING CONDITIONS AND PROTECTION OF HUMAN RIGHTS

The supplier respects and supports compliance of internationally recognized human rights, in particular the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, and the Fundamental Conventions of the International Labor Organization (ILO), attesting to the following:

- 1. No Forced or Underage Labor, Slavery or Human Trafficking. The supplier rejects all forms of forced labor and does not employ any person who is under the statutory minimum age as stated in the applicable laws. The supplier does not participate in and rejects all forms of slavery and human trafficking. In particular, the supplier ensures that no exploitative child labor within the meaning of ILO Convention no. 182 is or was involved in producing or processing the products to be delivered, as well as that these products do not violate any obligations resulting from the implementation of this Convention.
- 2. Anti-harassment. The supplier does not tolerate coercion, harassment or bullying in the workspace. The supplier does not threaten or subject employees to any form of psychological, physical,

sexual, or verbal abuse, intimidation or harassment, and prohibits the same.

- 3. Working Hours and Wages. The supplier complies with all applicable laws regarding working hours, minimum wages, and benefits.
- 4. Health and Safety. The supplier complies with all applicable health and safety-related laws and regulations. The supplier takes proactive measures to ensure and continuously improve safe and healthy working conditions for its employees, contractors, and visitors.
- 5. Protection of Local Communities and Indigenous Peoples. The supplier respects the rights of local communities and indigenous peoples who may be affected by doing business at the supplier's location.
- 6. Conflict Raw Materials. The supplier is committed to identify products containing minerals from conflict-affected and high-risk areas and avoid the use of such products.

## ENVIRONMENTAL SUSTAINABILITY AND CLIMATE PROTECTION

LARSEN & SHAW is continuously evaluating and improving its products and processes to ensure sustainable use of resources and efficient use of energy limiting the impact of our operations and products on climate change and natural resources. LARSEN & SHAW expects the same of its suppliers.

The supplier ensures that it complies with all applicable environmental laws and environmental regulations. In addition, the supplier maintains all required environmental permits up-to-date and complies with reporting requirements and regulations.

# VENDOR ACKNOWLEDGEMENT- SUPPLIER CODE OF CONDUCT

### CONFIDENTIAL

I acknowledge that I have received a copy of and have read and understand Larsen & Shaw's Supplier Code of Conduct. I agree to comply with the provisions of these Policies as a term and condition of my business relationship with Larsen & Shaw Ltd.

Company Name:

Signing Officer Name (Please Print):

Signature:

Date: