

Cleveland Wire Cloth Supplier Code of Conduct

At Cleveland Wire Cloth, we have established ourselves as leaders in the wire cloth industry, driven by a commitment to excellence, quality, and integrity. Our company culture and operations are firmly rooted in a set of values that include Integrity, People, Service, Quality, and Growth.

These values not only define us but also set the standard for our business interactions. As such Cleveland Wire Cloth requires its suppliers and their sub-contractors to operate in a manner consistent with our high standards. We expect our suppliers (consultants, independent contractors, suppliers, agents, and other supplier representatives without exception) to adhere to the following principal requirements to become and remain a supplier to Cleveland Wire Cloth.

- GENERAL LEGAL COMPLIANCE
 - Suppliers shall comply with all laws, rules, and regulations applicable to conducting business in their respective countries and all countries where their products or services are sold, including labor, immigration, health and safety, trade regulation, and environment.
- USE OF CLEVELAND WIRE CLOTH NAME OR LIKENESS
 - Suppliers shall not use Cleveland Wire Cloth's or its affiliates' name, trademarks, trade names, or logos for any reason without prior written authorization of an officer of Cleveland Wire Cloth or its affiliates.
- CONFLICTS OF INTEREST
 - Suppliers must conduct business openly and transparently. Suppliers should avoid and disclose any conflicts of interest, like significant relationships that include, but are not limited to, spouses, dating or physical relationships, and close friends employed by Cleveland Wire Cloth.
- CYBER SECURITY
 - Suppliers must implement risk management systems and establish network security processes while supporting clear and transparent communication between each party. Suppliers must immediately report to Cleveland Wire Cloth any data breaches and take immediate action to stop any additional data breaches.
- DATA PRIVACY
 - Suppliers shall protect the personal information of Cleveland Wire Cloth employees, customers and other affiliated parties. Suppliers must comply with and not cause Cleveland Wire Cloth to be in violation of applicable laws and regulations on the transfer, processing, protection, and retention of personal information, including, without limitation, the EU General Data Protection Regulation (GDPR). The foregoing establishes compliance expectations only and is not intended to provide or imply consent to the use or processing of such personal information.
- ETHICS AND ANTI-CORRUPTION
 - Cleveland Wire Cloth expects its suppliers to act with integrity. Suppliers shall not engage (directly or indirectly) in unethical activities with public or private parties such as offering bribes, kickbacks, or other improper payments for the purpose of gaining favorable treatment. Suppliers shall keep accurate books and records of all activities

relating to their work, and must never offer, provide, promise, or accept anything of value that could be perceived as payment for obtaining any improper business advantage. Suppliers shall comply with the U.S. Foreign Corrupt Practices Act, the U.S. Anti-Kickback Act, the U.K. Bribery Act, and the anti-bribery and anti-corruption laws of all countries where they reside or do business.

- CONFLICT MINERALS

- No product, at the time supplied by suppliers, shall contain any mineral that directly or indirectly finances an armed group that has been identified as a perpetrator of human rights abuses, including, without limitation, those defined as conflict minerals in the rules issued under Section 13(p) of the United States Securities Exchange Act of 1934.

- CHILD AND FORCED LABOR

- Suppliers shall employ only workers who meet applicable minimum legal age requirements and must comply with all other applicable child labor laws. Additionally, Suppliers shall not use forced or indentured labor or trafficked persons. All forms of slavery or any form of domination in the workplace is prohibited. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction, or fraud for labor or services.

- OCCUPATIONAL SAFETY, INJURY, AND ILLNESS

- Suppliers shall ensure employees are provided workplace health and safety training prior to initiating any work activity and regularly thereafter. Suppliers shall identify, assess, and control employee exposure to potential safety hazards in conformance with applicable laws and regulations and through design, engineering, and administrative controls, preventative maintenance, safe work procedures, ongoing safety training, and appropriate personal protective equipment.

- DISCRIMINATION

- Suppliers shall promote a diverse work environment and provide a workplace free of discrimination, harassment, and abuse, compliant with all applicable human rights and employment laws.

- PROPER IDENTIFICATION OF PRODUCTS

- Suppliers must accurately represent offered product traits and characteristics, including any trademarks, trade names, trade dress, patents, or copyrights, country of origin marking and other product data.

- PRODUCT SAFETY AND QUALITY

- Products and services supplied to Cleveland Wire Cloth must be designed, produced, and delivered with the utmost consideration for the health and safety of suppliers' employees and customers. Products and services must meet or exceed all quality and safety standards required by applicable law and Cleveland Wire Cloth's quality requirements. See the full terms of Cleveland Wire Cloth's quality requirements at www.wirecloth.com/terms-and-conditions.

- PURCHASE ORDER TERMS AND CONDITIONS

- Suppliers agree to Cleveland Wire Cloth's full purchase order (PO) terms and conditions of sale.

- COMPLIANCE MONITORING
 - Suppliers shall grant Cleveland Wire Cloth and its representatives or agents access to their facilities and relevant records associated with the products or services provided to Cleveland Wire Cloth.

- CODE OF CONDUCT, POLICY ENFORCEMENT AND REPORTING VIOLATIONS
 - Suppliers must verify and monitor compliance with this Code at their operations and sub-tier source operations. Violations of this policy can be reported legal@wirecloth.com.