

## **Robertshaw Supplier Code of Conduct**

At Robertshaw, we recognize that as a global company our responsibilities to ourselves and our customers extend beyond our own operations into those of our suppliers, contractors, subcontractors and consultants (collectively "Suppliers"). We continuously strive to ensure that we deal with transparency and according to appropriate business standards and expect our Suppliers to do the same.

Robertshaw's commitment to proper business conduct and sustainability is embodied in the Robertshaw Code of Conduct and its supporting policies. Robertshaw executive management expects all Robertshaw employees and Suppliers to adhere to its principles which require a commitment to act with the highest standards of integrity and in an ethically and environmentally responsible manner.

To this end, we have developed the Robertshaw Supplier Code of Conduct (Supplier Code), which integrates into it many relevant aspects of the Robertshaw Code of Conduct, leaving out provisions that are not necessarily relevant to Suppliers but more relevant to Robertshaw employees. We require that all Suppliers, at a minimum, comply with the Supplier Code.

In selecting its Suppliers, Robertshaw may give preference to those that will comply with the letter and spirit of the Supplier Code. Non-compliance with the Supplier Code may not only result in Supplier disqualification for future business with Robertshaw, but serve as a ground to terminate, without Robertshaw liability, any pending Robertshaw purchase order or contract with a Supplier.

The following sets forth the provisions of the Supplier Code.

### **■ Governance/Compliance.**

All Robertshaw Suppliers shall:

- Ensure their operations and the products and/or services supplied to Robertshaw comply with Robertshaw specifications and all national, local and other applicable laws and regulations.
- Not offer or provide, directly or indirectly, anything of value, including cash, gifts, entertainment, bribes or kickbacks to any Robertshaw employee, representative, customer, or any government official, in connection with any Robertshaw business or procurement activity.
- Not engage in any activity that shall create a conflict of interest with its obligations to Robertshaw, and Suppliers shall report any conflicts of interest that come to its attention.
- Safeguard, respect and not use any non-public Robertshaw (or other) confidential information for personal gain or share with others for their gain.
- Respect and comply with business gifts and entertainment policies for Suppliers established by Robertshaw.

### **■ Trade Compliance:**

All Robertshaw Suppliers shall:

- Understand and follow applicable international trade control and customs laws and regulations.
- Never participate in boycotts or other restrictive trade practices prohibited or penalized under US or other applicable laws.
- Make sure all transactions are screened for embargoed countries/restricted parties in accordance with applicable export/import requirements.

■ **Commitment to Management/Business Practices.**

All Robertshaw Suppliers shall:

- Design, implement and maintain effective management systems, with appropriate objectives and targets, to ensure (a) compliance with applicable laws, regulations and any Robertshaw requirements related to Supplier's operations, products and services; (b) conformance with the Supplier Code; and (c) identification and mitigation of operational risks related to the areas covered by the Supplier Code.
- Employ fair business practices and comply with applicable competition and antitrust laws.
- Require its suppliers who provide goods or services that support Robertshaw business to adhere to the Supplier Code, or any similar code required to be complied with by Robertshaw Suppliers, in respect of any Robertshaw customer business.
- Keep timely, accurate and complete books and records in accordance with applicable standards, laws and regulations, and any Robertshaw requirements.

■ **Commitment to Employees.**

All Robertshaw Suppliers shall:

- Not use forced, bonded or indentured labor or involuntary prison labor.
- Not use or employ workers younger than the applicable minimum age.
- Not permit at its facilities or that of its suppliers any actual or threat of harsh and inhumane treatment, including any sexual or other harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, or permit any retaliation against those who report such acts.
- Engage in fair and anti-discriminatory employment practices in the hiring, payment, benefits, advancement, termination and retirement of its employees as provided or protected by applicable law.
- Recognize and respect any rights of workers to exercise lawful rights of free association for the purpose of collective bargaining as provided by applicable law or regulation.
- Observe applicable laws and regulations governing wages and hours.
- Comply with applicable data protection and data privacy laws.
- Maintain emergency response (including evacuation) procedures, worker training and drills, adequate exit facilities and business recovery plans.
- Have and enforce a written policy prohibiting the use of drugs and alcohol in the workplace.
- Provide adequate measures at its facilities to address the security of employees, information, IT assets and business continuity.

- Provide its workers a clean, safe and healthy work environment in compliance with all applicable laws, regulations, standards and permits for workplace health and safety and to provide appropriate training in furtherance thereof.

■ **Commitment to the Environment.**

All Robertshaw Suppliers shall:

- Not permit discharge or emissions to the environment in violation of law, issued/required permits, or in a way that would otherwise have an adverse impact on the environment.
- Operate in compliance with all applicable environmental laws, regulations, standards and permits related to its locations, operations, and products and services.
- Strive for continual improvement in the reduction of use of hazardous materials in their products and/or services.
- Strive to reduce or eliminate waste, including water and energy, at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

Any Supplier or employee of a Supplier who becomes aware of any existing or potential breach of the Supplier Code shall promptly notify the Robertshaw VP Supply Management at **vpglobal.supplymanagement@Robertshaw.com** or the Robertshaw Helpline.

Robertshaw may ask Suppliers to provide evidence of compliance with the Supplier Code and to report to Robertshaw any instances of non-compliance. In addition, Robertshaw reserves the right to audit Suppliers for compliance to the Supplier Code.