

Supplier Code of Conduct Policy

Our Supplier Code of Conduct helps ensure that all business partners, suppliers, and manufacturers meet our basic expectations of conducting business, including in relation to forced and child labor. We expect all suppliers to comply with the Code that forms part of all agreements between Fernco and Suppliers. Suppliers must comply with all laws and regulations applicable to their own operations. Any unlawful or prohibited conduct, inclusive of forced labor or child labor, will not be condoned. When selecting our Suppliers and extending an existing business relationship, we consider the expectations imposed by this Supplier Code of Conduct.

We believe this joint commitment to ethical conduct and integrity is a strong foundation for trusted business relationships that create shared value.

Ethical Business Practices

1. Obey the law

As a responsible company, we expect our Suppliers to share our commitment to following the law. We expect our Suppliers to:

- Know and follow the laws that apply to them and their business.
- Treat legal requirements as a minimum standard.

2. Conduct business with integrity

We seek business relationships based on trust, transparency, and mutual accountability. We expect our Suppliers to:

- Never offer or accept bribes, kickbacks, inappropriate gifts or hospitality, or other improper incentives in connection with Fernco's business.
- Avoid any conflict of interest relating to financial interests or other arrangements with our employees that may be considered inappropriate.

3. Keep accurate and honest records

We expect our Suppliers to maintain accurate and honest records. This helps us make responsible business decisions and disclose truthful and timely information to our stakeholders. We expect our Suppliers to:

- Maintain books and records that reflect all transactions in an accurate, honest, and timely manner
- Employ appropriate quality audit and compliance processes for matters such as product quality, worker health and safety, and labor and employment.
- Disclose, on request, the location of facilities and known origins of materials to enable traceability.

4. Honor business obligations

We work with Suppliers who share our desire to build productive business relationships. This requires honest communications, mutual respect, and delivering on commitments. We expect our Suppliers to:

- Share our commitment to conducting business with honesty and transparency.
- Honor business obligations and manage unanticipated events in a proactive, timely, and open way.

5. Protect Fernco's information, assets, and interests

We expect our Suppliers to protect Fernco's reputation and any information or property we entrust to them. We expect our Suppliers to:

- Protect any of Fernco's confidential information to which they have access, including its intellectual property, trade secrets, or financial information.
- Safeguard any property belonging to Fernco while under their control.
- Avoid any situations that may adversely affect our business interests or reputation.

FAIR EMPLOYMENT PRACTICE

1. Fair Employment Practice

We expect our Suppliers to uphold the principles and due diligence to prioritize the safety, well-being, human rights, and dignity of all individuals whose talents and hard work help us deliver our products and services. We expect our Suppliers to:

- Respect human rights as defined in the Universal Declaration of Human Rights and International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.
- Comply with applicable discrimination laws and unfair labor practice laws and hiring laws.

2. Child and Forced Labor

We have zero tolerance to child labor and forced labor. To ensure all those in our supply chain comply with our values we operate in line with principles of responsible sourcing. We expect our Suppliers to take an active role in ensuring the respect of human rights and to take efforts to combat child labor and forced labor of any kind. We expect our Suppliers to:

- Act to eliminate any form of forced labor – and work to eradicate child labor – from their operations and supply chains.
- Take guidance from international standards, conventions, and declarations, including the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Bill of Human Rights, the International Labor Organization Fundamental Principles and Rights at Work, Fighting Against Forced Labor and Child Labor in Supply Chains Act (FAFLCLSCA), and The Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.
- Not to accept, use, or benefit from child labor or forced labor
- Identify, assess, and monitor potential risk areas of child labor or forced labor.
- Comply with applicable employment age laws
- Identify inappropriate employment practices
- Identify and assess other potential risk areas
- Mitigate the risk of slavery and human trafficking occurring
- Monitor potential risk areas
- Protect whistleblowers
- Upon request, provide evidence of their compliance with the requirements of our Supplier Code of Conduct by completing the Supplier Qualification Questionnaire and Certification of Compliance.

3. Modern Slavery & Human Trafficking

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain comply with our values we operate in line with principles of responsible sourcing. We expect our Suppliers to take an active role in ensuring the respect of human rights and to take efforts to combat modern slavery of any kind. We expect our Suppliers to:

- Not to accept, use, or benefit from modern slavery of any kind, including forced labor and child labor.
- Comply with applicable laws governing employment practices
 - Identify inappropriate employment practices
- Identify and assess other potential risk areas
- Mitigate the risk of slavery and human trafficking occurring
- Monitor potential risk areas
- Protect whistleblowers

CONFLICT MINERALS

As a responsible company, we encourage our Suppliers to share our commitment ending the violence and human rights violations funded by profits from the sale of certain minerals (conflict materials), mined in the Democratic Republic of Congo (DRC) and adjoining countries. We encourage our Suppliers to:

- Promote the prevention of use of conflict materials; tin, tantalum, tungsten, and gold, (3TG) that directly or indirectly benefit armed groups in that region
- Not to engage in purchasing the conflict material directly from smelters or mines
- Take appropriate actions to report or remedy situations when aware of a supplier whose supply chain includes minerals from a non-conflict free source

FAIR TRADE

As a responsible company, we expect our Suppliers to share our commitment to supporting the ending of unfair business practices. We encourage our Suppliers to:

- promote the use of fair-trade principals, including providing fair wages
- promote the use of fair-trade principals, including providing good working conditions

WORKPLACE HEALTH AND SAFETY AND ENVIRONMENT

We encourage our Suppliers to share our commitment by providing a safe working environment for all individuals whose talents and hard work help us deliver our products and services. We encourage our Suppliers to:

- Conduct their business activities in a manner that protects the health and safety of those whose lives they touch.
- Commit to a safe and healthy workplace for all

Compliance with this Supplier Code of Conduct:

Investigations and Corrective Actions

It is our goal to build trust-based business relationships with ethical suppliers who comply with this Supplier Code of Conduct. In furtherance of this goal, we require Suppliers complete upon request the Supplier Qualification Questionnaire and Certification of Compliance with the Fight Against Forced Labor and Child Labor in Supply Chains, in compliance with the requirements of this Supplier Code of Conduct. We expect our Suppliers to fully cooperate with our reasonable request to verify compliance, and to obtain assurances that our business partners and producers uphold these principles.

When there is a concern, or we become aware of facts that indicate a Supplier has breached this Supplier Code of Conduct, we will support our suppliers' efforts to meet the standards through dialogue and cooperation. Suppliers who do not meet the requirements in the Supplier Code of Conduct need to take the necessary corrective actions and show progress. If suppliers are unwilling or unable to carry out corrective actions, we reserve the right to terminate the business relationship and any agreements with the Supplier immediately.

This Supplier Code of Conduct sets forth the minimum requirements that must be met to be a Fernco Supplier Partner. We encourage our Suppliers to have due diligence and management systems in place to meet these minimum requirements. This Supplier Code of Conduct, as updated and made publicly available at <https://www.Fernco.com/about/general-info/supplier-code-of-conduct>, replaces all previous versions of the Fernco Supplier Code of Conduct.

Raising Concerns: Grievance Process

If you see or suspect any conduct or business practices that you think could violate our Supplier Code of Conduct, please contact Fernco directly at <https://www.Fernco.com/about/general-info/supplier-code-of-conduct/contact-us>.

We handle all reports promptly, fairly, and as confidentially as possible.

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Signature: _____



Name: Mark E Cooper, President

On Behalf of Fernco, Inc and its subsidiaries

Date: July 31, 2024