

SUPPLIER CODE OF CONDUCT

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WASHINGTON MILLS

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CODE OF CONDUCT

Washington Mills has flourished for more than 150 years by consistently and reliably supplying our customers with high-quality materials at fair prices. Our success has been made possible, in large measure, by the close collaboration built with our own suppliers.

That cooperation and trust up and down our supply chain is the foundation on which we have built a sustainable future for Washington Mills, for our suppliers and, in turn, for our customers. We are grateful for these successful and productive relationships, and we confidently expect them to continue to develop well into the future in mutually beneficial ways.

Washington Mills' success is not defined solely by its financial returns. Businesses, including ours and yours, have broader responsibilities in balancing the equation of long-term viability and value – obligations to our employees, our communities, our societies and our planet.

Washington Mills is committed to these duties and the principles they represent, and detailed within this Supplier Code of Conduct, we set forth the principles by which we are guided.

Broken down into five major areas of focus – **Labor & Human Rights, Health & Safety, Environmental Impact, Ethics & Law** and **Continual Improvement** – we explain our commitment to these broader responsibilities and to acting with intention and awareness of our impact on those around us.

We trust that our supply base – including contractors, agents, distributors, suppliers and all respective subcontractors – is equally dedicated to excellence in these vital areas, and we expect a commitment to compliance with the standards and principles set forth below.

Together, we can ensure a successful and sustainable future for us all.

LABOR & HUMAN RIGHTS

Washington Mills holds itself to the highest standards of fair treatment for all employees and to the universally recognized principles of human rights. We treat our employees – including but not limited to temporary, contract, subcontract, vendor and direct workers – with dignity and respect, and we commit to partnering only with suppliers who share these expectations and uphold all standards of applicable law.

Suppliers are expected to adhere to the following principles:

Zero-tolerance of child labor practices. The use of, or supporting the use of, child labor or child exploitation is strictly prohibited. Compliance is to be ensured through age verification documentation for all employees, and all applicable employment laws of the countries where suppliers reside must be followed. Partners throughout the supply chain are expected to comply with prevailing minimum employment age laws and consistently verify that such standards are met.

Zero-tolerance of forced labor and human trafficking. Use of forced, bonded, compulsory, child, human trafficking and other exploitative labor practices is not tolerated. Washington Mills will transact business only with suppliers who prohibit the use of forced labor throughout their supply chains, and who provide safe work environments where workers are treated with dignity and respect. Employment must be voluntary, and employees must be free to leave or terminate employment at any time.

Safe and healthy working conditions at all facilities. Reasonable work weeks will not be exceeded, and in no circumstance will hours per week exceed that permitted by law. Suppliers are expected to reciprocate Washington Mills' compliance with all applicable laws and industry standards regarding working hours and safe working conditions. See [Health & Safety](#) below for more information.

Harassment- and discrimination-free work environments. Applicants and employees of legally protected status shall not be discriminated against in hiring and/or employment practices. This includes but is not limited to the areas of initial hiring, promotion, training access, termination and layoff. Physical, sexual or mental harassment, abuse, coercion or misconduct in any verbal or non-verbal form must not be tolerated, nor must detention, harsh or inhumane treatment, or the threat of any such or similar action.

Freedom to organize and bargain collectively. The right of employees to associate, organize and bargain collectively in accordance with the laws of the countries or localities in which they are employed is to be recognized and respected, as must an employee's right to decline such participation. Employees must be free to do so without fear of harassment, penalty or other negative consequence.

Compliance with all legal requirements for compensation, benefits and working conditions. All elements of compensation shall meet or exceed applicable wage laws and regulations, including those related to minimum wages, overtime hours and wages, and legally mandated benefits. Wages must be paid directly, regularly and in full to employees and recorded accurately and appropriately.

Open and retaliation-free reporting. All employees must be provided the means to report integrity concerns, safety issues, suspected forced labor or human trafficking violations, and other misconduct or compliance disputes without fear of reprisal. Reports must be investigated and appropriate corrective action taken when necessary, and retaliation against any employee making such a report must not be tolerated.

LABOR & HUMAN RIGHTS

Suppliers are expected to demonstrate compliance in the following areas:

Due diligence in supply chain operations. Washington Mills has developed an approach to due diligence and compliance driven by the laws and regulations that prohibit forced labor, and in alignment with its own values and the expectations of its customers. Washington Mills vets suppliers and subcontractors throughout its supply chain, and the same due diligence efforts are expected of its partners.

Compliance and monitoring. Washington Mills reserves the right to audit its suppliers' compliance with forced labor and human rights policy. By doing business with Washington Mills, suppliers agree to allow Washington Mills and any of its representatives or agents access to its facilities and relevant records upon request and in a timely manner.

Violations and investigations. Washington Mills will investigate all claims or indications that a supplier has engaged in forced labor or is otherwise non-compliant with forced labor and human trafficking policy. Suppliers may be held responsible for the reasonable costs of such investigations, and also agree to cooperate with any investigations regarding forced labor allegations against Washington Mills or any of its customers. **Washington Mills will sever its relationship with any supplier found to be engaging in forced labor or other human rights violations.**

Annual certification. Suppliers must comply with any Washington Mills request to certify, in writing, its compliance with the above-stated policy.



HEALTH & SAFETY

Above all else, Washington Mills is committed to ensuring the health and safety of every employee, every day. We expect that our suppliers adhere to the health and safety standards of their respective localities and industries and exceed such standards whenever possible.

Suppliers are expected to have comprehensive policies and programs dedicated to workplace health and safety, including adequate and relevant training, monitoring and reporting practices.

Suppliers are expected to adhere to the following principles:

Safety-first foundation. Incident and injury prevention must be managed through employee training, education and awareness at or above industry and governing-body standards. Appropriate and functional safety resources, including but not limited to personal protective equipment, first aid kits, exposure control measures and other applicable hazard protections must be available, accessible and free to all employees.

Identification and assessment. Thorough and continual workplace inspections must be performed to identify risks and hazards. Employees must feel personally and professionally safe to report safety concerns and injuries without consequence, and occupational injury and illness must be assessed, investigated, classified, and appropriately managed or resolved in a timely manner. Suppliers must maintain well-lit and adequately ventilated premises with appropriate temperature and noise controls where possible. Potential hazards should be eliminated through proper design, engineering, preventative maintenance, proactive education and administrative controls.

Fire safety. Fire alarms, suppression systems, firefighting equipment, emergency exits and evacuation maps must be maintained, accessible and clearly marked. Drills and continuing education should be provided regularly.

Clean and safe living conditions. Residential facilities provided or arranged by suppliers must meet or exceed local housing and safety standards. All associated costs, potential hazards or other pertinent information must be disclosed prior to start of employment. Adherence to reasonable safety standards set forth within and to any additional obligations required by local law must also be followed.

Emergency preparedness. Documented Emergency Action Plans are encouraged and should be reviewed and updated annually. Practice drilling and other proactive training measures promote swift and safe action during a crisis.



ENVIRONMENTAL IMPACT

Environmental responsibility and resource management are vital to the long-term success of suppliers and manufacturers across the globe. Minimizing the negative impact of operations on our communities and environments is of great importance to Washington Mills.

All operations of our suppliers must be conducted in full compliance with the requirements of all local, regional and national regulatory bodies and governments, and we strongly encourage our suppliers to exceed this standard. We urge our partners to act intentionally in balancing ecological impact against business risk and to prioritize responsible operational practices that limit the negative outcomes of their processes and supply chains.

Suppliers are expected to adhere to the following principles:

Promotion of energy conservation and efficiency in operations.

The pursuance of strategies surrounding energy reduction and management is encouraged and may be considered by Washington Mills during business evaluation. The use of established best practices is expected and reasonable conservation strategies must be pursued in relation to the supplier's business nature and related risks.

Emissions and water protection planning. Precautionary efforts to safeguard the resources of local communities should be implemented and documented. In balance with business needs and risks, suppliers should take proactive steps to reduce emissions, minimize water usage, and avoid air, water and land contamination.

Programmatic protections, permits and reporting. All necessary permits to operate must be obtained and maintained in a timely manner. Operational, monitoring and reporting requirements must be strictly adhered to and documented throughout the supply chain. Hazardous or harmful materials must be identified, labeled and managed in accordance with applicable laws, standards and best practices to ensure safe handling, storage, use, recycling, disposal and/or other application. Required approvals from and registrations with local, regional and national governing bodies must be monitored for compliance and kept current, and accurate tracking and reporting of data must be conducted in accordance with applicable laws and regulations.



ETHICS & LAW

Washington Mills is committed to operating with high ethical standards and integrity, and to meeting our corporate social responsibilities in support of free and unencumbered competition in a global market. We uphold zero-tolerance policies regarding all forms of bribery and corruption, including fraud, embezzlement, extortion and nepotism, and we expect commitment from our suppliers to do the same.

Suppliers are expected to adhere to the principles of:

Full and proper knowledge. Any individuals and businesses directly or indirectly associated with the supply chains of Washington Mills or its suppliers must have full and proper knowledge of all laws and regulations that apply to individuals, organizations and/or practices related to business operations. Respect for the authority of all governing bodies, as well as adherence to their judgements and standards, is expected. All legal minimum standards should be exceeded whenever possible.

Ethical and lawful competition. Washington Mills competes fairly, ethically and lawfully in all situations, transactions and activities, and evaluates associated businesses on the same standards. Fair and ethical play includes the absence of any and all communications or agreements – written, verbal, formal or informal – with any competing or non-competing entities regarding price, terms or conditions of sale, production, distribution, customers, costs, or any other competitive information.

Integrity and impropriety. Any means of obtaining undue or improper advantage in connection with Washington Mills business is prohibited. No such means, in the form of bribes, kickbacks, inappropriate gifts or other improper incentives, will be offered to suppliers, nor will they be accepted by a Washington Mills employee.

Transparency in business. Notification of any recognized issues in materials, goods or services – before or after issuance – must be communicated to Washington Mills in an appropriate and timely manner. Conflicts of interest are to be avoided, or, when avoidance isn't possible, are to be disclosed and properly resolved. Records are to be appropriately maintained and reflect all transactions accurately and honestly.

Confidentially and privacy. Washington Mills ensures the reasonable protection of personal and confidential information regarding individuals, organizations, business practices, customer and supplier data and other non-mentioned confidential or sensitive information, including all forms of intellectual property, trade secrets and financial data. This expectation of committed protection, and the standardized procedures that reasonably ensure that protection, extends to all suppliers.

ETHICS & LAW

ANTI-CORRUPTION

Strict compliance with local laws and international anti-corruption conventions is required of all Washington Mills business partners. Suppliers must not engage in, or cause Washington Mills to directly or indirectly partake in, corrupt practices of any form.

COMPETITION LAW

Suppliers must establish formal safeguards that protect against the infringement or infraction of competition laws and regulations. Compliance must be reviewed and monitored, and training must be provided to all applicable employees.

CONFLICT-FREE MINERALS

Washington Mills practices responsible and ethical sourcing in accordance with provisions of the Dodd-Frank Act and United States federal law. Any business, supplier or other entity associated with, acting on behalf of, or selling to Washington Mills, directly or indirectly, is required to comply in kind, regardless of differing laws within its respective locality of business operation.



COMMITMENT TO **CONTINUAL IMPROVEMENT**

Washington Mills encourages all suppliers to share in our commitment to continuously improving products and processes. We expect suppliers and their subcontractors to conduct business in a manner that aligns with the principles set forth in this Supplier Code of Conduct and urge our partners to develop and adjust internal policies and practices as situations and technologies progress. Washington Mills may refuse to do business with any supplier unwilling to meet, or present evidence of meeting, the requirements laid out within this document.

Our business relationships are built on trust, honesty, integrity and cooperation. We encourage violations of standards to be reported to Washington Mills and invite open dialogue concerning the practices and priorities set forth above.

The initiation of either can be done by calling Washington Mills' Ethics Hotline at 1-716-693-4550 x2260 or by emailing ethics@washingtonmills.com.

Forced labor and human rights violations or suspected violations can be reported through the avenues listed above or directly to the U.S. State Department's Global Human Trafficking Hotline at 1-844-888-FREE (3733) or help@befree.org.

WASHINGTON MILLS

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