



A Message to our Partners

In response to contractual and societal commitments of Zeus Industrial Products, Inc. ("Zeus"), Zeus requires its suppliers to ensure that they and their employees, workers, representatives, agents, suppliers and subcontractors comply with the basic standards of conduct defined in this Code of Conduct. Please contact your Zeus representative if you have any questions about this guide or the standards of business conduct that all Zeus suppliers must meet.

You, as a supplier to Zeus Industrial Products, Inc., agree to:

1. Legal Compliance

Comply with all applicable laws and regulations.

2. Human Rights and Labor Practices

Ensure respect of all internationally proclaimed human rights by avoiding causation of and complicity in any human rights violations, and specifically ensure respect of human rights of specifically vulnerable rights holders or groups of rights holders such as women, children or migrant workers, or of (indigenous) communities.

Prohibition of Forced Labor

- Neither use nor contribute to slavery, servitude, forced or compulsory labor and human trafficking.

Prohibition of Child Labor

- Employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, employ no workers under the age of 14 and employ no workers under the age of 18 for hazardous work according to ILO Convention 182.

Non-Discrimination and Respect for Employees

- Promote equal opportunities and treatment of employees, irrespective of skin color, race, nationality, disabilities, sex (including pregnancy, gender identity and sexual orientation), religious conviction, age or genetic information.
- Refuse to tolerate any unacceptable treatment of individuals such as mental cruelty, sexual harassment or discrimination including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

Working Hours, Wages & Benefits for Employees

- Allow workers to choose freely whether to organize or join associations of their own choosing for the purpose of collective bargaining as provided by local law or regulation



- Observe applicable laws and regulations governing wages and hours, recruitment and employment contracts
- Pay fair wages for labor and adhere to all applicable wage and compensation laws globally. In the event of cross-border personnel deployment adhere to all applicable legal requirements, especially with regard to minimum wages.

Health & Safety of Employees

- Comply with all applicable statutory and international standards regarding occupational health and safety and provide safe working conditions.
- Provide training to ensure employees are educated in health & safety issues.
- Establish a reasonable occupational health & safety management system.

Grievance Mechanism

- Provide access to a protected mechanism for employees to report possible violations of the principles of this Code of Conduct.

3. Environmental Protection

- Comply with all applicable environmental, health and safety (EHS) laws and regulations.
- Consider potential environmental impacts of daily business decision-making processes, and opportunities for conservation of natural resources, recycling, source reduction and pollution control to promote cleaner air and water and to reduce landfill waste.

4. Fair Operating Practices

Anti-Corruption and Bribery

- Tolerate no form of, and do not engage directly or indirectly in, any form of corruption or bribery and do not grant, offer or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage. This includes giving or accepting improper facilitation payments.

Fair Competition, Anti-Trust Laws and Intellectual Property Rights

- Comply with all applicable national and international competition laws and do not share or exchange any price, cost or other competitive information or engage in any collusive conduct with any third party with respect to any proposed, pending or current Zeus procurement.
- Respect the intellectual and other property rights of Zeus and of third parties, including all patents, trademarks and copyrights.



Conflicts of Interest

- Avoid and/or disclose internally and to Zeus all conflicts of interest that may influence business relationships, and to avoid already the appearance thereof.

Anti-Money Laundering, Terrorism Financing

- Not directly or indirectly facilitate money laundering or terrorism financing.

Export Control and Customs

- Comply with all applicable export control and customs laws and regulations.

Responsible Minerals Sourcing

- Take reasonable efforts to avoid in its products the use of raw materials which originate from Conflict-Affected and High-Risk Areas as defined in the Dodd-Frank Consumer Protection Act Section 1502 and contribute to human rights abuses, corruption, the financing of armed groups or similar negative effects by adopting policies and establishing systems to procure tantalum, tin, tungsten, and gold from sources that have been verified as conflict free.

5. Cybersecurity and Privacy

Data Privacy

- Process, store, and transmit personal data in accordance with current laws and regulations governing such data, respect everyone's privacy and ensure that personal data is effectively protected and used only for legitimate purposes.

Cybersecurity

- Ensure industry best practices are followed for the confidentiality, integrity, and availability of systems that process, store, and transmit data related to Zeus.

6. Supply Chain

- Use reasonable efforts to make its suppliers comply with the principles of this Code of Conduct.
- Comply with the principles of non-discrimination with regard to supplier selection and treatment.

7. Controllership

- To ensure that all invoices and any customs or similar documentation submitted to Zeus or governmental authorities or audited by third parties in connection with transactions involving Zeus accurately describe the goods and services provided or delivered and the price thereof and ensure that all documents, communications and accounting are accurate and honest.



8. Confirmation

We acknowledge we have reviewed the Zeus Supplier Code of Conduct and we affirm that we commit to the compliance of these principles. We will follow applicable law, treat people with dignity and respect, avoid conflict of interest, protect the environment, provide safe and healthy working conditions and protect Zeus information. Note any exceptions or comments below.

We do not comply with the expectations of the Zeus Supplier Code of Conduct and have no plans to do so. Note any comments below.

Note any exceptions or comments here _____

Supplier Name _____ Date _____

Name and Title of Supplier Representative _____