

SUPPLIER CODE OF CONDUCT

General Extrusions International LLC. (2024)

Introduction

General Extrusions International LLC (General Extrusions) is committed to the highest standards of integrity and social responsibility and expects parties providing products and services to General Extrusions (collectively, “Suppliers”) to have, or to make, a similar commitment. This Supplier Code of Conduct (the “Code”) describes General Extrusions’ expectations of how its Suppliers conduct business. General Extrusions expects Suppliers to act in accordance with the Code, and, at a minimum, comply with all applicable laws and regulations within the territories in which they operate.

Overview

The Code reflects General Extrusions’ values and sets forth what it expects from its Suppliers with respect to the following topics:

1. Ethics and integrity
2. Data privacy and security
3. Employment and working conditions
4. Wellbeing, health, and safety
5. Environment

Ethics and integrity

General Extrusions is committed to the highest ethical standards and compliance with all applicable laws, rules, and regulations. As such, General Extrusions requires Suppliers to adhere to the following standards:

Bribery and anti-corruption

Suppliers must fully comply with requirements of all applicable bribery and anticorruption laws (e.g., U.S. Foreign Corrupt Practices Act, UK Bribery Act).

Gifts and entertainment

Suppliers must not offer or accept any gift to obtain improper advantages or influence for the Supplier, General Extrusions (such as General Extrusions’ employees and their family members and associates), or any third party. Gifts include a benefit, fees, commissions, dividends, cash, gratuity, services, or any inducements.

Non-retaliation for reports of concern

General Extrusions expects Suppliers to have a policy and process for the reporting of workplace concerns. The policy and process should be readily available and understandable, and should protect reporting and participating individuals from retaliation.

Data privacy and security

General Extrusions requires its Suppliers to protect the privacy of individuals and the security of confidential information.

Confidential information

In addition to any other confidentiality obligations the Supplier may have to General Extrusions, Suppliers must protect General Extrusions' and its clients' confidential information. Suppliers must design and maintain processes to provide appropriate protections for this information.

Personal information and privacy

General Extrusions requires Suppliers to protect personal information in compliance with all applicable local laws. Personal information provided by or on behalf of General Extrusions should only be used, accessed, and disclosed as permitted by the Supplier agreement.

Non-discrimination and diversity

Suppliers must comply with all applicable laws relating to discrimination in hiring, employment practices, and harassment and retaliation. General Extrusions expects Suppliers to operate a workplaces free of discrimination, harassment, victimization, and any other abuse on any grounds including but not limited to age, disability, ethnic or social origin, gender, gender identity, nationality, race, sexual orientation, marital status, parental status, pregnancy, political convictions, religious beliefs, union affiliation, or veteran status. General Extrusions is an equal opportunity employer.

Employment and Working Conditions

Modern slavery / human trafficking

General Extrusions does not tolerate slavery, forced labor, or human trafficking in any form. General Extrusions requires Suppliers to fully comply with the applicable legal requirements of slavery, forced labor, and human trafficking laws (e.g. UK Modern Slavery Act 2015), and expects Suppliers to enact practices to ensure compliance with such laws.

Child labor

General Extrusions does not tolerate child labor in any form. Suppliers are expected to act in compliance with all laws regulating minimum working age for each position, including any laws pertaining to the employment, apprenticeships, and internships of youths and students.

Human rights

General Extrusions does not tolerate human rights violations in any form. General Extrusions expects Suppliers to enact practices to maintain a respectful and safe workplace. General Extrusions expects Suppliers to not tolerate physical violence, threats, corporal punishment, mental coercion, verbal abuse, disrespectful behavior, bullying, or harassment of any kind.

Employment laws

Suppliers must comply with all applicable local wage and labor laws. General Extrusions expects Suppliers to provide employees with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work. All use of temporary, dispatch, and outsourced labor shall be in accordance with local law.

Wellbeing, health, and safety

General Extrusions expects Suppliers to implement sound health and safety practices across all business operations. Suppliers must comply with all applicable health and safety laws and regulations. General Extrusions expects Suppliers to adopt practices to minimize health and safety risks, support accident prevention, and ensure a safe workspace for all workers.

Environment

General Extrusions is committed to reducing the impact of its operations on the natural environment and working with its Suppliers to do the same. Environmental footprint Suppliers must comply with all applicable environmental laws and regulations.

COMPLIANCE WITH THE CODE

Violations

Suppliers are required to promptly report to General Extrusions any violations of the Code or other General Extrusions policy. Suppliers must promptly forward to General Extrusions, if permitted by law, any subpoenas, regulatory requests, media inquiries, or other third-party requests concerning General Extrusions. To report a violation please email PASantangelo@genext.com. General Extrusions will keep the reported information confidential, provided it does not hinder any investigation and is permitted to do so by law.

General Extrusions' Rights

General Extrusions reserves the following rights to ensure and enforce Suppliers' compliance with the Code.

Supplier selection

General Extrusions reserves the right to evaluate a Supplier's compliance with the Code during General Extrusions' supplier evaluation and selection process, or upon request.

Violations and termination

Supplier shall ensure that its subcontractors, if any, comply with the Code, and acknowledge that it is responsible for its subcontractors' violations. In the event of non-compliance with, or violation of, the Code, General Extrusions may give the Supplier a reasonable opportunity to respond with proposed corrective actions, unless the violation is severe or incurable, or there is a violation of law. General Extrusions may suspend or terminate its relationship with the Supplier and/or disclose the matter to the appropriate authorities if there is a violation of law.

Order of Precedence; Changes to the Code

The Code is not intended to, and does not, supersede any applicable law, or any term in an agreement between General Extrusions and a Supplier. To the extent there is any conflict between this Code and any applicable law or provision of any agreement, the applicable law or agreement prevails. General Extrusions reserves the right to update or change the Code requirements at its sole discretion.