

Supplier Code of Conduct

Eisenmann Inc. · 508A Pennsylvania Avenue · Greer, SC 29650 · USA

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0 Introduction

Eisenmann Inc. (“Eisenmann” or “the Company”) is dedicated to ethical business practices, sustainability, and compliance with all applicable U.S. laws, federal regulations, and international standards, including:

- U.S. Department of Labor (DOL) Fair Labor Standards Act (FLSA)
- Occupational Safety and Health Act (OSHA)
- Environmental Protection Agency (EPA) regulations
- Foreign Corrupt Practices Act (FCPA)
- U.S. Customs and Border Protection (CBP) C-TPAT standards
- Dodd-Frank Section 1502 (Conflict Minerals)
- UN Global Compact, ILO Core Conventions, and OECD Guidelines

Suppliers, contractors, and business partners must adhere to this Supplier Code of Conduct (the “Code”) and cascade these standards throughout their supply chains.

1 Social Responsibility

1.1 Human Rights, Ban Of Child Labor And Forced Labor

We expect our Suppliers to commit to protecting international human rights. Furthermore, our Suppliers undertake to exclude any kind of child labor and forced labor within their company and their supply chain. This includes but is not limited to work carried out by children younger than 15 years, slavery, bonded labor and all forms of forced labor as well as work that is likely to harm the health, safety or morals.

1.2 Compliance with the Law

Suppliers must comply with all federal, state, and local laws in the U.S., as well as applicable international trade and labor regulations.

1.3 Ethical Recruitment

Suppliers must follow fair hiring practices and prohibit charging recruitment fees to employees.

1.4 Use of Private and Public Security Guards

Security providers must be trained in human rights and use of force consistent with U.S. law.

1.5 Minorities and Indigenous Peoples

Suppliers must respect the rights and cultural heritage of minorities and indigenous communities.

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1.6 Protection Against Forced Eviction and Land Grab

Land use must comply with lawful acquisition and fair compensation. Illegal evictions are prohibited.

1.7 Conflict Minerals and Responsible Sourcing

Suppliers must ensure minerals do not finance armed groups per Dodd-Frank Act Section 1502.

1.8 Reporting of Illegal Conduct

Suppliers must maintain internal mechanisms for confidential reporting of unethical conduct.

1.9 Whistleblowing & Protection Against Retaliation

Eisenmann prohibits retaliation against whistleblowers. Reports: ethics@eisenmann.com.

2 Labor Conditions

2.1 Work Hours and Wages

Suppliers must follow FLSA standards: 40-hour weeks, voluntary overtime, and accurate payroll documentation.

2.2 Freedom of Association and Collective Bargaining

Workers have the right to organize and bargain collectively without reprisal.

2.3 Non-Discrimination, Equal Rights and Inclusion, Women's Rights

Suppliers must ensure workplace equality in compliance with EEOC, Title VII, and ADA.

2.4 Occupational Health and Safety

Suppliers must comply with OSHA and maintain a safe workplace, providing PPE and emergency preparedness.

3 Environmental Responsibility

3.1 Environmental Protection, Resources and Sustainability

Suppliers must comply with EPA and maintain ISO 14001-aligned systems.

3.2 Decarbonization and Energy Consumption

Suppliers must reduce greenhouse gas emissions in line with DOE and Paris Agreement standards.

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3.3 Waste Management and Recycling

Waste must be managed per EPA RCRA standards.

3.4 Biodiversity, Land Utilization and Deforestation, Animal Protection

Suppliers must avoid deforestation and comply with the Endangered Species Act.

3.5 Handling Critical Raw Materials

Suppliers must maintain transparency in sourcing critical materials.

3.6 Prohibited Substances

Suppliers must comply with TSCA, REACH, and RoHS; asbestos, PCBs, mercury prohibited.

4 Ethical Business Practices

4.1 Fair Competition

Suppliers must follow Sherman Antitrust Act and FTC fair competition standards.

4.2 Protection of Confidential Information and Privacy

Suppliers must comply with CCPA and GDPR when applicable.

4.3 Plagiarism and Intellectual Property

Intellectual property rights must be respected at all times.

4.4 Integrity in Business Transactions

Bribery, kickbacks, and fraud are strictly prohibited under FCPA and UK Bribery Act.

4.5 Conflicts of Interest

Any conflicts of interest must be disclosed promptly.

4.6 Financial Responsibility (Accurate Records)

Suppliers must maintain accurate records per GAAP and IRS regulations.

4.7 Disclosure of Information

All disclosures must be truthful and transparent.

4.8 Anti-Money Laundering Policy

Suppliers must comply with the Bank Secrecy Act and Patriot Act.

4.9 Export Controls and Economic Sanctions

Suppliers must adhere to U.S. EAR, OFAC, and ITAR regulations.

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5 Implementation of the Code of Conduct

5.1 Security within the Supply Chain

Suppliers must comply with C-TPAT standards and maintain secure logistics.

5.2 Inspections, Audits, and Corrective Measures

Eisenmann reserves audit rights; suppliers must cooperate with corrective plans.

5.3 Consequences of Violations

Violations may result in suspension, termination, or legal action.

Acknowledgment

By signing below, the Supplier confirms understanding, acceptance, and compliance with the Eisenmann Inc. Supplier Code of Conduct.

Non-compliance will be considered a material breach of contract.

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Eisenmann Inc.