



## **Supplier Code of Conduct**

As a leading manufacturer in HVAC commercial ducting and ducting components, DMI Companies assumes a major responsibility regarding people and the environment. Our vision is to remain the preferred manufacturer and supplier of innovative, sustainable solutions, while continuing to serve the building industry.

In conjunction with our vision and ongoing commitment to sustainability, DMI Companies has established a Code of Conduct to ensure that all of our suppliers meet our basic business expectations and standards related to legal and ethical practices, human rights, and environmental management. These standards are based on recognized international standards, including the International Labor Organization, United Nations Universal Declaration of Human Rights and Global Compact, Responsible Business Alliance, Global Impact Investing Rating System, and industry best practices.

Compliance with these standards is an expectation of doing business with DMI Companies. The Supplier Code of Conduct defines the standards that we ask our suppliers to respect and adhere to.

DMI Companies seeks to develop and strengthen partnerships based on a shared commitment of transparency, collaboration, and mutual respect. However, the actions of our partners affect our reputation and the level of trust we have worked to earn from customers and other stakeholders. While we appreciate that our suppliers operate in a variety of different legal, geographical, and cultural environments, we expect all suppliers to comply with the Code and strive to exceed these standards.

This Code should not be a substitute for national laws, legal agreements between DMI Companies and suppliers, or other laws and agreements of consent. This Code serves as a complement to preexisting legalities to enhance supply chain sustainability including supplier-company relations, ethics, labor standards, and environmental responsibility. The following categories encompass the Supplier Code of Conduct.

### **1. Ethics**

Suppliers are expected to uphold the highest standards of business integrity and social accountability.

- **Privacy**

Suppliers should respect the privacy rights of their workers whenever they gather private information or implement worker monitoring.

- **Protection of Identity and Non-Retaliation**

Suppliers must ensure the confidentiality, anonymity, and protection of employee concerns in the workplace. Suppliers should have a communicated process for their personnel to raise any concerns without fear of retaliation.

- **Advertising and Competition**

Standards of fair business, advertising and competition are to be upheld.

## **2. Human Rights and Labor**

Suppliers are expected to protect the human rights of their employees by treating them equally and respectfully through freedom of association, the right to collective bargaining, and the elimination of forced and compulsory labor, child labor, and employee discrimination.

- **Voluntary Labor**

Suppliers employ all workers on a voluntary basis free from threats of violence, threats of criminal penalty, and restrictions on freedom of movement. Suppliers should not use any prison, slave, bonded, forced, indentured, debt induced labor, or engage in other forms of compulsory labor, slavery, or human trafficking.

- **Employment Practices**

Suppliers should employ only workers who are legally authorized to work in their facilities and are responsible for validating workers' eligibility to work through appropriate documentation. All work shall be voluntary, and workers shall be free to leave work or terminate their employment upon reasonable notice.

- **Worker Documentation**

Suppliers do not require workers to deposit original identification documents, travel documents, or any other personal legal documents upon starting employment.

- **Migrant Labor**

Suppliers recognize the unique legal, social, and cultural situations that migrant workers face and will ensure that such workers are treated with dignity, respect, and in accordance with the same standards that apply to other workers.

- **Discrimination & Harassment**

All workers are treated with respect and dignity. No worker is subject to physical, sexual, psychological, verbal harassment, abuse, or other form of intimidation. There is no discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement. Discrimination based on caste, national origin, ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership, political affiliation, health, disability or pregnancy is prohibited. In particular, attention is paid to the rights of workers most vulnerable to discrimination, such as, but not limited to, disabled persons, women, racial minorities, and elderly populations.

- **Dignity and Respect**

Suppliers shall treat all their employees fairly and with dignity and respect. Corporal punishment, physical or verbal abuse, inhumane treatment, and harassment are prohibited. In addition, Suppliers' employees shall not be subjected to any other abusive, coercive, hostile, insulting, intimidating, offensive, threatening, or unwelcome behavior in the workplace. Suppliers shall not discriminate against current or prospective employees on grounds of race, color, religion, sex, gender, sexual orientation, national origin, citizenship, age, genetic information, physical or mental disability, veteran status, or any other protected basis. Suppliers shall comply with applicable privacy laws and regulations and reasonably respect the privacy rights of their employees and any other parties with whom they do business.

- **Wages & Benefits**

Suppliers shall fully comply with all applicable labor and employment laws and regulations, including all applicable wage laws, as well as the terms of any collectively bargained agreements. Their employees shall be paid fair and competitive regular and overtime wages that meet or exceed mandatory minimum wages and are appropriate for the type of work being done. Similarly, Suppliers shall provide their employees with all legally mandated benefits. No employee of a Supplier shall be required to work excessive hours, and all such employees shall be afforded regular time off work. Wage deductions shall not be used as a disciplinary measure.

### **3. Health & Safety**

Suppliers are expected to protect and promote worker health and safety within their operations, facilities, and operating procedures.

- Suppliers shall provide a clean, safe, and secure working environment. All facilities must comply with applicable health and safety laws and regulations. Suppliers shall proactively identify and address workplace hazards and shall provide appropriate health and safety-related training. In addition, Suppliers shall implement emergency preparedness measures and take appropriate steps to protect their employees from violence and threats of violence during work.

### **4. Environment**

Suppliers are expected to identify and address environmental challenges by committing to initiatives that promote greater environmental responsibility and encourage the development of environmentally friendly practices, products and technologies.

- **Environmental Permits & Reporting**

Suppliers should ensure that they maintain and follow the reporting guidelines of all required environmental permits and registrations to be legally compliant.

- **Resource Consumption, Pollution Prevention & Waste Minimization**

Suppliers should optimize consumption of natural resources, including energy and water. Suppliers should implement and demonstrate sound measures to prevent pollution and minimize generation of solid waste, wastewater and air emissions. Prior to discharge or disposal, supplier shall characterize and treat wastewater and solid waste appropriately and according to applicable laws and regulations. Additionally, sustainable supply chains start with the vendor and we expect you to reduce packaging and non-value added dunnage in order for us as your customer to minimize our waste.

- **Training**

Training is provided to all personnel on environmental policies and procedures to ensure effective implementation, practice and compliance.

## **5. Management**

- **Records**

Suppliers should maintain accurate and transparent records and accounts of compliance with laws, regulations, and the Supplier Code of Conduct.

- **Audits & Assessments**

DMI reserves the right to audit compliance with this Code. If an audit identifies a violation of this Code, suppliers shall act promptly to correct the situation with a corrective action plan.

- **Reporting**

Suppliers are responsible for prompt reporting of actual or suspected violations of law and or this Code. This includes violations by any worker or agent acting on behalf of either the supplier or DMI.

## **6. Anti-Corruption**

DMI Companies maintains a zero-tolerance policy for supplier engagement in procurement fraud including kickbacks, fraudulent billing, bribery, purchasing and sales schemes, corrupt government practices, and negligence of the following: health and safety requirements, tax payments, mandatory licensing, and legitimate law enforcement.

- **Addressing Violations and Concerns**

DMI Companies takes violations of this Supplier Code of Conduct seriously. By violating any of the requirements and expectations outlined in this Code, a supplier risks termination of the relationship. DMI Companies may also refer misconduct to the proper authorities. Suppliers should report known or suspected violations of this Code of Conduct to DMI.