

# THRUWAY FASTENERS, INC.

## CODE OF CONDUCT

### Introduction

Thruway Fasteners Inc. (“Thruway”) is committed to the principles of honesty, integrity and compliance with all laws and regulations in Thruway’s interactions with customers, suppliers, employees, competitors and other stakeholders (collectively “Thruway’s Business Partners”). This Code of Conduct sets out Thruway’s standards and expectations for all its business relationships. Thruway reserves the right to amend this Code of Conduct and expects appropriate amendments to be implemented by its Business Partners.

### “Thruway Business Partners”

“Thruway Business Partners” includes both natural persons and legal entities associated with Thruway’s affiliated companies, employees, contractors, consultants and suppliers which supply products or render services to Thruway.

All of Thruway’s Business Partners are expected to comply with the standards of this Code. The Code forms a fundamental part of any business relationship between Thruway and its Business Partners. Violations of the Code may result in termination of the business relationship and/or the assertion of other claims.

Where applicable, Thruway’s Business Partners shall endeavor to ensure that their own suppliers and sub-contractors implement and comply with the standards set out in this Code of Conduct.

### Compliance with laws, rules and regulations

Thruway and its Business Partners are obligated to comply with all applicable local, state, federal and national laws, rules and regulations of the jurisdictions in which they conduct their business.

Thruway’s Business Partners shall maintain the required internal control systems within their respective business operations that prevent infringements of law and enable their investigation.

### Respect for and protection of human rights

Thruway’s Business Partners are required to protect human rights and treat every employee and stakeholder(s) with fairness, dignity and respect.

## **Anti-discrimination and harassment**

Thruway is committed to a culture of a respectful and inclusive workplace where all individuals are treated with dignity and equality. Thruway's Business Partners must not discriminate against employees or subject them to retaliation because of their gender, age, ethnic origin, background, nationality, race, disability, sexual orientation, religion, political conviction or similar reasons. Any physical, verbal or psychological harassment against employees, contractors, suppliers or stakeholders as well as sexual harassment must not be tolerated and should be subject to appropriate sanctions.

## **Forced labor, child labor**

Thruway's Business Partners must ensure that they do not utilize or profit from any type of child or forced labor, modern slavery or human trafficking. Business Partners must comply with all laws that specify a minimum age for employees.

## **Fair wages and working hours**

Thruway's Business Partners must pay fair wages and respect the maximum working hours in accordance with local laws and ensure compensation of a living wage according to local living conditions.

## **Health and safety**

Thruway's Business Partners must ensure the health and safety of all in their workplaces and create a work environment that promotes accident prevention and minimizes health risks for everyone working on their sites. All Business Partners must comply with locally applicable health and safety regulations and require and train employees to do so as well.

## **Fair competition**

Thruway's Business Partners are expected to adhere to the principle of fairness in competition and will not engage in price-fixing, bid rigging, or market sharing and will comply with applicable antitrust regulations. Business Partners will always respect the intellectual property rights of others.

## **Combating corruption**

Thruway does not tolerate, or engage in, any form of corruption, bribery or other unfair business practices.

Thruway expects its Business Partners to act with the highest ethical standards and to refrain from attempting to unlawfully influence business decisions or encourage others to act contrary to their obligations. Thruway's Business Partners, in doing business with Thruway, are subject to U.S. anticorruption statutes, including (but not limited to) the U.S. Foreign Corrupt Practices Act, as well as all applicable local laws. Accordingly, Business Partners should not offer or accept bribes, gifts,

hospitality, donations or any other thing of value in exchange for retaining business or obtaining favorable business decisions.

### **Prevention of money-laundering**

Thruway's Business Partners are obliged to comply with all statutory requirements aimed at preventing money laundering and must not participate in any form of money laundering activity.

### **Preventing conflicts of interest**

Thruway's Business Partners are expected to disclose all conflicts of interest that have, or might be perceived to have, an impact on the business relationship with Thruway. Required disclosures include any personal or financial relationships that could potentially influence their business or professional judgment or decision-making, and Business Partners must abstain from participating in any business dealings where such conflicts arise.

### **Export control and sanctions**

Thruway's Business Partners must comply with the applicable laws on the import and export of goods, services and information, including obtaining all necessary licenses where applicable or assisting and cooperating with Thruway in doing so. Additionally, Business Partners are expected to refrain from exporting or transferring controlled items to restricted countries or individuals covered by any U.S., EU, or other applicable embargoes or sanctions.

### **Conflict minerals**

All of Thruway's Business Partners must take appropriate measures to avoid the use of raw materials in its products and supply chain that directly or indirectly contribute to human rights abuses, corruption, funding armed groups, or similar adverse effects, or appear on any applicable jurisdiction's list of such products or sources.

### **Environmental protection, product safety and product integrity**

Thruway's Business Partners are required to comply with all applicable laws and are expected to follow appropriate environmental standards. Business Partners should strive to use all natural resources sparingly and responsibly and are expected to keep the negative impact of their business activities on the environment, climate change, biodiversity and water scarcity to a minimum.

Business Partners should implement appropriate management systems to avoid environmental and safety risks and improve existing environmental and safety standards.

Business Partners must comply with all applicable legal requirements for product safety and product integrity, the handling of hazardous substances, materials and waste as well as for labelling and packaging of products.

Business Partners are encouraged to develop and utilize energy-efficient and environmentally friendly technologies, to use all natural resources sparingly and to reduce waste, as well as emissions to air, water and soil.

### **Privacy, confidential information and intellectual property**

Thruway's Business Partners must treat all personal information with the utmost confidentiality. Business Partners must respect and comply with established cyber and data security regulations and protocols and take the necessary actions to secure and protect the confidential information of others. Likewise, Business Partners are expected to respect and comply with the provisions of any nondisclosure obligations it has with others.

### **Whistleblowing and complaints mechanism**

Business Partners are expected to enable their employees and stakeholders to report concerns or potentially unlawful practices as well as violations of this Code of Conduct without fear of retaliation.

### **Audits and assessments**

Thruway requires its Business Partners to maintain proper records of the relevant information and Thruway reserves the right to assess or audit its Business Partners to ensure compliance with the principles of this Code of Conduct. If Thruway requests information from a Business Partner to assess their compliance, Business Partners are expected to provide Thruway with the requested information and documentation within a reasonable period of time. Thruway will approach Business Partners in advance to agree on the scope, time, and place of any such compliance checks.

Violations of the standards set out in this Code of Conduct, especially violations of human rights, environmental obligations and criminal law infringements, must be stopped immediately. Business Partners are expected to engage with Thruway to seek adequate remedies for any identified risks or violations and to establish effective controls and measures to prevent their recurrence. Failure to do so may constitute "cause" under any agreement with Thruway; if a Business Partner fails to adequately address an issue within a reasonable period of time, Thruway reserves the right to terminate the business or other relationship for such cause without further notice and without prejudice to other statutory or contractual rights.

### **Summary**

As an integral member of our customers' supply chain, Thruway recognizes our obligation to conduct business in a fair, ethical manner and in compliance with all applicable laws and regulations. It is through this Code of Conduct that we endeavor to ensure that obligation is upheld by Thruway and our Business Partners.