



Worthington Enterprises Sustainable Energy Solutions – Supplier Code of Conduct

Preamble

At Worthington Enterprises Sustainable Energy Solutions, we believe in treating our customers, employees, investors and suppliers as we would like to be treated.

Our philosophy towards suppliers is:

- We cannot operate profitably without those who supply the quality materials we need.
- We ask suppliers to be competitive in the marketplace with regard to quality, pricing, delivery and volume purchased.
- We are a loyal customer to suppliers who meet our quality and service requirements through all market conditions.

Witnessing climate change and its severe consequences for the environment and the society at large, change is necessary and urgent. All organizations have a stake in this at every level and must collaborate to have an influential impact. This Supplier Code of Conduct aims to engage our suppliers to work with us.

Our sustainability purpose is “to create a distinctive journey beyond our products for sustainable, competitive, and profitable solutions, impacting positively the environment and the society at large”.

We expect our suppliers

- To commit to and comply with the principles and values set out in this Supplier Code of Conduct.
- To conduct their business in accordance with the principles set out in this Supplier Code of Conduct, supported by management systems that control and monitor these principles.
- To ensure appropriate processes, resources, capabilities and policies to comply with this Supplier Code of Conduct.
- To document policies, processes, targets and performance and to provide these to Worthington Enterprises Sustainable Energy Solutions as necessary.
- To pass on the terms of this Supplier Code of Conduct to their supply-chain, striving for sustainable development.
- To comply with all applicable laws and regulations.

Suppliers must warrant transparency and accuracy towards Worthington Enterprises Sustainable Energy Solutions concerning the principles and requirements set out in this Supplier Code of Conduct.

For Products and Services outside the European Union and supplied to Worthington Enterprises Sustainable Energy Solutions, suppliers shall duly and timely report the necessary information set out in European Union legislation i.e., Carbon Border Tax Adjustment Mechanism Directive, Corporate Due Diligence



Directive.

Suppliers are encouraged to disclose publicly their sustainable development impact, targets, engagement plans and progress.

Suppliers shall implement continuous improvement including relevant targets, implementation plans and incidents registry and corrective actions, decreasing performance or non-conformities from internal / external audits. This continuous improvement shall add sustainability aspects, securing an appropriate approach to this Supplier Code of Conduct.

Worthington Enterprises Sustainable Energy Solutions may verify suppliers' and suppliers' upstream compliance with this Supplier Code of Conduct through surveys, audits and may engage third parties to do so. Suppliers and suppliers' upstream shall support and provide any necessary accurate and relevant evidence and documentation. In the event of any deviations from the terms of the Supplier Code of Conduct, suppliers ensure to take necessary corrective actions in a timely manner.

If Worthington Enterprises Sustainable Energy Solutions determines that any supplier has violated the Supplier Code of Conduct, Worthington Enterprises Sustainable Energy Solutions may, at its discretion, terminate the business relationship and/or require the supplier to implement corrective actions. If corrective actions are advised but not taken, Worthington Enterprises Sustainable Energy Solutions may terminate current orders and may suspend the placement of future orders.

Should Worthington Enterprises Sustainable Energy Solutions recognize persistent deviation from this Supplier Code of Conduct, Worthington Enterprises Sustainable Energy Solutions may suspend or terminate its engagement with the suppliers.

1 Environment

Environmental Protection is essential at Worthington Enterprises Sustainable Energy Solutions. We expect our suppliers to fully comply with all applicable laws, regulations and standards in the jurisdiction in which they operate regarding the protection of the environment.

Suppliers are expected to operate in a way that minimizes the impact on natural resources and protects the environment.

- **Climate targets:** We encourage suppliers to adopt science-based targets to reduce Greenhouse Gas emissions to no net emissions by 2050 or sooner and annually to disclose their progress.
- **Climate Change risks:** We welcome suppliers to evaluate, mitigate, and report on their climate change transitional and physical risks.
- **Environmental impact:** Suppliers shall evaluate, minimize or eradicate environmental impacts of their operations and value stream.
- **Resource conservation and circular economy:** Suppliers shall strive



innovation for their products and/or services, their operations and value stream to increase resource efficiency including raw materials, water, energy (etc...), minimize waste, explore the use of alternate materials and establish an adapted circular economy in collaboration with Worthington Enterprises Sustainable Energy Solutions.

- **Residual Waste:** Suppliers shall drastically reduce waste by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials. Control, handling, storage, transport, treatment and disposal of any residual waste must be carried out in accordance with applicable regulations and in an environmentally responsible manner.
- **Packaging and plastic:** Suppliers shall innovate to reduce packaging while warranting safe handling and freight. Plastic usage shall be reduced to its minimum by using bio plastics or alternative recyclable material.
- **Biodiversity preservation, deforestation and animal welfare** are essential components of environmental protection. Worthington Enterprises Sustainable Energy Solution expects suppliers, their operations and their value stream to:
 - a. protect natural ecosystems and stop the conversion, deforestation, and forest degradation.
 - b. consider and respect animal welfare.
- **Chemical and Hazardous Materials:** Suppliers using chemicals and other materials posing a hazard if released to the environment shall identify those chemical and hazardous materials and manage to ensure their safe handling, movement, storage, recycling or reuse and disposal.
- **Wastewater and Solid Waste:** Suppliers shall monitor and control wastewater and solid waste generated from operations, industrial processes and sanitation facilities and treat them as required prior to discharge or disposal.
- **Air Emissions:** Suppliers shall characterize, monitor and control air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations and treat them as required prior to discharge or disposal.

2 Social

At Worthington Enterprises Sustainable Energy Solutions, we expect our suppliers to fully comply with all applicable laws and regulations governing labour, health and safety at work.

- **Occupational Health and Safety:** Suppliers shall use a health and safety management system to implement proactive measures that supports accident prevention and minimizes health risk exposure. In the event that the supplier visits and/or works at a Worthington site, the supplier must fully comply with and respect the Worthington Occupational Health and Safety site rules.
- **Minimum Work Age:** Suppliers shall not use any form of child labour



within their organization or purchase materials or services from companies using underage labour.

- **Forced Labour:** Suppliers shall not use any form of forced, involuntary or slave labour within their organization or purchase materials or services from companies using forced, involuntary, or slave labour.
- **Discrimination:** Suppliers are expected to promote equal opportunities and fair and respectful treatment of all employees in recruitment and employment practices. There shall be no tolerance of harassment, mental or physical coercion, verbal abuse of employees, threats of violence, conscious or unconscious discrimination based on an employee's characteristics, age, disability, ethnicity, family status, gender, gender expression, gender identity, genetic information, national origin, physical characteristics, political affiliation, pregnancy, religion, social origin, sexual orientation, union membership or any other unlawful criterion under applicable law.
- **Modern slavery:** Suppliers shall not tolerate and/or participate directly or indirectly in any sort of modern slavery (i.e., human trafficking, sex trafficking, bonded, indentured, or involuntary prison labour, withholding personal property, passports, wages, training certificates).
- **Due diligence:** Suppliers shall actively contribute to respect human rights and dignity and secure due diligence by identifying, avoiding, remedying any human rights impacts in communities.
- **Employments contracts, training, instructions:** Suppliers shall ensure that employment contracts, training and instructions are provided to employees in a language they understand.
- **Employees' legal status:** Suppliers shall secure that their employees are legally authorized to work and possess a valid work permit, visa and any necessary legally required documents.
- **Working environment:** Suppliers shall secure safe and hygienic working conditions, clean and adequate working facilities, aiming for well-being at work. In the event that accommodation building is provided, it must be stable, safe and provide a comfortable and secure living environment.
- **Students and interns' employments:** Should suppliers employ students or interns as part of educational trainings, appropriate measures required for young workers or interns, particularly with regard to the nature of the work, duration of the work, remuneration and the maintenance of necessary records must be implemented.
- **Remuneration and Working Time:** Suppliers are expected to comply with applicable wage and working time laws and regulations.
- **Freedom of Association/ Collective Bargaining:** Employees' rights to free association and collective bargaining shall be recognized and respected, as far as legally permitted. Suppliers, as employers, shall protect employees exercising their right to free association and collective bargaining.
- **Local communities:** Worthington Enterprises Sustainable Energy Solution encourage its suppliers to interact responsibly with their local communities and to actively engage in dialogue, economic and social development and partnerships with their neighbourhood.



- **Indigenous People:** Suppliers shall act and comply with the "UN Declaration on the Rights of Indigenous Peoples"**Harassment, Harsh or Inhumane Treatment:** Suppliers shall create and maintain an environment that treats all employees with dignity and respect and shall not use any threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse. No harsh or inhumane treatment coercion or corporal punishment of any kind is tolerated, nor is there to be the threat of any such treatment.

3 Governance

- **Compliance:** Suppliers shall comply with all applicable international, national and local laws and regulations, contractual agreements and internationally recognized standards.
- **Prohibition of Bribery:** Suppliers shall not tolerate corruption or bribery in the course of their business and shall ensure compliance with all anti-corruption laws, including but not limited to the Foreign Corrupt Practices Act.
- **Antitrust/ Unrestricted Competition:** Suppliers are expected to conduct business in a fair manner and comply with all applicable antitrust laws and regulations.
- **Money laundering:** Worthington Enterprises Sustainable Energy Solutions does not tolerate partners who engage in, legitimise or are indirectly involved in money laundering or hidden illegal funds.
- **Preventing Conflicts of Interest:** Suppliers shall not make business decisions that create situations that are, or appear to be, a conflict of interest. Any factors that might influence our suppliers' decision due to private, business or other conflicts of interest must be prevented.
- **Trade compliance:** Suppliers shall comply with applicable export control and customs regulations and provide accurate information to customs and other authorities.
- **Accounts, records, accounting principles:** Suppliers shall ensure appropriate, accurate, transparent and complete financial accounts and records in all respects.
- **Data protection, Confidentiality, and Intellectual Property:** Suppliers are expected to keep all employees' and business partners' business and financial data, intellectual property, personal data and technical information confidential using appropriate safeguards. The processing and storage of personal data must comply with the guidelines of the EU Data Protection Regulation (EU GDPR). Suppliers shall not use Worthington Enterprises Sustainable Energy Solutions' name and/or information, logos, products and/or images in publications, media or advertising without Worthington Enterprises Sustainable Energy Solutions' prior written consent.
- **Cyber security:** Suppliers shall ensure appropriate/updated protection of their systems (hardware and/or software) and adhere to relevant Worthington Enterprises Sustainable Energy Solutions policies. Suppliers shall be liable for any malicious and/or fraudulent attacks that affect their systems (hardware and/or software) resulting in damage to either party.



Suppliers shall inform Worthington Enterprises Sustainable Energy Solutions as soon as practically possible of any incidents that may affect Worthington Enterprises Sustainable Energy Solutions' systems, its partners, or its customers' information and/or data.

- **Worthington Enterprises Sustainable Energy Solutions asset protection:** In the event that suppliers are in possession of any Worthington Enterprises Sustainable Energy Solution assets, suppliers shall act responsibly and use them in accordance with the agreed framework. Supplier is liable for all damages and consequential damages to Worthington Enterprises Sustainable Energy Solutions' assets.
- **Emergency, risks and training:** Suppliers warrant to
 - a. evaluate environmental, health and safety risks at their premises
 - b. implement relevant safety and emergency plans
 - c. inform, train, protect employees, contractors and when applicable neighbourhood communities.
- **Business contingency plan:** Suppliers shall implement a business contingency planning that includes strategies and plans to recover from disasters that may disrupt the operations, including industrial, chemical, biological, natural hazards.
- **Supply-chain:** Suppliers shall be committed to responsible and sustainable procurement that considers environmental, social and governance aspects and secure that the principles contained in this Supplier Code of Conduct are adhered to further up the stream.
- **Counterfeiting:** Suppliers warrant that their suppliers / subcontractors at all tiers will only supply products and/or build-in components that are currently in production and have been purchased from the original manufacturers, their authorized distributors, or suppliers who obtain such products and/or components exclusively from the original manufacturers of the products and/or components or their authorized distributors. Suppliers then assume full responsibility and are obliged to inspect, test and validate authenticity of the products and/or components. Suppliers are also required to obtain traceability information and provide this information to Worthington Enterprises Sustainable Energy Solutions upon request. Suppliers' selection of approved suppliers/sub-contractors is subject to review and audit by Worthington Enterprises Sustainable Energy Solutions. Suppliers warrant that their suppliers / subcontractors at all tiers comply with all applicable legislation on raw material, components and chemical substances.
- **Conflict minerals:** Suppliers shall secure that their upstream suppliers comply with applicable material restriction and the required declaration. Suppliers shall warrant that the product and/or material supplied to Worthington Enterprises Sustainable Energy Solutions do not contain minerals or derivatives from conflict zones and / or prohibited substances by applicable legislation. Suppliers will provide upstream transparency, information and certificates upon request by Worthington Enterprises Sustainable Energy Solutions.



4 Ethic line

The Worthington Enterprises Ethic Line is open to external stakeholders and can be used by anyone involved in the Worthington Enterprises Sustainable Energy Solution value stream. The Worthington Enterprises Ethics Line and website are operated by an independent third party, are available in local languages and are anonymous. To report either on-line or by phone, please check the following link, **worthington.ethicspoint.com**. Suppliers shall ensure that a similar process ensures confidentiality, anonymity and protection of whistleblowers.

TOWARDS TOMORROW TOGETHER

Signature

I certify that I have been provided a copy of “Worthington Enterprises Sustainable Energy Solutions Supplier Code of Conduct”, reviewed it in its entirety and commit myself to implement its content with our employees, agents, subcontractors and suppliers. My company will comply with the principles of the Worthington Enterprises Sustainable Energy Solutions Supplier Code of Conduct, and will proactively inform Worthington Enterprises Sustainable Energy Solutions about any non-compliance of these principles.

I certify that I am authorized by my company to sign and accept Worthington Enterprises Sustainable Energy Solutions Supplier Code of Conduct on its behalf.

Signature _____

Place / Date -

Company Name -