



3/14/2025

Supplier Code of Conduct

Overview

Supplier Code of Conduct

Century Mold Company Inc. (“Century Mold”) is committed to maintaining the highest standards of ethical conduct, social and environmental responsibility, and operational excellence. As a leading supplier of plastic injection molded parts for the automotive, defense, packaging, industrial, and consumer markets, we expect our suppliers to uphold these same values in all aspects of their operations.

This Supplier Code of Conduct (“Code”) sets forth the expectations and requirements for Century Mold as well as all suppliers, contractors, consultants, and business partners (collectively “Suppliers”) doing business with Century Mold.

1. Compliance with Laws and Ethical Business Practices

Suppliers must:

- Comply with all applicable local, national, and international laws and regulations, including those related to labor, trade, the environment, and data privacy.
- Operate with the highest standards of business integrity and ethics, including zero tolerance for bribery, corruption, fraud, or extortion.
- Avoid and disclose conflicts of interest.
- Prohibit and avoid insider trading or unauthorized use of confidential information.
- Maintain accurate and complete business and financial records.

2. Labor and Human Rights

Century Mold is committed to ensuring that its suppliers uphold the human rights of workers. Suppliers must:

- Prohibit all forms of forced labor, human trafficking, and child labor. The minimum employment age must meet or exceed local legal requirements or 15 years, whichever is higher.
 - Ensure freely chosen employment and allow workers to resign freely with reasonable notice.
 - Ensure all workers are treated humanely and with respect and commit to a workplace free of harassment. Workers cannot be subject to corporal punishment, physical, sexual, or verbal abuse. Employees may not threaten workers with monetary fines as a means of discipline.
 - Ensure that workers are not subject to any form of slave, bonded, indentured, or prison labor. Ensure workers are not subject to any form of involuntary labor by means of threat, fraud, abduction, or payments to any individual having control over another individual for the purpose of exploitation or abuse.
 - Ensure that no worker is subject to harassment, abuse, or unlawful discrimination.
 - Respect the rights of workers to associate freely and bargain collectively, in accordance with local laws.
 - Provide fair wages, legally mandated benefits, and limit working hours in compliance with applicable laws. Overtime must be compensated at pay rates greater than the regular hourly rates and in compliance with local laws.
 - Use legally compliant third-party employment agencies and be responsible for their adherence to this Code.
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3. Health and Safety

Suppliers must:

- Comply with all Federal, State and Local laws regarding workplace safety.
 - Provide a safe and healthy working environment and take proactive steps to prevent occupational injuries and illnesses.
 - Identify and mitigate risks through health and safety programs, training, and emergency preparedness.
 - Provide access to potable water, clean toilet facilities, and sanitary food preparation and eating areas. Worker dormitories, where provided, must be maintained clean and safe, and provide reasonable living space.
 - Ensure workers have appropriate workplace health and safety information and training in their primary language. Health and safety related information shall be clearly posted in the facility. Workers must be encouraged to raise safety concerns.
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4. Environmental Responsibility

Century Mold expects suppliers to minimize their environmental impact by:

- Complying with all applicable environmental laws and regulations.
 - Managing hazardous substances and waste responsibly.
 - Reducing emissions, energy consumption, and water usage.
 - Promoting recycling and responsible sourcing of raw materials.
 - Where feasible, implementing an environmental management system such as ISO 14001.
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5. Responsible Sourcing

Suppliers must:

- Exercise due diligence in their supply chains to ensure the sourcing of raw materials, including conflict minerals (tin, tantalum, tungsten, gold), does not finance armed conflict or contribute to human rights violations.
 - Be prepared to disclose sourcing practices and support full traceability of materials.
 - Avoid unlawful evictions or harm to indigenous communities or local populations in resource procurement.
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6. Confidentiality and Intellectual Property

Suppliers must:

- Protect the intellectual property rights and confidential information of Century Mold and third parties.
 - Only use confidential information for the purpose agreed upon and prevent unauthorized disclosure or misuse.
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7. Monitoring and Enforcement

Century Mold reserves the right to:

- Audit suppliers' compliance with this Code through periodic assessments or third-party evaluations.
 - Request documentation and responses related to supplier compliance and due diligence efforts.
 - Take corrective action or terminate relationships in cases of non-compliance or failure to remedy violations.
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8. Reporting Concerns and Whistleblower Protection

Suppliers must:

- Provide an anonymous grievance mechanism for their employees and sub-suppliers to report unethical behavior or Code violations.
- Protect whistleblower confidentiality and prohibit retaliation against individuals who raise concerns in good faith.

Concerns relating to Century Mold can be reported to:

 sustainability@centurymold.com

9. Ethics

Century Mold expects all suppliers to uphold the highest standards of ethics and integrity in all aspects of their business operations, including sourcing, relationships, and compliance. Suppliers must:

- **Responsible Sourcing of Materials**
Exercise due diligence in their supply chains to ensure materials, including conflict minerals, are sourced responsibly. Suppliers must adopt policies and procedures to identify and mitigate environmental, social, and human rights risks. Products must not directly or indirectly support armed groups, unsafe working conditions, or serious environmental harm.
- **Trade Compliance and Export Controls**
Comply with all applicable trade, export, re-export, and import laws and regulations. Suppliers must not engage in transactions with individuals or entities under U.S. or international embargo or sanction. Suppliers working with the U.S. Government must also comply with applicable defense-related standards of business conduct.
- **Privacy and Data Protection**
Protect the personal information of Century Mold employees, customers, and business partners. Suppliers must follow data privacy laws and take measures to ensure the secure handling, storage, and transmission of personal information.
- **Business Integrity**
Maintain the highest standards of integrity. Bribery, corruption, extortion, and embezzlement are strictly prohibited. Suppliers must comply with all relevant anti-corruption laws and ensure any subcontractors or third parties adhere to equally high standards of business conduct.
- **Gifts and Gratuities**
Avoid offering or accepting gifts, entertainment, or anything of value that could influence or appear to influence business decisions. Gifts should never be exchanged during or close to active negotiations. Cash gifts are never acceptable.
- **Improper Payments**
Do not engage in or permit the use of bribes, kickbacks, or similar unlawful payments

under any circumstances, including where such activity may be allowed by local customs or laws.

- **Conflicts of Interest**

Disclose any potential or actual conflicts of interest involving Century Mold, such as doing business with a Century employee's family member or personal associate.

Suppliers must avoid situations that may compromise impartiality.

- **Insider Trading**

Do not trade or advise others to trade securities based on material, non-public information obtained in the course of business with Century Mold or any other party.

- **Business Records**

Maintain complete, transparent, and accurate records of all transactions. Suppliers must not falsify records and must comply with all applicable regulations regarding environmental, safety, labor, and financial reporting.

10. Acknowledgment and Implementation

- By doing business with Century Mold, Suppliers acknowledge and agree to the principles of this Code. Suppliers must cascade these requirements throughout their supply chain and ensure sub-tier suppliers also adhere to these principles.
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