

Supplier Code of Conduct

Ajax Metal Forming Solutions, LLC (“Ajax,” “we,” “our”, “Company”) is committed to being a global provider of innovative metal-forming solutions. We produce world-class metal parts using advanced manufacturing processes from our three locations in Minneapolis, Minnesota; Wilson, North Carolina; and Tucson, Arizona. We meet or exceed expectations with both our ISO 9001:2015 and 13485:2016 certifications and take pride in meeting or exceeding our Ajax Vision:

- Continue to be an ethically and socially responsible business.
- Work safely without incidents or lost time injuries.
- Maintain and develop partnerships that enhance mutual success.
- Deliver every part on time and to print.
- Provide opportunities for personal growth and achievement.
- Develop a highly trained/educated and diverse team.
- Fairly compensate each team member based on job-related skills.
- Embrace all environmental and governmental regulations.

This Supplier Code of Conduct (“Code”) describes the standards Ajax expects Suppliers to act and understand and abide by local, state and federal laws, and regulations and strive for environmental stewardship. Ajax expects Suppliers to act in accordance with the Code, and at minimum requires that all Suppliers comply with applicable laws and regulations within the geographies where they operate, to cooperate with regulatory enforcement regulations and be open-minded.

Suppliers stated in this document are defined as any third party who provides goods or services to the Company, such as vendors, agency recruiters and contractors.

Ethics and Integrity

Ajax is committed to the highest social standards and adheres to all applicable laws, rules and regulations. We believe that respect, honesty and transparency will succeed in a business and require our suppliers to adhere to the following standards:

A. Gifts and entertainment

Suppliers should use good judgment when exchanging business courtesies. Gifts, meals, entertainment, trips and hospitality may be viewed as bribes and can lead to a conflict of interest. If supplier gifting is permitted, it should be modest, infrequent and occur in the normal course of business. Do not offer anything of value to obtain or may appear to influence, compromise or obligate an Ajax employee.

B. Non-retaliation for reports of grievance

Ajax expects Suppliers to have a process for reporting workplace concerns. The policy should be transparent, understandable and protect individuals from retaliation from reporting such concerns.

Data privacy and security

Ajax requires its Suppliers to protect the privacy of personal information for everyone with whom they do business, including suppliers, consumers, customers and employees. Suppliers will comply with privacy and information security laws and regulations

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A. Confidential Information

Suppliers must protect Ajax Metal Forming Solutions and its clients' assets and information. Suppliers must maintain processes to provide appropriate protection. Ajax requires Suppliers to follow all applicable security laws and regulations on disclosure agreements that contain personal information collected, stored, processed, transmitted and shared.

Inclusive and diversity

Ajax Metal Forming Solutions, LLC is diverse and does business around the world. We encourage culture diversity in a workplace setting and prohibit any form of discrimination. Ajax expects our suppliers to comply with all laws and regulations regarding discrimination in hiring, employment practices and harassment and retaliation.

A. Non-discrimination and Harassment

Ajax requires Suppliers to have a safe workplace that is free of discrimination, harassment victimization, and any other abuse on the grounds including but not limited to age, disability, ethnicity, social origin, gender identity, gender, nationality, race, sexual orientation, marital status, pregnancy, political status, union affiliation, religious beliefs, or veteran status.

Financial and Accounting Practices

Ajax Metal Forming Solutions requires that all Suppliers have a management system in place to ensure all financial practices are legal and ethically compliant, transparent, anti-bribery and corruption and financially responsible.

A. Bribery and anti-corruption

Suppliers must comply with the bribery and anti-corruption law (FCPA) which in summary is Suppliers must not engage in any form of corruption, such as, offering, accepting or promising anything of value to gain a unfair advantage of a business, customer or contractor.

B. Transparency and Financial Responsibility

Suppliers are required to record and disclose any information that complies with the applicable local, state, and federal laws and regulations. All records must be internally controlled and ensure transparency in their financial dealings. All financial records should conform to Generally Accepted Accounting Principles (GAAP).

C. Anti-Money Laundering

Ajax prohibits its Suppliers from engaging in any illegal activities that could be used for any form of money laundering. All Suppliers must comply with all relevant laws and regulations related to all forms of financial crime prevention.

Working Conditions

Ajax believes that safety is an integral part of each employee's job. All our employees are responsible for working safely by following procedures and policies while complying with the Occupational Safety and Health Act (OSHA) and Company standards.

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The safety and well-being of our valued employees remain top priority. Ajax continues to invest in safety training, Personal Protective Equipment (PPE), and a clean hazard-free workplace.

A. Health and Safety

Suppliers must comply with all applicable health and safety laws and regulations. Ajax expects Suppliers to adopt practices to minimize health and safety risks, ensure safe workspaces for all workers and support accident prevention.

Suppliers will implement procedures to prevent, track, manage, report and document occupational injury and illnesses as well as encourage employees to report without threat of discipline or retaliation.

B. Machine Safeguarding

Suppliers will regularly evaluate machinery safety hazards to employees and where appropriate. Documentation of these evaluations is secure and controlled.

C. Sanitation

Suppliers will provide employees with ready access to a clean facility; such as, clean toilets, sanitary water and food preparation, storage and air filtration system to remove harmful dust particles.

D. Documentation

Suppliers will maintain adequate records of required training, hazard analysis, risk assessments, safety data sheets and/or notifications or violations required by health and safety regulations. Documentation of work-related illness and injuries, injury rates and corrective actions that were implemented is a requirement under OSHA.

Employment

Suppliers are to comply with all state and federal laws and regulations relating to employment. Ajax supports the Equal Employment Opportunity (EEO) laws and International Labour Organization's (ILO) declaration on Fundamental Principles and Rights at work. Ajax expects its Suppliers to adhere to the same principles in their standard business practice.

A. Modern Slavery / Human Trafficking

Ajax does not tolerate slavery, forced labor, or human trafficking in any form. Ajax requires Suppliers to fully comply with the legal requirements of slavery, human trafficking and forced labor and expects Suppliers to enact practices to ensure compliance with such laws and regulations within and outside of business.

B. Child Labor

Ajax does not tolerate child labor in any form. Suppliers must act in compliance with all legal laws regulating minimum working age for all positions, including any laws that pertain to employment, apprenticeships, and internships of youth and students.

This requires that no individual(s) are hired under 15 years of age, or 14 years of age where local laws allow (ILO Convention No.138), or under the legal minimum age for employment in the country, whichever is greatest.

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Any employment of employees under 18 years of age must not interfere with schooling or vocational education and/or expose young employees (between ages 14 – 18 years) to work that is physically, mentally, socially or morally dangerous.

C. Human Rights

Ajax does not tolerate violations of human rights in any form. We expect our Suppliers to enact practices to maintain a safe and respectful workplace. Ajax expects Suppliers to not tolerate any form of physical violence, corporal punishment, mental coercion, disrespectful behavior, verbal abuse, harassment or any form of bullying.

D. Employment Laws

Suppliers must comply with all applicable local labor and wage laws. Ajax expects Suppliers to provide employees with a timely and understandable wage statement in written form that includes accurate compensation for work. All use of dispatched, temporary and outsourced labor shall be in accordance with local laws. We also expect our suppliers to implement sound safety and health practices across all business operations.

Environment

Ajax works diligently to comply with local, state and federal environmental regulations. We are committed to reducing waste that impacts our operations on the natural environment and expect our Suppliers to do the same.

A. Environmental footprint

Suppliers must comply with all applicable environmental laws and regulations. Ajax expects Suppliers to measure, manage and address energy usage and greenhouse gas (GHG) emissions. Also, where applicable, expects its Suppliers to measure, manage and reduce water and waste in its operations and provide requested reporting from the Ajax Compliance Officer.

If such requests are needed, it is the Suppliers responsibility to provide credible documentation and certifications. Suppliers must obtain and keep all required permits, approvals and registrations for operational compliance and reporting requirements.

B. Hazardous and restricted substances

Suppliers must identify, label and manage the use of products, waste and other materials posing a hazard to people and the environment. Required GHS/Haz labeling on products to ensure safe handling, movement, use, storage, reuse and recycling procedures must follow local, state and federal laws and regulations.

Compliance with the Code

Violations

Suppliers are required to promptly report to Ajax Metal Forming Solutions legal violations, or violations of the Code or any other Ajax policy.

Suppliers must promptly forward to Ajax, if permitted by law, any subpoenas, regulatory requests, media inquiries, or other third-party requests concerning Ajax Metal Forming Solutions, LLC.

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Supplier selection

Ajax Metal Forming Solutions will evaluate Suppliers' compliance with the Code during Suppliers' evaluation and selection process, or upon Ajax's request.

A. Supplier assessment

During the Supplier certification and auditing process, Suppliers will be required to complete a self-assessment on compliance with the Code annually or when laws and regulations are updated. Suppliers may be asked to re-affirm compliance with the Code periodically in a timely manner.

Ajax monitors compliance with this Supplier Code through our Responsible Sourcing and Human Rights due diligence policy. We reserve the right to verify compliance with this Supplier Code, at the Supplier's own expense, through internal and external assessments.

B. Traceability and Transparency

The Company reserves the right to request that Suppliers disclose information that may pertain to geographical locations of facilities that produce any item supplier to Ajax Metal Forming Solutions, LLC, such as but not limited to, origin of raw materials, Environmental, Social and Governance (ESG) reporting and International Labour Organization (ILO) documentation stated in initial contracts.

Violations and Terminations

The Supplier shall ensure that its subcontractors, if any, comply with the Code, and acknowledge that it is responsible for its subcontractors' violations. In the event of non-compliance with, or violation of, the Code, Ajax may give the Supplier a reasonable opportunity to respond with proposed corrective actions, unless the violation is severe or incurable, or there is a violation of law. Ajax Metal Forming Solutions, LLC may suspend or terminate its relationship with the Supplier and/or disclose the matter to the appropriate authorities if there is a violation of law.

Order of Precedence; Changes to the Code

The Code is not meant to, and does not, supersede any applicable law, or any term in an agreement between Ajax Metal Forming Solutions and a Supplier. To the extent there is any conflict between this Code and any applicable law or provision of any agreement, the applicable law or agreement controls. Ajax Metal Forming Solutions, LLC reserves the right to update or change the Code requirements at any time upon notice.

Ajax Metal Forming Solutions, LLC Rights

Ajax reserves the following rights to ensure and enforce Suppliers' compliance with the Code.

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Helpful Links:

[Fair Labor Standards Act \(FLSA\)](#)

[Foreign Corrupt Practices Act of 1977 \(FCPA\)](#)

[Occupational Safety and Health Administration \(OSHA\)](#)

[International Labour Organization \(ILO\)](#)

[Equal Employment Opportunity \(EEO\) Laws](#)

[Responsible Mineral Initiative \(RMI\)](#)

[Compliance Regulation](#)

[Financial Crime Prevention Laws](#)